

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



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Order Instituting Rulemaking to Establish
Energization Timelines.

Rulemaking 24-01-018
(Filed January 25, 2024)

**REPLY COMMENTS OF CALSTART, INC. ON
PROPOSED DECISION ESTABLISHING
A STANDARD OFFER FOR
FLEXIBLE SERVICE CONNECTIONS**

Alex Pfeifer-Rosenblum
Regulatory Director
CALSTART, Inc.
48 S Chester Ave Pasadena CA, 91106
Telephone: (626) 744-5622
E-mail: apfeiferrosenblum@calstart.org

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Pursuant to Rule 14.3 of the California Public Utilities Commission (“CPUC” or “Commission”) Rules of Practice and Procedure, CALSTART, Inc. (“CALSTART”) submits these Reply Comments on the *Proposed Decision Establishing a Standard Offer for Flexible Service Connections* (“Proposed Decision”) issued on December 24, 2025.

I. The Record Supports the Preliminary Power Assessment Process as Essential to Scaling Freight Electrification

CALSTART reiterates its strong support for the Commission’s determinations regarding Preliminary Capacity Assessments (“PCAs”), which have been a longstanding barrier to freight electrification in California. Simply put, it will not be possible to scale freight electrification in California if project developers cannot promptly, reliably, and affordably receive preliminary estimates of power availability before investing in a full application for service. The Proposed Decision’s findings—that PCAs are a necessary step in informing a customer’s decision to invest potentially hundreds of thousands of dollars in a service application,¹ and that comparable preliminary assessment processes are commonly offered at utilities nationwide and often completed on significantly shorter timeframes²—are well-supported by the record. Formalizing and streamlining the PCA process therefore represents a critical and appropriate step forward.

¹ Comments of CALSTART, Inc. on Administrative Law Judge’s Ruling Directing Utilities to File Additional Information Providing Transparency on Current Static Flexible Service Connection Offerings (July 8, 2025) (“CALSTART Comments on FSC Transparency Ruling”) at 8-11.

² Opening Comments of CALSTART, Inc. on Administrative Law Judge’s Ruling Clarifying Next Steps for Flexible Service Connections, Modifying Phase 2 Schedule, and Requesting Party Comments (March 13, 2025) (“CALSTART Opening Comments on Next Steps Ruling”) at 14;

In its comments, PG&E raises concerns regarding the Commission’s directives to formalize and streamline the PCA process. However, several of these concerns do not appear to fully reflect either the existing record or the role PCAs play in enabling informed customer investment decisions.

PG&E suggests that the PCA process would duplicate elements of the Intake process and would not eliminate later verification efforts. As the record makes clear, however, the purpose of the PCA is not to replace Intake, later application verification efforts, or engineering and design review; as PG&E recognizes, the purpose of the PCA is for critical information sharing to “shift...earlier”³ so that customers can determine whether a project is viable before committing substantial resources to a full application. Providing earlier access to this information serves a distinct and necessary function from later-stage assessments.

PG&E also expresses concern that formalizing PCAs could divert resources from activities that directly advance project delivery, while yielding only modest incremental customer benefit. The record supports the opposite conclusion. Streamlining and formalizing PCAs enables customers to make informed decisions about whether to proceed with projects at all—a prerequisite for efficient deployment—and avoids unnecessary investment in projects that ultimately cannot move forward.

PG&E also states that formalizing the PCA would “yield preliminary estimates that are not sufficiently accurate or durable without qualified engineering and planning review” or “may be valid only for a short period of time.” However, as we have noted previously in this proceeding, project developers are not asking for “a fully binding, detailed engineering solution guaranteed to remain unchanged for five years.”⁴ Rather, they are asking for preliminary estimates that reflect those that PG&E already provides prior to a customer’s decision to invest in a service application.⁵

Reply Comments of CALSTART, Inc. to Administrative Law Judge’s Ruling Directing Parties to Respond to Questions on Energization Issues (June 28, 2024) at 4-5; CALSTART Comments on FSC Transparency Ruling at 5.

³ Pacific Gas and Electric Company’s (U 39 E) Opening Comments on Proposed Decision Establishing a Standard Offer for Flexible Service Connections (January 16, 2026) (“PG&E Opening Comments on Proposed Decision”) at 8.

⁴ CALSTART Comments on FSC Transparency Ruling at 10.

⁵ Pacific Gas and Electric Company’s (U 39 E) Response to Questions in Sections 3.2 Through 3.7 of Administrative Law Judge’s Ruling Directing Utilities to File Additional Information

PG&E points to its Automatic Capacity Evaluator (“ACE”) initiative as addressing some of these concerns. However, ACE operates during Intake and therefore does not provide the pre-application visibility that project developers require.⁶ In addition, while CALSTART supports the continued development of Load ICA tools, the record reflects that data accuracy limitations currently prevent these tools from serving as investment-grade substitutes for PCAs.⁷ Finally, PG&E’s ACE initiative does not address the need for a standardized, preliminary assessment process across the utilities, including at Southern California Edison Company (“SCE”).

Finally, PG&E states that implementing PCAs would require additional costs, staffing, and process investments. However, CALSTART notes that PG&E already provides preliminary capacity information to customers prior to their application for service.⁸ In addition, the 30-day timeline for PCAs reflects PG&E’s existing practice,⁹ and the PCA process is substantially similar to the interconnection pre-application report already provided to generation customers “at a fraction of the customer cost.”¹⁰ As such, these concerns are not substantiated by the record. Moreover, PG&E will have the opportunity to address cost considerations in its forthcoming Advice Letter filings.

The Commission should not defer Step 0 reporting timelines as PG&E requests, nor should it omit PCA data fields or reporting requirements as requested by San Diego Gas & Electric Company (“SDG&E”). Timely reporting is necessary to ensure accountability and implementation of a process that utilities already perform today.

II. Clarification Is Needed Regarding Pauses Due to Upstream Upgrades

In its comments, SCE states that D. 24-09-020 “unequivocally mandates” that utilities pause all energization projects that cannot be completed in the ordinary course due to capacity constraints, rather than allowing discretion to pause downstream work. CALSTART raised concern earlier in this proceeding that utilities could reasonably interpret D. 24-09-020 in this

Providing Transparency on Current Static Flexible Service Connection Offerings (June 13, 2025) (“PG&E Response to FSC Transparency Ruling”) at 14.

⁶ PG&E Opening Comments on Proposed Decision at 8; PG&E Tier 1 Advice Letter 7490-E (January 21, 2025) at 4.

⁷ Proposed Decision Establishing a Standard Offer for Flexible Service Connections (December 24, 2025) (“Proposed Decision”) at 35.

⁸ PG&E Response to FSC Transparency Ruling at 14.

⁹ *Id.* at 16.

¹⁰ Proposed Decision at 53.

manner, and that clarification may also be required that utilities should resume downstream work in parallel with anticipated completion of the upstream upgrade.

CALSTART maintains that the record does not support a firm mandate requiring downstream work to occur only after completion of upstream upgrades. Such an interpretation would be inconsistent with the intent of SB 410 and would unnecessarily delay energization where substantial efficiencies could be achieved through parallel construction aligned with the anticipated completion of the upstream upgrade.

SCE's comments underscore the need for the Commission to clarify that pausing downstream work is an option rather than a requirement, and that where feasible, downstream work should resume in parallel to align with the expected completion of upstream upgrades rather than proceeding sequentially.

III. Options Without Telemetry and DERMS Should Be Maintained

SCE states that they intend to pursue telemetry for certain projects, as well as DERMS-based approaches over the long-term. It is thus important that options that avoid telemetry and DERMS are maintained. As documented in this proceeding, CALSTART members have expressed concern about potential utility movement toward telemetry- and DERMS-based control frameworks: shared charging sites have business models that depend on guaranteeing charging to the customer, and therefore cannot agree to utility-controlled DERMS.¹¹ Requiring telemetry would substantially and unnecessarily increase the complexity, time, and potentially the cost of implementing static Flexible Service Connections ("FSCs"), which do not require telemetry. CALSTART agrees with SCE that telemetry offerings would be more appropriately resolved in the High DER Proceeding.

IV. The Standard Offer Should Apply to SDG&E, which Faces Capacity Constraints

CALSTART previously recommended that the Standard Offer apply to SDG&E and PacifiCorp the first time that they encounter a capacity constraint. However, our members have since noted that they are already receiving responses from SDG&E indicating capacity

¹¹ Reply Comments of CALSTART, Inc. on Administrative Law Judge's Ruling Clarifying Next Steps for Flexible Service Connections, Modifying Phase 2 Schedule, and Requesting Party Comments (March 27, 2025) ("CALSTART Reply Comments on Next Steps Ruling") at 6-7.

constraints. As such, CALSTART recommends that the Proposed Decision apply to SDG&E upon approval by the Commission.

V. CONCLUSION

The Proposed Decision marks an important step towards streamlining and scaling PCAs and FSCs to accelerate energization timelines. We appreciate the Commission for its leadership and attention to the needs of freight throughout this process. We look forward to collaborating with the Commission, our members, the utilities, and other stakeholders to advance energization timelines and facilitate on-time achievement of California’s decarbonization goals.

Respectfully submitted,

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/s/ Alex Pfeifer-Rosenblum
Alex Pfeifer-Rosenblum
Regulatory Director
CALSTART, Inc.
48 S Chester Ave Pasadena CA, 91106
Telephone: (626) 744-5622
E-mail: apfeiferrosenblum@calstart.org