BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue Implementation and Administration, and Consider Further Development, of California Renewables Portfolio Standard Program.	R.18-07-003 (Filed July 12, 2018)

OPENING COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E), SOUTHERN CALIFORNIA EDISON COMPANY (U 338 E), AND SAN DIEGO GAS AND ELECTRIC COMPANY (U 902 E) ON PROPOSED DECISION DENYING PETITION TO MODIFY DECISION 20-08-043

JEFFREY K. ASAY
M. GRADY MATHAI-JACKSON
BENJAMIN C. ELLIS

Pacific Gas and Electric Company
Law Department, 19th Floor
300 Lakeside Drive, Suite 210
Oakland, CA 94612
Telephone: (415) 265-2678
Email: ben.ellis@pge.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

WALTER C. WAIDELICH

San Diego Gas & Electric Company
8330 Century Park Court
San Diego, CA 92123
Telephone: (858) 331-0806
Email: wwaideli@sdge.com

Attorney for
SAN DIEGO GAS AND ELECTRIC COMPANY

JANET S. COMBS

Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, CA 91770
Telephone: 626-302-1524
Email: janet.combs@sce.com

Attorney for
SOUTHERN CALIFORNIA EDISON COMPANY

Dated: October 8, 2025

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

Order Instituting Rulemaking to Continue Implementation and Administration, and Consider Further Development, of California Renewables Portfolio Standard Program.	R.18-07-003 (Filed July 12, 2018)

OPENING COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E), SOUTHERN CALIFORNIA EDISON COMPANY (U 338 E), AND SAN DIEGO GAS AND ELECTRIC COMPANY (U 902 E) ON PROPOSED DECISION DENYING PETITION TO MODIFY DECISION 20-08-043

Pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) (collectively, the "Joint IOUs") respectfully submit these joint opening comments on the *Proposed Decision Denying Petition to Modify Decision 20-08-043* (PD), issued on September 18, 2025, that denies the Petition for Modification (Petition) filed on March 6, 2025 by the Bioenergy Association of California (BAC).[1]

I. DISCUSSION

The Joint IOUs support the PD's denial of BAC's Petition. The PD correctly concludes both that the Commission has the authority to sunset the Bioenergy Market Adjusting Tariff (BioMAT) program[2] and that the BioMAT program should end "due to high costs and underutilization of the program and availability of other procurement options for bioenergy resources."[3]

In particular, the Joint IOUs agree with the PD's focus and findings around affordability. The Governor's Executive Order N-5-24 issued on October 30, 2024 ("Affordability Executive

---

[1] Pursuant to Rule 1.8(d), PG&E confirms that counsel for SCE and SDG&E have authorized PG&E to file these joint opening comments on their behalf.

[2] *Proposed Decision Denying Petition to Modify Decision 20-08-043* (PD), p. 12 (Sept. 18, 2025) ("Pub. Util. Code Section 399.20(f)(2) authorizes the Commission to direct the IOUs to procure at least 250 MW of bioenergy capacity collectively but does not expressly prohibit the Commission to set an end date for the BioMAT Program….").

[3] *Id*. at 5.

Order")[4] demands a heightened focus on affordability. The Affordability Executive Order asks the Commission to "examine the benefits and costs to electric ratepayers of programs it oversees and rules and orders it has promulgated pursuant to statutory mandates that may be unduly adding to electric rates, or whose funding might more appropriately come from a source other than ratepayers,"[5] and "take immediate action under existing authorities to modify or sunset *any* underperforming or underutilized programs or orders whose costs exceed the value and benefits to electric ratepayers."[6] The PD properly concludes that the costs of BioMAT resources, as well as the administrative costs of operating the program, do not deliver commensurate ratepayer benefits that would justify continuing the program beyond December 31, 2025.

II. CONCLUSION

The affordability of energy is a paramount consideration in regulation and policymaking going forward. The PD's denial of BAC's Petition to extend an expensive and administratively inefficient carve-out procurement program implements the Commission's commitment to maintaining affordable electric service for Californians. The Joint IOUs urge the Commission to promptly adopt the PD without modification.

Respectfully submitted on behalf of the Joint IOUs,

JEFFREY K. ASAY
M. GRADY MATHAI-JACKSON
BENJAMIN C. ELLIS

By: */s/ Benjamin C. Ellis*
Benjamin C. Ellis

Pacific Gas and Electric Company
Law Department, 19th Floor
300 Lakeside Drive, Suite 210
Oakland, CA 94612
Telephone: (415) 265-2678
Email: ben.ellis@pge.com

Dated: October 8, 2025

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

---

4 *See generally* Governor's Executive Order N-5-24 (Oct. 30, 2024).

5 *Id*. at Ordering Paragraph (OP) 2.

6 *Id.* at OP 3 (emphasis added).