



**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)

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E) REPLY COMMENTS ON
PROPOSED DECISION ESTABLISHING A STANDARD OFFER FOR FLEXIBLE
SERVICE CONNECTIONS**

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Dated: January 23, 2026

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I. INTRODUCTION

Pursuant to Rule 14.3(d) of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, Pacific Gas and Electric Company (“PG&E”) respectfully submits these reply comments to Parties’ Opening Comments on the December 24, 2025 proposed *Decision Establishing a Standard Offer for Flexible Service Connections* (“PD”).

II. PG&E REPLY COMMENTS

1. A Standard Form Agreement Best Serves Safety, Flexibility, and Affordability

PG&E maintains that a Standard Form Agreement, rather than a full tariff, is the most practical and least burdensome vehicle for implementing Flexible Service Connections (“FSC”). As SDG&E observes,¹ a tariff-based Standard Offer introduces rigidity and administrative overhead without improving energization outcomes, while a Standard Form allows IOUs to refine processes based on experience, incorporate customer-specific nuances, and adapt and apply safety requirements without repeated tariff filings.

Moreover, PG&E shares other Parties’ concerns² regarding the cost and implementation burden associated with a tariff-based framework, including expanded reporting obligations, technology changes, and new intake requirements that may or may not be cost-beneficial for customers. The prescriptive requirements would add system costs and administrative complexity at a time when affordability remains a central Commission objective. There is a limited record in this proceeding on the potential costs of implementing the proposed offering and reporting.³ PG&E

¹ SDG&E Opening Comments, p. 2-3.

² PAO Opening Comments, p. 2-5; TURN Opening Comments, p. 1-3; SDG&E Opening Comments, p. 3-5.

³ PG&E notes that no record was developed on cost estimates for any of the items in the PD (and no discussion of cost recovery appears in the PD), but preliminary analysis suggests they could be substantial.

therefore recommends that this offering be considered in the High DER proceeding, where a robust record on costs and benefits can be developed before formulating a longer-term implementation plan. If the Commission adopts an offering in this proceeding, PG&E believes that a Standard Form Agreement with minimal, efficient reporting would help mitigate costs while delivering a clear, Commission-approved construct that preserves the operational discretion needed to efficiently manage safety, system health, and customer engagement.

2. UL 3141 Cost and Implementation Complexity Underscore Why PG&E’s Selective “Trust and Verify” Approach Must Be Preserved

IREC acknowledges that UL 3141-certified PCS devices are “likely cost prohibitive for many customers” and not yet widely available.⁴ This recognition directly reinforces PG&E’s position that its current processes include the appropriate level of flexibility and discretion and the PD would unnecessarily replace them with rigidity.⁵ FSC success to date has depended on a small, carefully curated population of customers, not universal customer availability or enrollment.

3. Emergency Ratings Are Engineering Limits, Not Policy Choices

IREC’s argument that “the Commission should obtain more information about whether the framework outlined in the [PD] would allow customers without certified PCSs to access meaningful additional capacity”⁶ overlooks the fundamental fact that emergency ratings represent the upper bound of equipment tolerance and exceeding them risks damage and/or accelerated deterioration.

Emergency ratings are not discretionary settings that can be relaxed to facilitate incremental Load Limiting Profile (“LLP”) headroom. As PG&E has stated, they must apply regardless of whether a customer’s controls are certified. FSCs are bridging tools offered in locations with known upstream constraints, where system health and safety margins are already thin. If an inquiry into the application and/or development of emergency ratings is undertaken, PG&E recommends that it be deferred to a proceeding that addresses inputs/outputs of the Distribution Planning Process, such as the High DER proceeding.

⁴ IREC Opening Comments, p. 2.

⁵ PG&E Opening Comments, p. 1.

⁶ IREC Opening Comments, p. 2.

4. A Universal Offering May Require More Robust Technical Requirements

PG&E agrees with SCE⁷ that if the Commission intends to expand FSC into a universal, nondiscretionary offering, then more stringent and standardized technical requirements will be needed to maintain system safety. As SCE notes, the UL 3141 standard allows up to a 30-second response time and places no limit on the number of exceedance events per day, meaning a certified PCS could momentarily overshoot its import limit repeatedly, creating cumulative thermal stress on distribution equipment. PG&E has raised similar concerns regarding cumulative heating, equipment sensitivity, and the absence of frequency protections in UL 3141. For a universal Standard Offer, additional technical requirements are needed, such as SCE's proposal to require two-second response performance.⁸

5. Seasons Should Be Location Specific and Not One-Size-Fits-All

PG&E appreciates that IREC and CALSTART support customizing LLP seasons by customer location.⁹ PG&E agrees. A one-size-fits-all mandate for three uniform seasons is inconsistent with operational reality – seasonality should remain flexible.

6. PCA Should Demonstrate a Clear Benefit to Ratepayers

PG&E agrees with TURN's concerns about costs and whether PCA/Step 0 can be shown to benefit ratepayers without first quantifying the full incremental costs of implementation and administration.¹⁰ That concern is well founded because a separate, pre-application PCA would overlap with Commission-directed automation already underway to achieve the same intent, specifically PG&E's Automatic Capacity Evaluator ("ACE"). For the PCA to be useful, it would need to replicate the extensive data collection work of the formal application Intake process. PG&E needs nearly all the same detailed information to produce a meaningful PCA result, which raises significant concern about the incremental customer benefit of such a process that must occur separate from and before the application. This would divert utility resources that are likely better deployed in the existing process, and also create a confusing, duplicative experience for customers.

⁷ SCE Opening Comments, p. 3.

⁸ Id.

⁹ IREC Opening Comments, p. 13; CALSTART Opening Comments, p. 11.

¹⁰ TURN Opening Comments, p 2.

A preliminary check result is short-lived, does not quantify upgrade costs, and cannot be converted into a contract; it would in no way reduce the need for customers to submit their information again through a formal application, especially if there are capacity constraints with associated mitigation costs. Finally, PCA would require a new (pre)application and fee structure, new portal upgrades, added staffing, and process investments outside the existing workflow. Until the Commission evaluates these incremental costs and considers the (lack of) potential savings, the PCA should be deferred (to HighDER) and/or reworked to match PG&E's current process, which integrates the preliminary analysis into the energization application process. As CALSTART notes,¹¹ the PD appears to have erred in its development/proposal of a pre-application PCA process to the extent it intended to follow PG&E's process, which is not separate from the application process.

7. LLPs Should Remain Power Based

PG&E agrees with SCE that LLPs must remain power based, as distribution system modeling is grounded in *power* flow analysis, not energy.¹² Like SCE, PG&E has no defined or scalable method to design "energy optimized" LLPs, and customers do not provide the detailed information required to produce such profiles. Requiring utilities to optimize LLPs for energy would add significant complexity and labor, without evidence of customer demand or system benefit.

8. Creating Site-Specific LLPs Requires More Information than a PCA Can Provide

While PG&E appreciates CALSTART's desire to provide the maximum amount of capacity information to customers as soon as possible in the interconnection process,¹³ PG&E cannot provide what is not available. The creation of customer-specific LLPs requires detailed study and analysis of site-specific hourly load forecasts, a process that is too time consuming and resource intensive for a PCA. The PCA is intended to quickly answer a single question: "is the full capacity requested by the customer available at peak?" As such, the PCA is quick, nonbinding, and, by design, incomplete. It does not replace the need for or reduce the burden of an application for service or an interconnection study, which collect details (e.g., hourly loading) necessary for LLP creation.

¹¹ CALSTART Opening Comments, p. 4-5.

¹² SCE Opening Comments, p 10.

¹³ CALSTART Opening Comments, p. 6.

