

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



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Order Instituting Rulemaking to Establish Policies, )  
Processes, and Rules to Ensure Safe and Reliable ) Rulemaking 24-09-012  
Gas Systems in California and Perform Long-Term )  
Gas System Planning. )  
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**OPENING COMMENTS OF THE  
JOINT COMMUNITY CHOICE AGGREGATORS ON THE  
ENERGY DIVISION STAFF PROPOSAL  
- CALIFORNIA NATURAL GAS SYSTEM MAPPING -**

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March 11, 2025

On behalf of the Joint CCAs

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In accordance with the *Administrative Law Judge’s Ruling on Senate Bill 1221 Mapping Staff Proposal and Directions to Utilities*, dated February 20, 2025 (“**ALJ Ruling**”), as modified by the February 27, 2025 *Email Ruling Partially Granting the Joint IOUs Motion for Extension of Time to Provide Comments to the 2/20/2025 ALJ Ruling on Senate Bill 1221 Mapping Staff Proposal*, (“**Email Ruling**”)<sup>1</sup> the joint Community Choice Aggregators (“**Joint CCAs**”) submit the following opening comments on the Energy Division Staff Proposal included as Appendix A to the ALJ Ruling (“**Staff Proposal**”).<sup>2</sup>

**I. INTRODUCTION AND SUMMARY**

The Joint CCAs are community choice aggregators (“**CCAs**”) providing electric service to nearly 900,000 electric accounts in Pacific Gas and Electric Company’s

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<sup>1</sup> Pursuant to the Email Ruling, the assigned administrative law judge authorized a one-week extension for the filing of opening comments, extending the due date from March 4, 2025, to March 11, 2025.

<sup>2</sup> On December 16, 2024, Peninsula Clean Energy Authority (“**PCE**”), Silicon Valley Clean Energy Authority (“**SVCE**”), and Sonoma Clean Power Authority (“**SCP**”) filed opening comments on the Order Instituting Rulemaking (“**OIR**”) for this proceeding. At the prehearing conference, January 9, 2025, representatives for Marin Clean Energy (“**MCE**”), San Diego Community Power (“**SDCP**”) and San José Community Energy (“**SJCE**”) individually entered appearances, and MCE, SDCP and SJCE were granted party status. For purposes of these comments, the Joint CCAs consist of MCE, PCE, SCP, SDCP, SJCE and SVCE.

(“**PG&E’s**”) service area. The Joint CCAs welcome the opportunity to participate in this rulemaking for the purpose of bringing their unique views before the Commission as non-profit public agencies advancing aggressive decarbonization and electrification initiatives. The Joint CCAs appreciate the Commission’s efforts to improve transparency, safety, and long-term planning for California’s natural gas system. By implementing certain refinements to the Staff Proposal, as suggested below, the Commission will ensure that the proposed mapping requirements achieve their intended goals while remaining practical and actionable for all stakeholders.

As further described below, the following summarizes the Joint CCAs’ opening comments on the Staff Proposal:

- Maps should include interactive, accessible layers with inputs that are updated at least semi-annually.
- To align with state climate goals and assess for impacts, the maps should integrate granular data from existing electrification maps.
- The Joint CCAs support alignment between load-serving entities (“**LSEs**”), CCAs, and local government electrification initiatives to plan for needs on impacted electric circuits. The mapping effort should also account for predicted gas/load service reductions in line with planned building electrification initiatives.
- To effectively prioritize pipeline replacement across the investor-owned utilities (“**IOUs**”), the Commission should establish a standardized risk score calculation methodology which considers electrification efforts to reduce extended reliance on gas infrastructure.
- The IOUs should coordinate with CCAs, local governments and tribal authorities during the mapping process and include overlays of disadvantaged communities on the maps. Additionally, the IOUs should solicit community input on mapping accuracy and completeness through periodic public workshops.

## **II. OPENING COMMENTS**

### **A. Mapping Requirements and Transparency**

The Staff Proposal appropriately recognizes the importance of publicly available, standardized gas system maps. To most effectively implement those maps, the Joint CCAs urge the Commission to require additional clarity regarding the format, data granularity, and update frequency of the maps. Specifically:

- The natural gas IOUs should provide interactive Geographic Information System maps compatible with circuit protection zone information already provided to public safety partners detailing public safety power shutoff (“**PSPS**”) impacts.<sup>3</sup> The maps should display various layers of data for public accessibility, similar to Integrated Capacity Analysis (“**ICA**”) maps provided by electric IOUs.<sup>4</sup> This enhancement is in line with the directives set forth in Decision (“**D.**”)24-10-030 which requires electric IOUs to ensure that data sets are comprehensive, equitable, and capable of being incorporated with the ICA maps.<sup>5</sup> Any gas system data should be able to easily integrate and overlay in a manner that leads to the functional integration of these data systems, ensuring that IOUs and stakeholders can seamlessly utilize the information for infrastructure planning and emergency response. This will allow LSEs to support electrification more efficiently by

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<sup>3</sup> The PSPS Maps display the frequency and duration of these outages in California by aggregating and visualizing data from the State’s IOUs. This data is paired with economic, demographic, and climate vulnerability information as identified by each census tract. Pacific Gas and Electric Company’s Wildfire Safety Progress Map provides detailed information on PSPS events including the frequency and duration of outages by circuit protection zone. (See, e.g., <https://vizmap.ss.pge.com/>.)

<sup>4</sup> In addition, existing resources, such as PG&E’s PSPS Portal, Outage Portal, Grid Resource Integration Portal tool, and Microgrid Portal, which provide registration-based access to outage and resilience planning data, should serve as models for data presentation and accessibility. (See, e.g., <https://pspsportal.pge.com/> and <https://grip.pge.com/>.)

<sup>5</sup> See, e.g., D.24-10-030 at 141 (“The Staff Proposal maintains that adding this data to the ICA results should not be a difficult task for Utilities and the result will ‘increase the value, transparency and usability of the ICA and data portal maps.’”) In this context, the staff proposal was adopted but the requirement to provide timelines was omitted. (See D.24-10-030 at 144.)

directly referencing verified data rather than relying on alternative methods to deduce which buildings are served by a specific main.

- Maps and the data inputs should be updated at least semi-annually to reflect the most current infrastructure changes and decommissioning plans; these updates should include the priority neighborhood decarbonization zones as provided by each LSE operating within each IOU service territory.

Further, any proprietary or confidential information must be clearly delineated with a transparent justification for non-disclosure. Specifically, a clear and expedient data sharing agreement process should be required between an LSE and the IOU to ensure that adequate data and time are afforded in order to develop decarbonization plans. The IOUs should work with LSEs and public safety partners to establish non-disclosure agreements to facilitate exchange of any confidential or sensitive information.

#### **B. Integration of Decarbonization and Electrification Efforts**

Senate Bill (“**SB**”) 1221 mandates the identification of priority neighborhood decarbonization zones and the evaluation of non-pipeline alternatives. To ensure that gas system planning aligns with state climate goals, the Joint CCAs provide the following comments:

- The Commission should require the natural gas IOUs to integrate gas mapping data with existing electrification and distributed energy resource planning maps at a level of granularity that allows for evaluating customer and distribution main specific impacts.
- The Staff Proposal explicitly states that gas decommissioning projects should be coordinated with LSEs, including CCAs, and local government electrification initiatives. This alignment is necessary for LSEs to plan for changes to electrical load, and for the electric IOUs to plan for needs on impacted electric circuits.

- The mapping effort should include projected gas load/service reductions associated with known building electrification programs to support proactive system planning and make best use of incentive funds available for fuel-switching.

### **C. Risk-Based Approach to Infrastructure Replacement**

The Staff Proposal's prioritization of pipeline replacement based primarily on risk score calculations is a sound approach. To best implement this, additional specificity is needed to ensure consistency across the gas IOUs. The Joint CCAs offer the following comments and recommendations:

- The Commission should establish a standardized risk-scoring methodology to ensure comparability across different IOUs. Any resulting risk-scoring methodology should specifically consider thresholds for leakage frequency and duration that subsequently constitutes an immediate prioritization of the affected area.
- Pipeline replacement prioritization should include consideration of areas where electrification and decarbonization efforts may reduce long-term reliance on gas infrastructure.
- The maps should clearly identify planned pipeline retirements alongside replacements to facilitate holistic decision-making.

### **D. Jurisdictional and Community Considerations**

To maximize the usefulness of the mapping effort, it is critical to ensure that all relevant jurisdictions, including tribal lands and disadvantaged communities, are accurately represented. The Joint CCAs support the Staff Proposal's inclusion of census tract and tribal boundaries, but recommend that:

- The Commission should require the IOUs to coordinate with local governments and tribal authorities to ensure that boundary data is accurate and up-to-date.
- The maps should include overlays of disadvantaged community designations, as identified by the California Environmental Protection Agency, to ensure equitable infrastructure planning.
- The IOUs should be required to solicit community input on mapping accuracy and completeness through periodic public workshops.

### III. CONCLUSION

The Joint CCAs appreciate the opportunity to provide comments on the Staff Proposal and support the Commission’s ongoing efforts to enhance transparency, safety, and strategic gas system planning. By implementing the refinements outlined above, the Commission can ensure that the mapping initiative under SB 1221 achieves its intended objectives while supporting California’s broader decarbonization efforts.

Dated: March 11, 2025

Respectfully submitted,

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