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

Application of Pacific Gas and Electric Company for Adoption of Electric Revenue Requirements and Rates Associated with its 2026 Energy Resource Recovery Account (ERRA) and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation (U 39 E)	Application No. 25-05-011 (Filed May 15, 2025)
Expedited Application of Pacific Gas and Electric Company Pursuant to the Commissions Approved Energy Resource Recovery Account (ERRA) Trigger Mechanism (U 39 E)	Application No. 25-09-015 (Filed September 30, 2025)

CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS ON PROPOSED DECISION

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December 1, 2025

SUBJECT MATTER INDEX

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SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS[1]

With respect to the valuation of pre-2019 banked RECs for departed load, CalCCA recommends that the PD be modified to:

- Reject PG&E's pre-2019 banked REC zero valuation proposal which violates section 366.2(g)'s requirement that departed load customers receive the *value* of any benefits associated with PG&E's PCIA resources when those benefits remain with bundled service customers;

- Consistent with section 366.2(g), Commission precedent, and prior PG&E practice, value pre-2019 banked RECs at the applicable RPS Adder in the year in which PG&E uses the RECs for RPS compliance, when crediting customers based on their PCIA vintage, either permanently or on an "interim" basis pending consideration of the issue in Phase 2 of the PCIA proceeding;

- Direct PG&E to exhaust its post-2019 banked RECs before using any pre-2019 banked RECs towards its Minimum Retained RPS requirement—80 percent of the utility's 2025 shortfall can be met with these non-controversial RECs; and

- Direct PG&E to track and report not only the pre-2019 banked RECs it uses to meet 2026 compliance, but also any pre-2019 banked RECs it uses to meet ***2025*** compliance. This information will allow any updated guidance from the Commission in the PCIA proceeding regarding the treatment of pre-2019 banked RECs to apply to all pre-2019 banked RECs used for compliance in *both* 2025 and 2026.

CalCCA also recommends the following additional PD modifications regarding its adoption of SCE's interim RA Slice-of-Day methodology:

- While CalCCA does not oppose the PD's conclusion directing PG&E to implement SCE's interim RA Slice-of-Day method until the impacts of Slice-of-Day on the PCIA framework are conclusively resolved in a rulemaking, the Commission should direct PG&E to file a Tier 2 advice letter detailing its implementation of SCE's method within thirty days of its final decision in this proceeding; and

- A clarifying edit on page 35 is also needed. The PD states: "PG&E has sufficient information to apply PG&E's methodology; they would apply their current methodology for calculating the RA sales, unsold and retained RA volumes." The PD should be revised to say: "PG&E has sufficient information to apply SCE's methodology; ***PG&E*** would apply ***SCE's*** current methodology for calculating the RA sales, unsold and retained RA volumes;"

[1] Acronyms and defined terms used in the Summary of Conclusions and Recommendations are defined in the body of this brief.

CalCCA also recommends the following additional PD modification:

- The Commission should memorialize CalCCA and PG&E's uncontested agreement that data center load in CCA service territory defaults to CCA service.

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CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS ON PROPOSED DECISION

California Community Choice Association[2] (CalCCA) submits these Comments on Administrative Law Judge Fox's *[Proposed] Decision Approving Pacific Gas and Electric Company's 2026 Energy Resource Recovery Account Related Forecast Revenue Requirement and 2025 Electric Sales Forecast* (PD) pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission and the procedural schedule established in the Assigned Commissioner's Scoping Memo and Ruling (confirmed by the Administrative Law Judge's

[2] California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance of Southern California, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

November 24, 2025, E-Mail Ruling Clarifying Comment Due Dates), which modifies the time periods for comments and reply comments prescribed by Rule 14.3.[3]

I. INTRODUCTION

With little mention of its impacts on millions of California families, the PD breezes past the enormous electricity rate increases it approves for community choice aggregator (CCA) customers who have departed bundled service from Pacific Gas & Electric Company (PG&E). Earlier this year in the Power Charge Indifference Adjustment (PCIA) Track One rulemaking (R.25-02-005), the Commission adopted a revised methodology for calculating the resource adequacy (RA) market price benchmark (MPB) after the investor-owned utilities (IOUs), including PG&E, complained that the methodology that had benefitted bundled customers for many years since its adoption in D.18-10-019 needed changes.[4] This PD incorporates that new methodology into PCIA rates.

To add insult to injury, the Commission through this PD layers on an *additional* benefit to PG&E bundled customers, at the expense of departed load customers, by adopting PG&E's *proposal* to provide ***no value*** to departed load customers for renewable energy credits (RECs) being used by PG&E but paid for by those departed load customers. This change is unnecessary and premature, given the pending PCIA Track 2 proceeding. In addition, the PD violates the requirement in Public Utilities Code section 366.2(g)[5] that such value be provided to departed customers. The PD's adoption of PG&E's proposal is also contrary to prior Commission decisions, including PG&E's 2025 Energy Resource Recovery Account (ERRA) Forecast Decision, in which the Commission approved PG&E's proposal to value banked RECs (including the same vintage

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3 Assigned Commissioner's Scoping Memo and Ruling at 5 (Jul. 31, 2025) (Scoping Memo).

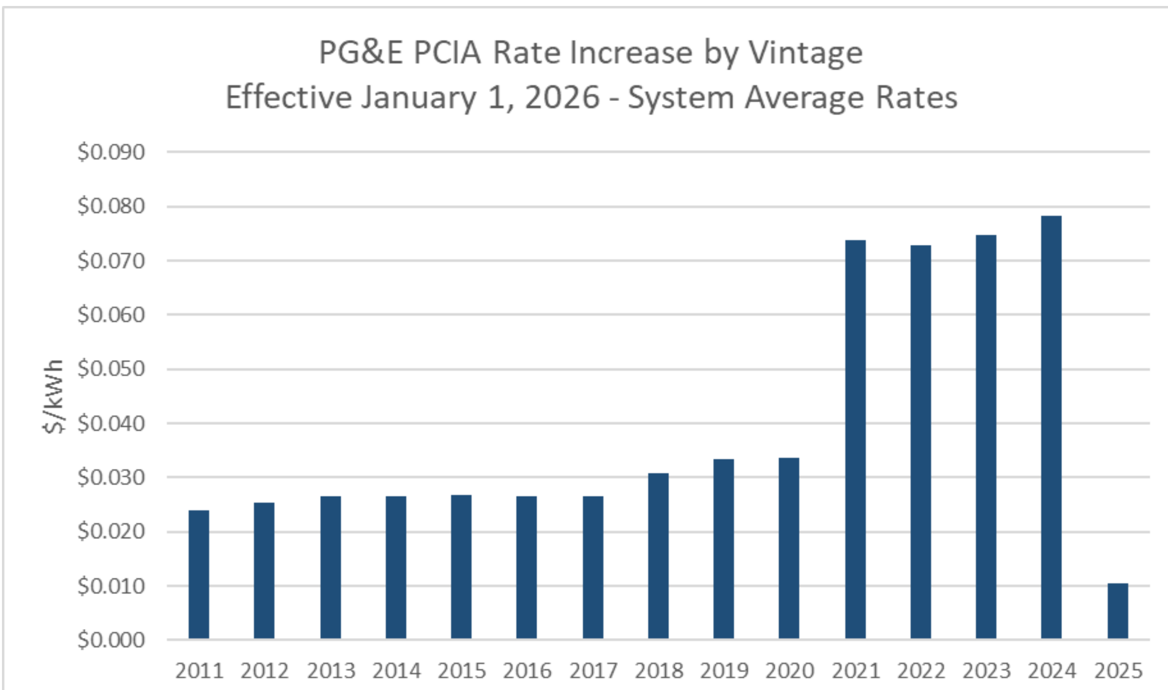
4 Decision (D.) 25-06-049.

5 All subsequent code sections cited herein are references to the California Public Utilities Code unless otherwise specified.

of RECs at issue here—pre-2019 banked RECs) and credit the departed load customer vintages corresponding to the year in which those RECs were generated.[6]

The result of this pile of new policies, along with market forces increasing PCIA rates, is substantial for departed load customers who, like all California customers, are struggling with the affordability of electricity rates. As the figures below demonstrate, PCIA rates will *skyrocket* in 2026 for departed load customers across all vintages,[7] with customers in vintages 2021-2024 being the hardest hit:

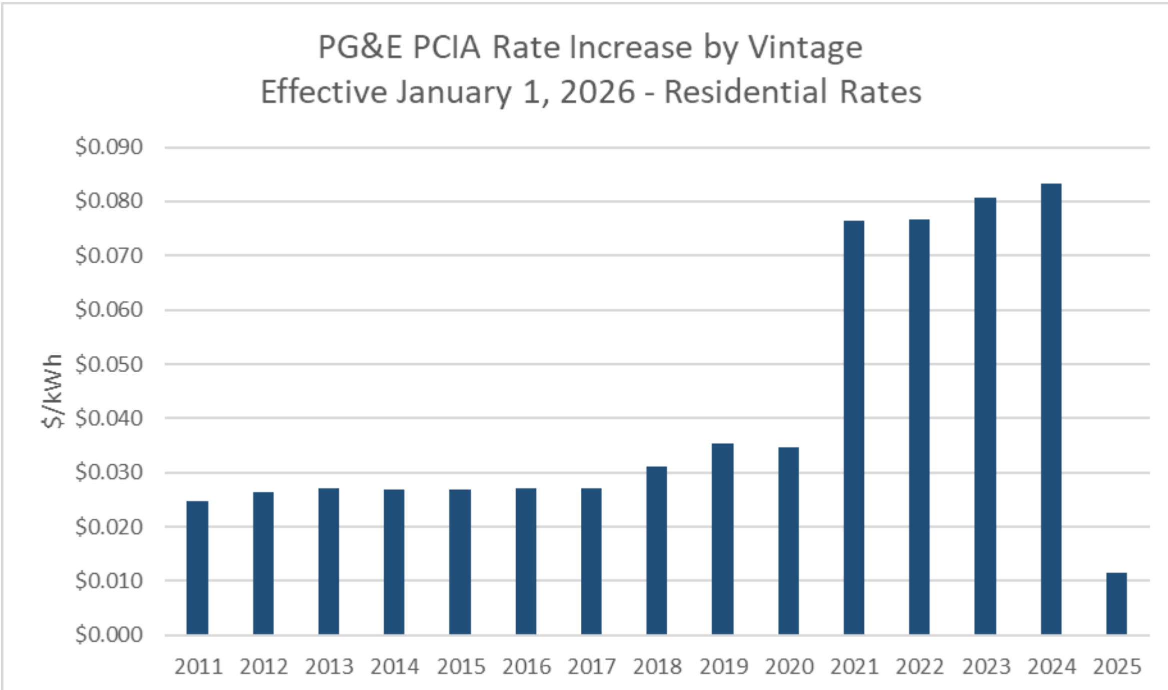
Figure 1: PCIA Rate Increase Approved in the PD, by Vintage (System Average Rates)



6 D.24-12-038 at Conclusion of Law (COL) 1.

7 Note the PD distorts and understates the PCIA rate increases customers will experience in 2026 by comparing proposed rates to rates effective March 1, 2024 (rather than January 1, 2025). *See* PD at 50-51.

Figure 2: PCIA Rate Increase Approved in the PD, by Vintage (Residential Rates)



Overall, customers purchasing their electricity from CCAs will see their cost responsibility for the PCIA increase by a staggering ***455 percent*** from 2025 to 2026.[8] The change in the PCIA cost responsibility for these departed customers is almost ***ten times*** larger than the change in the cost responsibility for bundled customers.[9]

The shift in cost responsibility will be difficult for all departed customers, including many in disadvantaged communities. For example, much of Stockton, California, is comprised of disadvantaged, low-income communities under the State of California's guidelines.[10] The PCIA rates for departed load customers will increase by more than ***eight cents per kilowatt-hour***. On

8 California Community Choice Association's Comments on Pacific Gas and Electric Company's Fall Update Testimony at 5 (Nov. 10, 2025).

9 *Ibid*.

10 *See* State of California, OEHHA, California Climate Investments Priority Populations Map 4.0 (showing Stockton as a disadvantaged community (low-income)): https://gis.carb.arb.ca.gov/portal/apps/experiencebuilder/experience/?id=5dc1218631fa46bc8d340b8e82548a6a&page=Priority-Populations-4_0.

average, this will result in an over ***$41 per month*** increase in the PCIA portion of customers' bills, equating to an enormous ***$492 annual increase***.[11] Table 2 shows other communities facing similar rate hikes, including Nevada City and Los Banos, which are also comprised of disadvantaged and/or low-income communities:[12]

Table 1: PCIA Rate Increases Approved in the PD – Example Impacts[13]

Community	Monthly Bill Increase[14]	Annual Increase
Los Banos, CA	$43.91	$526.92
Stockton, CA	$41.00	$492.00
Nevada City, CA	$32.11	$385.31

Aside from the significant rate impacts, the PD's adoption of PG&E's pre-2019 banked REC proposal simply constitutes legal error and must be modified. To ensure both bundled and departed load remain indifferent from a customer departing bundled service, Public Utilities Code section 366.2(g) *requires* that departed load customers receive the value of any benefits associated with PG&E's PCIA resources when those benefits remain with bundled service customers. Here, PG&E is using pre-2019 banked RECs for its RPS compliance on behalf of its bundled customers.

11 This figure is derived from the following formula which, per Ava Community Energy, relies on average monthly residential electricity usage in Stockton of approximately 500 kWh: $41.00 = $0.08200/kWh increase in the PCIA for Vintage 2024 times 500 kWh. The annual increase is derived from the following: $41/per month * 12 months.

12 *See* State of California, OEHHA, California Climate Investments Priority Populations Map 4.0 (showing Stockton as a disadvantaged community (low-income)): https://gis.carb.arb.ca.gov/portal/apps/experiencebuilder/experience/?id=5dc1218631fa46bc8d340b8e82548a6a&page=Priority-Populations-4_0.

13 These figures have been confirmed by the relevant CCA and utilize the same formula as the figures for Stockton in note 11, *supra*. 405 kWh is used as the average household usage for Nevada City, a Vintage 2023 community ($0.07928/kWh PCIA increase). 585 kWh is used as the average household usage for Los Banos, a Vintage 2021 and 2022 community (using 2022, that is a $0.07506/kWh PCIA increase).

14 The Monthly Bill Increase assumes the relevant CCA does not put in place any ratepayer protection mechanism to manage its customers' rate increases.

Those pre-2019 banked RECs were paid for by bundled customers at the time the RECs were generated, and then "banked" by PG&E for later use. PG&E now seeks to use those RECs, and therefore is statutorily required to provide *value* to now-departed customers who paid for the credits in the form of a credit through the PCIA.

PG&E and the Commission have previously followed these statutory requirements. Without any explanation or reasoning, the PD essentially reverses the Commission's decision in PG&E's 2025 ERRA Forecast case, which approved PG&E's proposal to value banked RECs (including pre-2019 banked RECs) and credit the PCIA vintages corresponding to the year in which those RECs were generated.[15] By allowing PG&E's about-face with its new proposal to succeed, the PD not only continues to pile on the rate impacts for unbundled customers, but clearly violates section 366.2(g).

The PD adopts PG&E's proposal on an "interim basis" given the "expedited nature" of this proceeding, and states that the proposal to "address conflicting understandings" regarding the valuation of the pre-2019 banked RECs should be considered in a rulemaking (presumably the PCIA rulemaking).[16] The PD then directs a process for tracking RECs used to meet 2026 compliance "until further Commission guidance is put into place."[17]

The PD's adoption of PG&E's proposal on an interim basis, however, fails to salvage the PD's unlawful conclusion for three reasons. First, the REC tracking process the PD directs would do nothing to ensure departed customers are appropriately compensated for the pre-2019 banked RECs PG&E proposes to use in ***2025***. Second, nothing in the law permits temporary cost shifts. The Commission must adopt a methodology here that complies with section 366.2(g). Third, the

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15 *See* D.24-12-038 at COL 1.
16 PD at 28-29.
17 *Id*. at 28-29.

PD's conclusion adopting PG&E's methodology on an interim basis is arbitrary. The PD does not support its conclusion with any reasoning or discussion of the record evidence. The PD only implies that a promise to potentially revamp the methodology in the future is sufficient to comply with the law. It is not. To the extent the Commission wishes to apply any "interim methodology" now, it should continue to value the pre-2019 banked RECs in a manner consistent with section 366.2(g) and Commission precedent.

The Commission has the record it needs to resolve this issue conclusively now. Therefore, with respect to the valuation of pre-2019 banked RECs for departed load, CalCCA recommends that the PD be modified to:

- Reject PG&E's pre-2019 banked REC zero valuation proposal which violates section 366.2(g)'s requirement that departed load customers receive the *value* of any benefits associated with PG&E's PCIA resources when those benefits remain with bundled service customers;

- Consistent with section 366.2(g), Commission precedent, and prior PG&E practice, value pre-2019 banked RECs at the applicable RPS Adder in the year in which PG&E uses the RECs for RPS compliance, when crediting customers based on their PCIA vintage, either permanently or on an "interim" basis pending consideration of the issue in Phase 2 of the PCIA proceeding;

- Direct PG&E to exhaust its post-2019 banked RECs before using any pre-2019 banked RECs towards its Minimum Retained RPS requirement; and

- Direct PG&E to track and report not only the pre-2019 banked RECs it uses to meet 2026 compliance, but also any pre-2019 banked RECs it uses to meet ***2025*** compliance. This information will allow any updated guidance from the Commission in the PCIA proceeding regarding the treatment of pre-2019 banked RECs to apply to all pre-2019 banked RECs used for compliance in *both* 2025 and 2026.

CalCCA also recommends the following additional PD modifications regarding its adoption of Southern California Edison Company's (SCE) interim Resource Adequacy (RA) Slice-of-Day (SoD) methodology:

- While CalCCA does not oppose the PD's conclusion directing PG&E to implement SCE's interim RA SoD method until the impacts of SoD on the PCIA framework are conclusively resolved in a rulemaking, the Commission should direct PG&E to file a Tier 2 advice letter detailing its implementation of SCE's method within thirty days of its final decision in this proceeding; and

- A clarifying edit on page 35 is also needed. The PD states: "PG&E has sufficient information to apply PG&E's methodology; they would apply their current methodology for calculating the RA sales, unsold and retained RA volumes." The PD should be revised to say: "PG&E has sufficient information to apply SCE's methodology; ***PG&E*** would apply ***SCE's*** current methodology for calculating the RA sales, unsold and retained RA volumes;"

CalCCA further recommends the following additional PD modification:

- The Commission should memorialize CalCCA and PG&E's uncontested agreement that data center load in CCA service territory defaults to CCA service.

II. THE PD SHOULD BE MODIFIED TO REQUIRE THAT PG&E CONTINUE VALUING PRE-2019 BANKED RECS CONSISTENT WITH PUBLIC UTILITIES CODE SECTION 366.2(G), COMMISSION PRECEDENT, AND PG&E'S EXISTING PRACTICE

The PD commits legal error by adopting PG&E's pre-2019 banked REC valuation proposal. Public Utilities Code section 366.2(g) requires that departed load customers receive the value of any benefits of PG&E's PCIA resources when those benefits remain with bundled customers. This requirement is effectuated in the PCIA framework by applying the appropriate MPB to the sources of value in the IOU's PCIA portfolio. Accordingly, per the PCIA framework, departed load receives the value of PG&E's RPS-eligible resources retained for bundled customer compliance by applying the RPS Adder to the volume of "Retained RPS" generation. What the Commission now labels as "Retained RPS" has been treated the same since the Commission created a new MPB to reflect the RPS value of certain RPS-eligible resources fifteen years ago, in D.11-12-018. Per that decision, RECs retained for the benefit of bundled customers are valued at the applicable RPS Adder. To the extent the REC was previously purchased by bundled customers at the time it was generated, the value of that REC is credited to the PCIA vintage corresponding to the year it was generated to ensure both bundled and unbundled customers are treated fairly.

PG&E's banked REC proposal in this proceeding fails to comport with section 366.2(g), Commission precedent implementing the indifference framework established in California law (including D.19-10-001 and its predecessors), and PG&E's previous practice. PG&E proposes to apply pre-2019 banked RECs towards bundled customer compliance while denying departed load their fair share of the value of those RECs. Stated simply, PG&E's current bundled customers in 2026 should be responsible for the cost of RPS compliance on their behalf in 2026. And unbundled customers should receive credit for the value of RPS attributes they previously paid for but that are now being used for bundled customer RPS compliance. If previously banked RECs are used for current bundled customer compliance, there must be a credit in PG&E's Indifference Amount that conveys the portion of the value of those RECs to departed load. This ensures that the cost of bundled customer compliance is not shifted to departed load customers and that the value of resources departed load customers paid for originally is received by those customers. By adopting PG&E's banked REC proposal, the PD permits bundled customers to apply RECs towards their RPS compliance requirements, while denying fair compensation to departed load customers who paid for a portion of those RECs. That methodology is not only unfair, it is plainly unlawful.

The fact that the PD adopts PG&E's proposal on an "interim basis" and directs a process for tracking RECs used to meet 2026 compliance does not remedy the PD's legal error. First, as CalCCA described in its comments on PG&E's Fall Update, PG&E forecasts using pre-2019 banked RECs to meet not only its 2026, but also its 2025 RPS requirements. Despite previously proposing to value pre-2019 banked RECs at the 2025 RPS Adder and credit the vintage corresponding to the year in which the banked REC was generated, PG&E now proposes to use pre-2019 banked RECs to meet its 2025 shortfall without any credit to the PCIA. The departed customers who paid for a portion of those banked RECs will never receive *any* value for those

RECs under the process the PD prescribes, which directs PG&E to track the pre-2019 banked RECs it will use to meet only *2026* compliance requirements.

Second, nothing in the law permits temporary cost shifts. Section 366.2(g) requires the Commission to ensure that departed customers receive the value of benefits that remain with bundled service customers. Neither that statute, nor any other statute, permits the Commission to deny or to keep customers indefinitely waiting for that value.

Third, the PD's conclusion adopting PG&E's proposal is arbitrary. It wholly ignores the hundreds of pages of testimony and briefing on this issue and fails to support its conclusion with any reasoning. Worse, the PD—without any explanation or reasoning—essentially reverses the Commission's decision in PG&E's 2025 ERRA Forecast case, which approved PG&E's proposal to value banked RECs (including pre-2019 banked RECs) and credit the PCIA vintages corresponding to the year in which those RECs were generated.[18] In other words, whereas the Commission approved PG&E's proposal to ***value*** the pre-2019 banked RECs it would use to meet the shortfall towards its 2025 Minimum Retained RPS requirement, the PD would *undo* that Decision (without explanation) and permit PG&E to assign ***no value*** to the pre-2019 banked RECs used to meet that very shortfall.

The PD is also internally inconsistent because it defers the merits of PG&E's and CalCCA's proposed banked REC valuation methodologies to a separate proceeding while simultaneously approving a methodology that departs from the status quo. In prior years, PG&E has consistently valued banked RECs, including pre-2019 banked RECs, at the applicable MPB in the year in which it uses those RECs, and credited the PCIA vintage(s) corresponding to the year in which the banked RECs were generated.[19] The Commission has repeatedly approved that

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[18] D.24-12-038 at COL 1.

[19] *See* CalCCA Opening Brief at 34-36.

approach.[20] It is illogical to conclude, on the one hand, that the appropriate valuation of pre-2019 banked RECs must be addressed in a future rulemaking, and adopt, on the other hand, an interim methodology that departs from an existing, Commission-approved practice. CalCCA's proposed pre-2019 banked REC valuation methodology ***is the status quo***. The Commission should therefore modify the PD to reject PG&E's pre-2019 banked REC valuation methodology, and instead require PG&E to value the RECs as required by section 366.2(g).

III. THE PD SHOULD BE MODIFIED TO REQUIRE ANY "INTERIM" PRE-2019 BANKED REC VALUATION TO BE CONSISTENT WITH SECTION 366.2(G), COMMISSION PRECEDENT, AND CURRENT PG&E PRACTICE

While the Commission has the record it needs to resolve this issue conclusively here, to the extent the Commission is inclined to address the valuation of pre-2019 banked RECs in a rulemaking, it should continue the status quo which is consistent with section 366.2(g), Commission precedent, and current PG&E practice. The Commission should also direct PG&E to exhaust post-2018 banked RECs before using any pre-2019 banked RECs towards its Minimum Retained RPS requirement. PG&E can meet over 80 percent of its projected 2025 shortfall without using the RECs in controversy in this case. Using post-2018 RECs will minimize PG&E's use of controversial RECs, which will again be the subject of litigation and Commission consideration in a rulemaking.

Finally, the Commission should direct PG&E to track and report not only the pre-2019 banked RECs it uses to meet 2026 compliance, but also any pre-2019 banked RECs it uses to meet ***2025*** compliance. Tracking those RECs will serve the same purpose as tracking the RECs used to meet 2026 compliance requirements. This information will allow any updated guidance from the

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[20] D.22-12-044 at Ordering Paragraph (OP) 1; D.23-12-022 at OP 5; D.24-12-038 at COL 1.

Commission regarding the treatment of pre-2019 banked RECs to apply to all pre-2019 banked RECs used for compliance in both 2025 and 2026.

IV. THE COMMISSION SHOULD DIRECT PG&E TO FILE A TIER 2 ADVICE LETTER DETAILING ITS IMPLEMENTATION OF SCE'S INTERIM RA SOD METHOD AND CLARIFY HOW PG&E WILL IMPLEMENT THAT METHODOLOGY

Like PG&E's proposal to change its existing banked REC valuation methodology, PG&E's proposal to modify its existing RA valuation methodology is a policy proposal and, therefore, typically beyond the scope of an ERRA Forecast proceeding. As PG&E acknowledges, the Commission may consider the impacts of SoD on the IOU's ratesetting practices in the PCIA rulemaking.[21] The PD also alludes to a forthcoming "more comprehensive decision on implementation of the SoD methodology."[22] In light of that upcoming decision, the Commission should have excluded PG&E's RA SoD proposal from the scope of this proceeding and directed PG&E to continue implementing its existing approach until the Commission comprehensively addresses the impacts of SoD implementation on the PCIA framework. Requiring parties to litigate a sweeping and highly impactful policy proposal in an expedited ERRA Forecast proceeding—including a revised version of that proposal introduced in mid-October—is highly prejudicial.

Nevertheless, in the interest of narrowing the contested issues in this case, CalCCA does not oppose the PD's conclusion directing PG&E to adopt SCE's SoD methodology on an interim basis while awaiting a more comprehensive decision on the implementation of the SoD methodology. The PD correctly observes PG&E has sufficient information to apply SCE's method. However, in light of PG&E's clear reluctance to implement SCE's method, and PG&E's failure to present the outputs of that method applied to its PCIA portfolio, the Commission should direct

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21 PG&E Opening Brief at 46.

22 PD at 34.

PG&E to file a Tier 2 advice letter within thirty days of the issuance of its final Decision, detailing its implementation of SCE's SoD method. This will allow CalCCA and other interested parties to confirm PG&E has faithfully implemented SCE's method.

Finally, the Commission should make a clarifying edit on page 35. The PD states: "PG&E has sufficient information to apply PG&E's methodology; they would apply their current methodology for calculating the RA sales, unsold and retained RA volumes." The PD's second reference to "PG&E" in that sentence is an error, and the word "their" is susceptible to multiple interpretations. In the interest of clarity, the PD should be revised to say: "PG&E has sufficient information to apply ***SCE's*** methodology; ***PG&E*** would apply ***SCE's*** current methodology for calculating the RA sales, unsold and retained RA volumes."

V. THE COMMISSION SHOULD MEMORIALIZE PG&E'S AGREEMENT THAT DATA CENTER LOAD IN CCA TERRITORY IS PRESUMED TO BE CCA LOAD

CalCCA does not object to the PD's conclusions with respect to PG&E's data center demand forecasts and did not litigate those forecasts in this case. However, CalCCA conducted discovery to evaluate PG&E's assumptions regarding data center load in CCA service territory. PG&E's responses to those discovery requests confirm that PG&E and CalCCA agree data center load located in CCA service territory (and not on a site currently served by an electric service provider) will default to CCA service.[23] The Commission should memorialize this uncontested understanding in a finding in the final Decision.

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[23] *See* Attachment A to CalCCA's Comments on PG&E's Fall Update (PG&E response to CalCCA data request 6.04).

VI. CONCLUSION

For the reasons described in these comments, CalCCA respectfully urges the Commission to adopt the change discussed herein and presented in Appendix A, and to grant any other relief the Commission deems just and reasonable.

Respectfully submitted,

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APPENDIX A

Pursuant to Rule 14.3(b) of the Commission's Rules of Practice and Procedure, CalCCA provides this Appendix setting forth proposed changes to the *Proposed Decision Approving Pacific Gas and Electric Company's 2026 Energy Resource Recovery Account Related Forecast Revenue Requirement and 2025 Electric Sales Forecast*, including proposed changes to the findings of fact, conclusions of law and ordering paragraphs. CalCCA's proposed revisions appear in underline and strike-through.

Findings of Fact

15. We find it reasonable to adopt ~~PG&E's~~ CalCCA's Pre-2019 Banked RECs methodology on an interim basis for the purpose of this decision.

16. ~~The proposal to address conflicting understandings regarding~~ A permanent methodology for the valuation of Pre-2019 Banked RECs ~~is appropriate for consideration~~ should be established in a rulemaking.

XX. Data center load located in a CCA's service territory that is not on a site currently served by an electric service provider should default to CCA service.

Conclusions of Law

XX. It is reasonable to require PG&E to file a Tier 2 advice letter detailing its implementation of Southern California Edison Company's (SCE) interim Slice-of-Day methodology.

XX. CCAs are the default service providers for data center load that is located in a CCA's service territory and is not on a site currently served by an electric service provider.

Ordering Paragraphs

4. Pacific Gas and Electric Company (PG&E) shall file a Tier 2 advice letter by February 1, 2026 to propose how they will track and report the quantity of pre-2019 banked RECs used to meet 2025 or 2026 compliance and the year those RECs were generated. The advice letter shall explain how PG&E intends to track the quantity and generation year of all Pre-2019 banked RECs it will use to meet 2025 or 2026 compliance requirements through September 30, 2026. The advice letter shall also explain how PG&E intends to forecast how many and which RECs PG&E intends to use for bundled customer compliance from October 1, 2026 through December 30, 2026.

XX. PG&E shall file a Tier 2 advice letter within thirty days of the issuance of this Decision detailing its implementation of Southern California Edison Company's (SCE) interim Slice-of-Day methodology, including the results of that methodology on the valuation of PG&E's Resource Adequacy (RA) resources and on Power Charge Indifference Adjustment (PCIA) rates.