



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

FILED

12/01/25

04:59 PM

R2509004

Order Instituting Rulemaking to
Enhance Demand Response in
California.

R.25-09-004
September 18, 2025

CERTIFICATE OF SERVICE

I, Andy Schwartz, hereby certify that I have this day caused a copy of Tesla, Inc.'s Reply Comments on Order Instituting Rulemaking to Enhance Demand Response in California to be served pursuant to Commission Rules of Practice and Procedure upon the official service list for R.25-09-004, obtained from the Commission's website and attached hereto, by electronic mail (email) to all persons with a valid email address on the official service list for these proceedings.

Dated November 28, 2025, in Oakland, California.

/s/ Andy Schwartz

Senior Managing Policy Advisor
Tesla, Inc.
901 Page Avenue
Fremont CA, 94538
Telephone: (510) 410-0882
E-mail: anschwartz@tesla.com

Proceeding: R2509004 - OIR TO ENHANCE DEMAND RESPONSE IN CALIFORNIA
Filer: CPUC
List Name: LIST
Last changed: November 25, 2025

Parties

GABRIELA OLMEDO
MGR - REGULATORY
ENERGYHUB
41 FLATBUSH, STE. 400A
BROOKLYN, NY 11217
FOR: ENERGYHUB

BRIAN TURNER
DIR
ADVANCED ENERGY UNITED
1801 PENNSYLVANIA AVE. NW, STE. 410
WASHINGTON, DC 20006
FOR: ADVANCED ENERGY UNITED

SAMUEL GODA
MARKET DEVELOP & REGULATORY
KALUZA US LLC
1701 RHODE ISLAND AVE NW
WASHINGTON, DC 20036
FOR: KALUZA (US) LLC

LAURA M. SCHEPIS
U.S. POLICY LEADER
CARRIER GLOBAL CORPORATION
13995 PASTEUR BLVD.
PALM BEACH GARDENS, FL 33418
FOR: CARRIER GLOBAL CORPORATION

BRIAN CASEY
HEAD OF GOV'T AFFAIRS
U. S. VENTURE, INC.
425 BETTER WAY
APPLETON, WI 54915
FOR: U.S. VENTURE, INC.

SCOTT D. LIPTON
ENERGY POLICY MGR, WESTERN REGION
ENCHANTED ROCK, LLC
1113 VINE STREET, STE. 101
HOUSTON, TX 77002
FOR: ENCHANTED ROCK, LLC

DAVID GIBBS
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
320 West 4th Street Suite 500
Los Angeles, CA 90013
FOR: PUBLIC ADVOCATES

MICHEL KOHANIM
CEO
UNIVERSAL DEVICES
18034 VENTURA BLVD., STE. 2053
ENCINO, CA 91316
FOR: UNIVERSAL DEVICES

CONNOR FLANIGAN
DIR - REGULATORY
SOUTHERN CALIFORNIA EDISON COMPANY
8631 RUSH STREET / PO BOX 800
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

R. OLIVIA SAMAD
SR. ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE / PO BOX 800
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

JANE KRIKORIAN, J.D.
STAFF ATTORNEY
UTILITY CONSUMERS' ACTION NETWORK
404 EUCHID AVE., STE. 377
SAN DIEGO, CA 92114
FOR: UTILITY CONSUMERS' ACTION NETWORK
(UCAN)

ROGER A. CERDA
ATTORNEY
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32D
SAN DIEGO, CA 92123
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

JACQUELINE PIERO
HEAD OF US POLICY
THE MOBILITY HOUSE
545 HARBOR BLVD
BELMONT, CA 94002
FOR: THE MOBILITY HOUSE

BRITT K. MARRA
EXECUTIVE DIRECTOR
SMALL BUSINESS UTILITY ADVOCATES
548 MARKET ST., STE 11200
SAN FRANCISCO, CA 94104
FOR: SMALL BUSINESS UTILITY ADVOCATES
(SBUA)

NORA SHERIFF, ESQ.
COUNSEL
BUCHALTER, A PROFESSIONAL CORPORATION
425 MARKET STREET, 29TH FL.
SAN FRANCISCO, CA 94105
FOR: OLIVINE

NORA SHERIFF
ATTORNEY
BUCHALTER, A PROFESSIONAL CORPORATION
425 MARKET STREET 29TH FLR
SAN FRANCISCO, CA 94105-2491
FOR: CALIFORNIA LARGE ENERGY CONSUMERS
ASSOCIATION

ERIK LYON
ENERGY REGULATORY MGR.
RENEW HOME, LLC
26 OFARRELL ST. 8TH FL.
SAN FRANCISCO, CA 94108
FOR: RENEW HOME, LLC

AMANDA MYERS WISSER
DIR - POLICY & REGULATORY, WEST
WEAVE GRID, INC.
375 ALABAMA STREET, SUITE 325
SAN FRANCISCO, CA 94110
FOR: WEAVE GRID, INC.

JARED SATROM
DIR - ENERGY, CAISO
VOLTUS, INC.
2443 FILLMORE STREET, STE. 380-3427
SAN FRANCISCO, CA 94115
OF BAY AREA
For VOLTIS, INC.

ELIZABETH M. KELLY
COUNSEL
LAW OFFICE OF ELIZABETH KELLY
PO BOX 225037
SAN FRANCISCO, CA 94122 FOR: ASSOCIATION
GOVERNMENTS ON BEHALF OF THE BAY AREA
REGIONAL ENERGY NETWORK PROGRAM

ANDY SCHWARTZ
SR. MANAGING POLICY ADVISOR
TESLA, INC
901 PAGE AVENUE
FREMONT, CA 94538
FOR: TESLA, INC.

MARC MONBOUQUETTE
SR MGR - POLICY & GOV'T AFFAIRS
ENPHASE ENERGY
47281 BAYSIDE PARKWAY
FREMONT, CA 94538
FOR: ENPHASE ENERGY, INC.

JOSEPH DESMOND
EXECUTIVE DIRECTOR
CAL EFFICIENCY + DEMAND MGNT COUNCIL
849 E. STANLEY BLVD, SUITE 264
LIVERMORE, CA 94550
FOR: CALIFORNIA EFFICIENCY + DEMAND
MANAGEMENT COUNCIL

RUTHIE LAZENBY
ATTORNEY
THE UTILITY REFORM NETWORK
360 GRAND AVENUE, SUITE 150
FOR: THE UTILITY REFORM NETWORK (TURN)

EDWARD SMELOFF
CONSULTANT
2201 BROADWAY, FOURTH FLOOR
OAKLAND, CA 94612
FOR: VOTE SOLAR

JOHN NEWTON
DIR - REGULATORY
AVA COMMUNITY ENERGY
1999 HARRISON ST, SUITE 2300
OAKLAND, CA 94612
FOR: AVA COMMUNITY ENERGY

SHIRLEY A. WOO
ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
300 LAKESIDE DRIVE, 19TH FL. STE. 210
OAKLAND, CA 94612
FOR: PACIFIC GAS AND ELECTRIC COMPANY

CLAIRE V. BROOME
26 NORTHGATE AVE
BERKELEY, CA 94708
FOR: 350 BAY AREA

WILLIAM H. WEAVER
ASSIST. GEN. COUNSEL
CA. INDEPENDENT SYSTEM OPERATOR CORP
250 OUTCROPPING WAY
FOLSOM, CA 95630
FOR: CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION (CAISO)

SCOTT MURTISHAW
EXECUTIVE DIRECTOR
CALIFORNIA ENERGY STORAGE ALLIANCE
808 R STREET, SUITE 209
SACRAMENTO, CA 95811
FOR: CALIFORNIA ENERGY STORAGE ALLIANCE

ZACH WOOGEN
EXECUTIVE DIR
VEHICLE-GRID INTEGRATION COUNCIL
1401 21ST ST., SUITE 5409
1107 9TH STREET, SUITE 820
SACRAMENTO, CA 95811
FOR: VEHICLE-GRID INTEGRATION COUNCIL
(VGIC)

JON HART
MGR - POLICY
CALIFORNIA SOLAR & STORAGE ASSOCIATION
SACRAMENTO, CA 95814
FOR: CALIFORNIA SOLAR & STORAGE
ASSOCIATION

LEANNE BOBER
DIR - REGULATORY / DEPUTY GEN. COUNSEL
CALIFORNIA COMMUNITY CHOICE ASSOCIATION
1121 L STREET, STE. 400
SACRAMENTO, CA 95814
FOR: CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

SAM WADE
VP - PUBLIC POLICY
COALITION FOR RENEWABLE NATURAL GAS
1017 L STREET, SUITE 513
SACRAMENTO, CA 95814
FOR: COALITION FOR RENEWABLE NATURAL
GAS (RNG COALITION)

COLLIN SMITH
MGR - REGULATORY
LEAPFROG POWER, INC.
2108 N STREET, STE. N 12186
SACRAMENTO, CA 95816
FOR: LEAPFROG POWER, INC.

Information Only

AIMAL LAIQ

CASE COORDINATION

SAN DIEGO GAS & ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY, CA 00000

PACIFIC GAS AND ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY, CA 00000

CENTRAL FILES
SEMPRA ENERGY UTILITIES
EMAIL ONLY
EMAIL ONLY, CA 00000

ROB GELTNER
PROGRAM MANAGER
GOGREEN FINANCING (CAEATFA)
EMAIL ONLY
EMAIL ONLY, CA 00000

STEVE CAMPBELL
SENIOR ANALYST, INNOVATION STRATEGY
PENINSULA CLEAN ENERGY
EMAIL ONLY
EMAIL ONLY, CA 00000

DAVIS WRIGHT TREMAINE LLP
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: ENESFO ASSOCIATE

MRW & ASSOCIATES LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

JASON HOYLE
EQ RESEARCH
1155 KILDAIRE FARM ROAD, STE 203
CARY, NC 27511

CEM TURHAL
DIRECT ENERGY BUSINESS, LLC
910 LOUISIANA STREET, SUITE B200
HOUSTON, TX 77002

ELYSIA VANNOY
NRG - DIRECT ENERGY
910 LOUISIANA STREET
HOUSTON, TX 77002

COLEMAN NICKUM
HARPER ADVISORY
9002 SIX PINES DRIVE
SHENANDOAH, TX 77380

SAM HARPER
CONSULTANT
HARPER ADVISORY LLC
9002 SIX PINES DRIVE
SHENANDOAH, TX 77380
FOR: CALIFORNIA LARGE ENERGY CONSUMERS
ASSOCIATION

SHARON MOSESI
HARPER ADVISORY
9002 SIX PINES DRIVE
SHENANDOAH, TX 77380

AMY FINDLAY
CHARGESCAPE
1515 EAST CESAR CHAVEZ ST., SUITE 100
AUSTIN, TX 78702

DAVID P. LOWREY
UDR, INC.
1745 SHEA CENTER DRIVE, SUITE 200
HIGHLANDS RANCH, CO 80129

SARAH C. JUDKINS
ATTORNEY
KAPLAN KIRSCH LLP
1675 BROADWAY STE 2300
DENVER, CO 80202

SARAH K. BERMAN
ATTORNEY

SARAH KEANE
ATTORNEY

KAPLAN KIRSCH
1675 BROADWAY STE 2300
DENVER, CO 80202

KAPLAN KIRSCH LLP
1675 BROADWAY, STE 2300
DENVER, CO 80202

AMJAD ISSA
CALIF PUBLIC UTILITIES COMMISSION
ADMINISTRATIVE LAW JUDGE DIVISION
320 West 4th Street Suite 500
Los Angeles, CA 90013

OLIVIA BARBER
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER PROGRAM
320 West 4th Street Suite 500
Los Angeles, CA 90013

PAUL DEANG
CUSTOMER PROGRAM
SOUTHERN CALIFORNIA GAS COMPANY
555 W. 5TH STREET GT14D6
LOS ANGELES, CA 90013

C.C. SONG
SR. DIR - REGULATORY
CLEAN POWER ALLIANCE OF SO. CALIF.
801 S. GRAND AVE., STE. 400
LOS ANGELES, CA 90017

CLARK MCISAAC
ADVISOR, REGULATORY
CLEAN POWER ALLIANCE OF SO. CALIF.
801 S. GRAND AVE., STE. 400
LOS ANGELES, CA 90017

AIMEE WONG
DSM PROJECT MANAGEMENT AND COMPLIANCE
SOUTHERN CALIFORNIA EDISON
1515 WALNUT GROVE
ROSEMEAD, CA 91770

AMEE VASQUEZ
SOUTHERN CALIFORNIA EDISON COMPANY
8631 RUSH STREET
ROSEMEAD, CA 91770

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
8631 RUSH STREET
ROSEMEAD, CA 91770

ERIC YAMASHITA
SOUTHERN CALIFORNIA EDISON COMPANY
8631 RUSH STREET
ROSEMEAD, CA 91770

JESSE FEINBERG
SR. ADVISOR
SOUTHERN CALIFORNIA EDISON COMPANY
8631 RUSH STREET
ROSEMEAD, CA 91770

NATHANEL GONZALEZ
SR. ADVISOR
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE. / PO BOX 800
ROSEMEAD, CA 91770

CLAY FABER
DIR - CA & FEDERAL REGULATORY
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32F
SAN DIEGO, CA 92123
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

ROBERT WOOL
POLICY ADVISOR
CENTRAL COAST COMMUNITY ENERGY
70 GARDEN COURT, SUITE 300
MONTEREY, CA 93940

SERJ BERELSON
DIR, REG AFFAIRS & MARKET DVLPMNT, WEST
ORACLE UTILITIES OPOWER
100 ORACLE PARKWAY
REDWOOD CITY, CA 94065

JUSTIN STRACHAN

ANDREW MAGIE

SF PUBLIC UTILITIES COMMISSION
525 GOLDEN GATE AVENUE
SAN FRANCISCO, CA 94102

CALIF PUBLIC UTILITIES COMMISSION
BUILDING ELECTRIFICATION AND GAS POLICY
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ASAL ESFAHANI
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC RATES, CUSTOMER GENERATION AND
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

BRANDON GERSTLE
CALIF PUBLIC UTILITIES COMMISSION
ADMINISTRATIVE LAW JUDGE DIVISION
ROOM 5115
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JACK CHANG
CALIF PUBLIC UTILITIES COMMISSION
ADMINISTRATIVE LAW JUDGE DIVISION
ROOM 5020
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JAMES DONOVAN
CALIF PUBLIC UTILITIES COMMISSION
ADMINISTRATIVE LAW JUDGE DIVISION
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARYAM MOZAFARI
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC RATES, CUSTOMER GENERATION AND
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SARA MULHAUSER
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC RATES, CUSTOMER GENERATION AND
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

STEPHEN CASTELLO
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER PROGRAM
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

WERNER M. BLUMER
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC RATES, CUSTOMER GENERATION AND
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SFOCPUCDOCKETS
DAVIS WRIGHT TREMAINE LLP
50 CALIFORNIA STREET, 23RD FLR
SAN FRANCISCO, CA 94111

CHASITY HENDREN
ATTORNEY
DAVIS WRIGHT TREMAINE LLP
50 CALIFORNIA STREET, STE. 2300
SAN FRANCISCO, CA 94111
FOR: ENCHANTED ROCK, LLC

KATIE JORRIE
ATTORNEY
DAVIS WRIGHT TREMAINE LLP
50 CALIFORNIA STREET, 23RD FL.
SAN FRANCISCO, CA 94111

VIDHYA PRABHAKARAN
ATTORNEY
DAVIS WRIGHT TREMAINE LLP
50 CALIFORNIA STREET, 23RD FLR
SAN FRANCISCO, CA 94111
FOR: ENCHANTED ROCK, LLC

ALEX TANG
VOLTUS INC.
2443 FILLMORE ST. SUITE 380-3427
SAN FRANCISCO, CA 94115

MEGAN M. MYERS
LAW OFFICES OF MEGAN M. MYERS
110 OXFORD STREET
SAN FRANCISCO, CA 94134

JIN NOH
PRINCIPAL
DECODE ENERGY, LLC
622 10TH AVENUE
SAN MATEO, CA 94402

LUKE TOUGAS
CONSULTANT
CLEAN ENERGY REGULATORY RESEARCH
849 E. STANLEY BLVD NO.264
LIVERMORE, CA 94550
FOR: CALIFORNIA EFFICIENCY + DEMAND
MANAGEMENT COUNCIL

SYLVIE ASHFORD
ANALYST
THE UTILITY REFORM NETWORK
360 GRAND AVENUE, STE. 150
OAKLAND, CA 94610

ANA GONZALEZ
PACIFIC GAS AND ELECTRIC COMPANY
300 LAKESIDE DR
OAKLAND, CA 94612

CLAIRE HUANG
REGULATORY ANALYST II
AVA COMMUNITY ENERGY
1999 HARRISON STREET, STE. 2300
OAKLAND, CA 94612

RACHEL ALLEN
PACIFIC GAS AND ELECTRIC COMPANY
300 LAKESIDE DR
OAKLAND, CA 94612

SIDNEY BOB DIETZ II
DIR "REGULATORY RELATIONS"
PACIFIC GAS AND ELECTRIC COMPANY
300 LAKESIDE DRIVE
OAKLAND, CA 94612
FOR: PACIFIC GAS AND ELECTRIC COMPANY

JOSEPH F. WIEDMAN
ATTORNEY
LAW OFFICE OF JOSEPH F. WIEDMAN
115 BROAD ST., STE. 157
CLOVERDALE, CA 95425

ALICE KILDUFF
CALIFORNIA ISO
250 OUTCROPPING WAY
FOLSOM, CA 95630

BEN DAWSON
MARKET MONITOR
CALIFORNIA ISO
250 OUTCROPPING WAY
FOLSOM, CA 95630

CRISTY SANADA
LEAD ANALYST
CALIFORNIA ISO
250 OUTCROPPING WAY
FOLSOM, CA 95630

KEVIN HEAD
LEAD CA REGULATORY AFFAIRS SPECIALIST
CALIFORNIA ISO
250 OUTCROPPING WAY
FOLSOM, CA 95630

VASSILISA RUBTSOVA
ANALYST
CALIFORNIA ISO
250 OUTCROPPING WAY

DANIEL HORAN
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC RATES, CUSTOMER GENERATION AND
300 Capitol Mall

FOLSOM, CA 95630

Sacramento, CA 95814

DAVID OLIVER
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC RATES, CUSTOMER GENERATION AND
300 Capitol Mall
Sacramento, CA 95814

DAVID RAMIREZ
CALIFORNIA STRATEGIES
1201 K STREET, STE 1610
SACRAMENTO, CA 95814

GRACE PRATT
CALIBER STRATEGIES
801 K STREET, STE. 2800
SACRAMENTO, CA 95814
FOR: VEHICLE-GRID INTEGRATION COUNCIL
(VGIC)

JEDEDIAH GIBSON
ATTORNEY
DOWNEY BRAND LLP
621 CAPITOL MALL, 18TH FLOOR
SACRAMENTO, CA 95814

KATE UNGER
SR. ADVISOR
CALIFORNIA SOLAR & STORAGE ASSOCIATION
1107 9TH STREET, STE. 820
SACRAMENTO, CA 95814

REBEKAH DANIEL
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC RATES, CUSTOMER GENERATION AND
300 Capitol Mall
Sacramento, CA 95814

ANDREW B. BROWN
ATTORNEY
BIERING & BROWN LLP
2600 CAPITOL AVE., STE. 400
SACRAMENTO, CA 95816

MANAL YAMOUT MCDERMID
CALIBER STRATEGIES
PO BOX 160724
SACRAMENTO, CA 95816

REGULATORY CLERK
BRAUN BLAISING & WYNNE, PC (BB&W)
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816

SCOTT BLAISING
COUNSEL
BRAUN BLAISING & WYNNE P.C.
2600 CAPITOL AVE., STE. 400
SACRAMENTO, CA 95816

LYNN HAUG
ATTORNEY
BIERING & BROWN LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5931

DENVER HINDS
PRINCIPAL ELECTRICAL ENGINEER
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S STREET, MS A210
SACRAMENTO, CA 95817

JOSH STOOPS
GOV'T AFFAIRS REP. - REGULATORY
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S STREET, MS B404
SACRAMENTO, CA 95817

JOY MASTACHE
SR. ATTORNEY
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S STREET, MS B406
SACRAMENTO, CA 95817