

**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
Gas Systems in California and Perform
Long-Term Gas System Planning.

Rulemaking 24-09-012
(Filed September 26, 2024)

**MOTION FOR PARTY STATUS OF THE LOCAL GOVERNMENT SUSTAINABLE
ENERGY COALITION**

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July 29st, 2025

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I. Introduction

Pursuant to Rules 1.4(a)(4) and 11.1 of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, the Local Government Sustainable Energy Coalition (“LGSEC”) respectfully submits this Motion for Party Status (“Motion”).

II. Interest in this Proceeding

LGSEC is a statewide membership network of more than 35 cities, counties, and regional entities that reflect nearly two-thirds of the state’s electricity demand, representing its members policy interests related to clean energy and climate resilience. LGSEC members are keenly interested in an affordable and equitable retreat from the fossil gas system. Achieving such an outcome will require effective collaboration amongst the state’s investor-owned utilities (IOUs), local governments, Native Tribes, and community-based organizations.

LGSEC was prompted to request party status by the June 5, 2025, Administrative Law Judges’ Ruling on Designating Priority Neighborhood Decarbonization Zones, as well as associated July 21, 2025, investor-IOU filings.¹

III. Discussion

A. Interaction Communication With Local Governments Key to Successful Senate Bill (SB) 1221 Decarbonization Pilots

As Pacific Gas and Electric Company (PG&E) stated,

...the presence of supportive local government or community partners is one of the two most important pieces necessary to ensure pilot success, along with creating the best blend of funding to ensure cost-effective and customer-affordable projects.²

LGSEC appreciates this acknowledgement of the central role local governments will plan in effectively identifying, implementing and learning from pilots. To advance achievement of this goal, LGSEC recommends that each of the utilities establish a technical advisory committee (TAC) to help guide pilot site selection, implementation, and evaluation. TACs are commonly deployed as part of energy research, particularly related to complex projects and those with high public interest.³

Given the need to identify suitable pilot sites by the end of this year, LGSEC suggests that a broadly-constituted TAC be organized to convene by September 1, consisting of local governments – including Community Choice Aggregators and Regional Energy Networks – community-based organizations, and researchers. Once pilot sites have been selected, TACs should be reconstituted to include similar compositions in each of the IOU service territories.

¹ JOINT RECOMMENDATION OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) AND SAN DIEGO GAS & ELECTRIC COMPANY (U 902 G) ON ADMINISTRATIVE LAW JUDGES’ RULING ON DESIGNATING PRIORITY NEIGHBORHOOD DECARBONIZATION ZONES; OPENING COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 G) ON ADMINISTRATIVE LAW JUDGES’ RULING ON DESIGNATING PRIORITY NEIGHBORHOOD DECARBONIZATION ZONES

² Page 3.

³ [Federal Advisory Committee Act | Department of Energy](#)

LGSEC is available to help identify potential TAC delegates, as well as to represent its members as part of a TAC.

B. Pilots Should be Sized and Resourced for Success

While LGSEC appreciates the geographic and other data provided by the IOUs as part of the pilot selection process, in general this information is too expansive to fully enable local governments to effectively understand, unpack, engage, or offer salient advice. In ensuing filings LGSEC recommends that the IOUs characterize their specific criteria for site selection and identify up to 150 particular places that might be suitable from a utility infrastructure perspective. Parties would then be able to determine whether they can provide the additional support needed for pilot implementation and evaluation.

Likewise, LGSEC recommends that pilot areas consist of a tractable number of participants. For example, electrifying a dozen residences would be far simpler than a mix of commercial and residential customers sprawling over multiple blocks. Pilot geography should be constructed to create the conditions to learn how best to decarbonize, overcoming such challenges as effective communication, identification and deployment of necessary electrification resources, and coordination with local governments on permitting, public safety, and other elements. If an IOU chooses more complex, sprawling areas in which to conduct one or more pilot it should do so having secured necessary resources and collaborations, and with the knowledge that even if this approach fails its purpose is to carefully study how to do better.

IV. Notice

Service of notices, orders, and other correspondence in this proceeding should be directed to LGSEC at the address set forth below:

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V. Conclusion

LGSEC's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, LGSEC respectfully requests that the CPUC grant this Motion for Party Status filing.

Dated July 29st, 2025

Respectfully submitted,
/s/ Steven Moss

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