



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

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01/16/26

04:59 PM

R2401018

Comments of Emerald AI on the Proposed
Decision in Rulemaking 24-01-018. (R.24-
01-018)

Rulemaking 24-01-018

MOTION FOR PARTY STATUS OF EMERALD AI

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January 16, 2026
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I. Introduction

Emerald AI respectfully moves for party status in this proceeding in accordance with Section 1.4 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure.

II. Interest in this Proceeding

Emerald AI has a direct and substantial interest in the Commission’s consideration of Flexible Service Connections (“FSCs”), including the Proposed Decision establishing a Standard Offer Static FSC and associated Limited Load Profiles (“LLPs”). Emerald AI respectfully seeks party status in order to provide a technical and implementation-focused perspective on how FSCs can be structured to improve scalability, predictability, transparency, and compliance—particularly for large, energy-intensive customers such as data centers.

A. Emerald AI is a software company that enables large electricity customers such as data centers and other energy-intensive facilities to operate flexibly, by translating grid or utility operating constraints into verifiable, site-level load adjustments while assuring stringent performance for advanced computing workloads. Emerald AI provides an AI-powered software engine that orchestrates cloud computing and AI workloads alongside onsite energy resources such as storage to dynamically adjust power demand. Emerald AI aims to enable faster and larger power interconnections while avoiding and deferring energy infrastructure upgrades, advancing affordability, and bolstering grid reliability.

B. Emerald AI seeks to support and contribute to the Commission’s work to establish Standard Offer FSCs that deliver near-term firm capacity to expedite energization when distribution capacity constraints exist, while maintaining safety and reliability through clearly defined LLPs. Emerald AI’s participation will focus on advancing solutions that:

1. Preserve technology-neutral pathways for customer compliance, including software-based controls where appropriate;
2. Improve standardization, predictability, and scalability of FSC enrollment and LLP delivery (including standardized, electronic, machine-readable LLP formats);
3. Support practical compliance, measurement, verification, and enforcement approaches that enable broad customer participation; and
4. Strengthen data collection and reporting to enable refinement over time and quantification of system and ratepayer benefits.

Emerald AI intends to participate constructively in the proceeding through written comment and reply comment submissions and other participation as appropriate to ensure the FSC framework is workable, enforceable, and scalable for large loads and utilities alike.

III. Notice

Emerald AI consents to “email only” service and requests that the following individuals be added to the service list of Rulemaking R.24-01-018. Service of notices, orders, and other correspondence in this proceeding should be directed to Emerald AI at the address set forth below:

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IV. Conclusion

For the reasons stated above, Emerald AI respectfully requests that the Commission grant this Motion for Party Status.

Dated: January 16, 2026

Respectfully submitted,

/s/ Swasti Jain

Swasti Jain

Policy Associate

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