



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

Application of Southern California Edison Company
(U 338-E) for Approval of Large Power Dynamic
Pricing Rate

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Application 24-12-008 A2406014

INDUSTRIOUS LABS MOTION FOR PARTY STATUS

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Attorneys for Industrious Labs

Dated: January 7, 2026

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INDUSTRIOS LABS MOTION FOR PARTY STATUS

Pursuant to Rules 11.1 and 1.4 of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, Industrious Labs hereby respectfully submits this motion requesting party status in this proceeding.

I. Description of Party

Industrious Labs drives industrial decarbonization through policy advocacy, community engagement, and strategic analysis. In California, Industrious Labs works to reduce emissions from essential industries like the manufacturing sector, fertilizer, and cement industries. By championing clean manufacturing, Industrious Labs advances climate solutions that create union jobs, improve air quality in frontline communities, and support local economies.

II. Statement of Interest

Southern California Edison (“SCE”) is seeking authority to implement Marginal Cost-Based Dynamic Pricing Rates in compliance with the Commission’s Rulemaking (“R.”) 22-07-005 and the California Energy Commission’s Load Management Standards.

Industrious Labs has a significant interest in the Commission implementing a well-designed flexible, industrial rate that facilitates electrification to reduce the environmental and public health burden of the manufacturing sector. Industrious Labs seeks to aid the Commission in adopting a regulatory framework that is consistent with California’s climate and environmental justice policies.

Industrious Labs has advanced its interest by tracking regulatory proceedings in California to address flexible industrial rate design. For example, on August 18, 2025, Industrious Labs participated in ex parte communications alongside Sierra Club and the American Council for an Energy-Efficient Economy in R.22-07-005 concerning the Proposed

Decision establishing demand flexible rate design guidelines. In this ex parte communication Industrious Labs discussed opportunities to encourage industrial electrification while also shifting industrial load to more beneficial times of day. Industrious Labs noted that rates can significantly alleviate remaining constraints, including time-of-use periods, critical peak pricing, and removing non-coincident demand charges. Industrious Labs seeks to contribute to this current proceeding its experience and insights on coincident demand charges, real-time pricing, critical peak pricing, and better access to distributed energy resources.

Industrious Labs participation will not prejudice any party or delay the schedule. Its interests are not related to any business interests.

III. Factual and Legal Contentions

Industrious Labs intends to present factual and legal contentions relating to the alignment of the Commission’s regulatory framework for large power dynamic pricing rates and California climate and environmental justice policy. Specifically, Industrious Labs intends to show that a well-designed flexible industrial rate can play a critical role in reducing emissions from energy-intensive industries that impose significant public health burdens on nearby communities and pose a barrier to achieving California’s climate goals. Industrious Labs has significant expertise in industrial electrification policy and co-authored the report *Unlocking Industrial Electrification in California: Strategies for Electricity Rate Design and Policy Reform* in December 2025.

IV. Notice

Industrious Labs requests party status for the following individual:

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Industrious Labs requests to add the following individuals to the official service list of these consolidated proceedings as “information only”:

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V. Conclusion

For the abovementioned reasons, Industrious Labs respectfully requests that the Commission grant this Motion for Party Status in this proceeding.

Dated: January 7, 2026

Respectfully submitted,
/s/ Katrina Tomas
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