



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

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Order Instituting Rulemaking to Improve
the California Climate Credit.

R.25-07-013

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
POST-PREHEARING CONFERENCE STATEMENT**

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SUMMARY OF RECOMMENDATIONS¹

CalCCA makes the following recommendations:

- Reject the recommendation for a Phase 1A to immediately consider only modifying the timing of Climate Credit distribution, and instead in Phase 1 consider all issues concerning Climate Credit distribution timing simultaneously to ensure all Californians are considered;
- Utilize standard proceeding processes to develop the record; and
- Develop a data tool to allow parties to assess bill impacts of proposals.

¹ Acronyms used herein are defined in the body of this document.

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The California Community Choice Association² (CalCCA) submits this Post-Prehearing Conference Statement (Post-PHC Statement) pursuant to Rule 7.2(a) of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure,³ and *Email Ruling Allowing Post-PHC Statements and Responding to Inquiry Regarding the Deadline for Notices of Intent*⁴ (Ruling), dated November 21, 2025.

I. INTRODUCTION

CalCCA appreciates Administrative Law Judge (ALJ) Maria Sotero's careful consideration of scope, schedule, and categorization of this proceeding through the agenda provided prior to the Prehearing Conference (PHC) and through discussion at the PHC. Also appreciated is the opportunity for parties to comment further through Post-PHC Statements. The

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.

³ *State of California Public Utilities Commission, Rules of Practice and Procedure, California Code of Regulations Title 20, Division 1, Chapter 1* (May 2021).

⁴ *Email Ruling Allowing Post-PHC Statements and Responding to Inquiry Regarding the Deadline for Notices of Intent*, Rulemaking (R.) 25-07-013 (Nov. 21, 2025).

Climate Credit is an important affordability measure for Californians. Careful consideration of potential impacts from any changes related to timing of the distribution and eligibility for the Climate Credit, as well as other potential changes, is crucial to ensuring the Climate Credit continues to benefit Californians as intended by the Legislature.

CalCCA's OIR Opening⁵ and Reply Comments,⁶ as well as remarks at the PHC reflected in the PHC Transcript,⁷ include a full discussion of CalCCA's recommendations on scope.

Overall, CalCCA supports the four OIR preliminary scoping items, including:

- (1) Whether the Climate Credit eligibility criteria should be modified;
- (2) Whether California Industry Assistance (CIA) implementation for emission-intensive trade-exposed (EITE) customers should be modified;
- (3) How and when the Climate Credit should be distributed; and
- (4) How should changes to the Climate Credit be communicated to customers?

In addition, CalCCA supports the additional scoping items proposed by the ALJ in the Agenda for the PHC, including:

- (1) Whether the Commission should make changes to the Climate Credit calculation methodology;
- (2) Considerations related to implementation of the provisions in Assembly Bill (AB) 1207;⁸
- (3) Considerations regarding implementation of changes to relevant California Air Resources Board (CARB) regulations;
- (4) Whether guiding principles for the proceeding should be adopted and if so, whether the following are appropriate: affordability, transparency, equity, efficiency, and support for electrification;
- (5) Whether the Commission should modify any prior Commission-adopted Climate Credit objectives, definitions, and rules; and

⁵ *California Community Choice Association's Comments on the Order Instituting Rulemaking to Improve the California Climate Credit*, R.25-07-013 (Sept. 26, 2025) (CalCCA OIR Comments).

⁶ *California Community Choice Association's Reply Comments on the Order Instituting Rulemaking to Improve the California Climate Credit*, R.25-07-013 (Oct. 13, 2025) (CalCCA OIR Reply Comments).

⁷ R.25-07-13, PHC Transcript (Nov. 21, 2025) (PHC Transcript).

⁸ Assembly Bill 1207 (Irwin, Chapter 117, Statutes of 2025).

- (6) Whether implementing the changes adopted in this proceeding will lead to increased costs for the utilities.

CalCCA also has no additional comments on its support for the OIR's categorization of the proceeding as quasi-legislative.⁹

This Post-PHC Statement addresses the following schedule issues that were introduced at the PHC: (1) whether the Commission should consider phasing the proceeding, with a Phase 1A to immediately change the timing of the fall distribution of the Climate Credit from October to August or September to address affordability during peak periods, prior to addressing all other issues starting in Phase 1B related to timing and eligibility for the Climate Credit; and (2) what processes should be incorporated into the schedule to consider all scoped issues.

As set forth below, CalCCA makes the following recommendations:

- Reject the recommendation for a Phase 1A to immediately consider only modifying the timing of Climate Credit distribution, and instead in Phase 1 consider all issues concerning Climate Credit distribution timing simultaneously to ensure all Californians are considered;
- Utilize standard proceeding processes to develop the record; and
- Develop a data tool to allow parties to assess bill impacts of proposals.

II. THE RECOMMENDATION FOR A PHASE 1A TO IMMEDIATELY CONSIDER ONLY MODIFYING THE TIMING OF CLIMATE CREDIT DISTRIBUTION SHOULD BE REJECTED IN FAVOR OF A REVIEW IN PHASE 1 OF ALL POTENTIAL MODIFICATIONS TO THE CLIMATE CREDIT TO ENSURE ALL CALIFORNIANS ARE CONSIDERED

While CalCCA supports phasing of the proceeding, given the multitude of issues that will need to be addressed, overall issues regarding timing and eligibility for distribution of the Climate Credit should be addressed simultaneously to ensure all Californians are considered. ALJ Sotero requests parties to comment on whether an expedited Phase 1A is necessary to

⁹ See CalCCA OIR Opening Comments, at 4.

immediately consider changing the timing of the fall Climate Credit distribution from October to the summer peaking months of August or September. This is presumably to address high energy bills experienced by some customers living in very hot climate zones. Phase 1A may also include legal briefing on changing the timing, as well as other requirements of Public Utilities Section 748.5. The Commission would then consider in Phase 1B whether to make broader changes not only to the timing of distribution, but also to eligibility and other issues impacting who receives the Climate Credit and when.

CalCCA opposes immediately making changes in a Phase 1A to only timing of the Climate Credit distribution. For the reasons set forth below, the Commission should consider all timing and eligibility issues simultaneously and carefully to ensure the record gets adequately developed to understand the impacts of all changes on all Californians, and to prevent customer confusion of multiple changes.

First, the impacts of moving up the fall 2026 Climate Credit from October to August or September on all customers are currently unknown. As CalCCA noted in its OIR Reply Comments, optimal timing to support bill affordability with the Climate Credit may depend on the climate zone in which a customer lives.¹⁰ Customers living in winter peaking time zones, which exist in California, may be negatively impacted by moving the Climate Credit distribution to August or September. Additionally, questions of optimal timing are intertwined with eligibility in that both have impacts on how much bill relief any given customer will receive.¹¹

¹⁰ See CalCCA OIR Reply Comments, at 6.

¹¹ *Ibid.*

The decision to modify timing should not be made hastily without sufficient time to model impacts and develop the record.¹²

Second, rushing a modification to the Climate Credit without establishing an outreach plan, followed by potential subsequent changes to the Climate Credit, could lead to unnecessary customer confusion. The Commission should also reject San Diego Gas & Electric Company's recommendation during the PHC that relaxing the timing and procedure for customer notifications (such as was done during COVID) should be considered given the affordability crisis.¹³ Adequate customer notifications of Climate Credit changes are critical to ensure customers understand where the Climate Credit came from, and how it is being distributed.

Instead, parties should immediately dive into a fulsome Phase 1 that considers issues in the following order: (1) guiding principles to frame Climate Credit issues and priorities; (2) legal briefing on issues related to PHC Discussion Question 3;¹⁴ and (3) simultaneously considering eligibility, timing, frequency, and customer communications, including examining customer bill impacts from any changes. This will ensure time is taken to simultaneously consider the impacts of proposed changes and that any modifications adopted provide maximum support and transparency to customers. After Phase 1, a subsequent phase can address implementation of any necessary changes based on revised regulations from CARB to comply with AB 1207, and other issues.

¹² Indeed, Pacific Gas and Electric Company (PG&E) stated during the PHC that a decision on timing would need to be made by March 2026 to allow changes to the distribution timing to occur in fall 2026. *See* PHC Transcript, at 52. There is simply not adequate time for the Commission to develop an adequate record to support such an important decision.

¹³ *See* PHC Transcript, at 55.

¹⁴ *Agenda for Prehearing Conference in R.25-07-013, R.25-07-013* (Nov. 2, 2025).

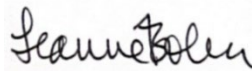
III. THE COMMISSION SHOULD CONSIDER BOTH THE USE OF STANDARD PROCEEDING PROCESSES TO DEVELOP THE RECORD AND DEVELOP A DATA TOOL TO ALLOW PARTIES TO DETERMINE THE BILL IMPACTS OF PROPOSALS

To create a strong record in this proceeding, the Commission should consider using standard processes, including but not limited to staff reports, workshops, and rulings requesting comments, in addition to developing a data tool to allow for standardized modeling of bill impacts of proposals. As is normal Commission practice, facilitating comments from parties through workshops, staff reports, and rulings will allow all stakeholders to provide their perspectives. To further strengthen the record and ensure the Climate Credit is optimized as intended, the Commission should develop a data tool to standardize how parties consider the impacts of proposals to modify the Climate Credit, as recommended in CalCCA's OIR Comments. A standardized set of outputs from a tool such as this could ensure like-for-like comparisons of proposals.

IV. CONCLUSION

This concludes CalCCA's Post-Prehearing Conference Statement. CalCCA appreciates the Commission's time and effort in resolving this proceeding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Leanne Bober".

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CALIFORNIA COMMUNITY CHOICE
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December 8, 2025