

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



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Own Motion to Consider Renewal of the Electric
Program Investment Charge Program.

Rulemaking 19-10-005

**CALIFORNIA ENERGY COMMISSION COMMENTS
ON PROPOSED DECISION ADOPTING ELECTRIC PROGRAM INVESTMENT
CHARGE STRATEGIC OBJECTIVES**

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SUBJECT INDEX OF RECOMMENDED CHANGES

Pursuant to Rule 14.3(b) of the California Public Utilities Commission (CPUC, Commission) Rules of Practice and Procedure, the California Energy Commission (CEC) provides the following index of its recommended changes to the Proposed Decision Adopting Electric Program Investment Charge Strategic Objectives, issued by Administrative Law Judge Thomas J. Glegola on January 23, 2026.

The CEC respectfully requests that Strategic Objective 1 be modified by removing the specific reference to the investor-owned utility (IOU) cost of medium- and heavy-duty charging infrastructure. The CEC believes that this modification would clarify inclusion of non-grid-side costs in alignment with CPUC feedback and ratepayer benefits.

The CEC respectfully requests that Strategic Objective 10 be modified to (1) broaden interconnection and energization processes to include “clean energy resources” rather than exclusively “distributed energy resources” (DERs); (2) include reductions in interconnection and energization process timelines beyond the point of application “approval”; and (3) omit the word “and” that appears to be a typographical error.

The CEC respectfully requests that Strategic Objective 13 be modified to include “near-term planning” to ensure that EPIC can support research and technology development that inform a comprehensive suite of climate adaptation needs.

The CEC respectfully requests that reporting for the EPIC Equity Research, Development, and Demonstration (RD&D) Framework should leverage existing reporting avenues, such as the EPIC Annual Report and EPIC Database, rather than instituting new standalone reporting requirements.

The CEC respectfully requests the Commission to clarify that the proposed EPIC annual report workshop does not increase the number of required annual EPIC workshops, that workshop authority remains with the EPIC Administrators, and that Tier 2 Advice Letter review and disposition of EPIC annual reports remain a ministerial process that do not require additional staff-led workshops or stakeholder processes.

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I. INTRODUCTION

The California Energy Commission (CEC) appreciates the opportunity to provide comments on the California Public Utilities Commission (CPUC, Commission) January 23, 2026, *Proposed Decision Adopting Electric Program Investment Charge Strategic Objectives* (Proposed Decision or PD). These comments are submitted in accordance with CPUC Rules of Practice and Procedure (CPUC Rule(s)), Rule 14.3. The CEC is pleased to provide input on efforts to continually strengthen and enhance the EPIC Program and maximize ratepayer benefits. The CEC looks forward to continuing to build on the program's success in shaping California's clean energy economy and enabling the state to meet its energy and climate goals more affordably, effectively, and efficiently.

II. DISCUSSION

The Proposed Decision (1) adopts 13 Strategic Objectives for the EPIC 5 investment plan cycle (2026 – 2030), (2) adopts the EPIC Equity Research, Development, and Demonstration (RD&D) Framework, (3) authorizes CPUC staff to facilitate a new annual public workshop to review the EPIC Administrator's annual reports, and (4) authorizes an EPIC Program evaluation in 2028. The CEC will respond to each in turn.

A. The CEC Supports the 13 Strategic Objectives and Proposes Modifications to Strategic Objectives 1, 10, and 13.

The CEC is generally supportive of the proposed Strategic Objectives. While discussing potential metrics related to the Strategic Objectives is informative in guiding investment plan development and eventual project selection and implementation, the CEC asserts that defining metrics is more appropriate at the research and development project level than at the objective level. The metrics identified in the PD are generally more suited for large-scale technology deployment activities as opposed to the research, development, and demonstration projects that are precursors to large-scale deployment. The CEC appreciates the flexibility provided in the PD for Administrators to propose their own metrics for specific projects.¹

The CEC offers specific feedback and recommendations on Strategic Objectives 1, 10, and 13, below.

¹ Proposed Decision at 34.

1. Strategic Objective 1: Reducing Medium- and Heavy-Duty Vehicle Charging Infrastructure Costs

On December 3 – 5, 2025, the CPUC hosted a series of workshops for EPIC Administrators to present early-stage EPIC 5 initiatives and solicit CPUC Subject Matter Expert (SME) feedback as part of the EPIC 5 Investment Plan development process. In its SME feedback to Administrators after the workshops, the CPUC sought an increased focus on technologies that could reduce costs for medium- and heavy-duty charging infrastructure broadly, rather than exclusively on the grid side. The CEC agrees that reducing customer-side costs should be in the scope of Strategic Objective 1 because these costs directly impact market willingness to invest in the charging infrastructure needed to cost-effectively achieve the state’s transportation electrification goals. Therefore, the CEC recommends removing the specific reference to the “IOU” cost of medium- and heavy-duty charging infrastructure to clarify inclusion of non-grid-side costs in alignment with CPUC SME feedback and ratepayer benefits.

a. Recommended Revision to Strategic Objective 1:

The EPIC program will accelerate innovation, demonstration, and innovative approaches to deployment that support the reduction of the ~~IOU~~ cost of medium- and heavy-duty charging infrastructure installations, and associated IOU cost of grid upgrades by a stretch goal of 50% by 2035 to achieve the state’s transportation electrification goals in a cost-effective manner.

2. Strategic Objective 10: Expediting and Streamlining Interconnection and Energization Processes

The CEC recommends several edits to improve clarity and flexibility of this strategic objective: first, the CEC recommends broadening interconnection processes to cover all clean energy resources and not limiting them to distributed energy resources (DERs). Accelerating interconnection of clean resources at the transmission level is a critical challenge for achieving the state’s clean energy goals, with substantial implications for ratepayer affordability.² The CEC acknowledges that there are different rules, entities, and processes involved in interconnection at the transmission level compared to the distribution level; however, this is not a good reason for its exclusion from the scope of EPIC. With inclusion of interconnection at both grid infrastructure

² California Energy Commission. “The Transmission Challenge,” <https://www.energy.ca.gov/programs-and-topics/topics/california-transmission-system/transmission-challenge>.

segments in Strategic Objective 10, EPIC Administrators can pursue measurable benefits, to the extent feasible, for both distribution and transmission level projects.

Second, the CEC recommends removing the word “approval” when referring to energization timelines. This modification would clarify that Strategic Objective 10 is inclusive of reductions in interconnection and energization process timelines beyond the point of application approval, including those associated with upstream grid upgrades triggered by DER or new load projects.

Third, the CEC recommends removing “and,” which appears to be a typographical error.

a. Recommended Revision to Strategic Objective 10:

The EPIC Program will support acceleration of the development, testing, and integration of innovative technology, communication protocols, and modeling approaches to streamlining interconnection and energization processes for ~~DER~~ **clean energy resources** and new loads including ~~and~~ electric vehicle charging infrastructure, with a goal to demonstrate the capability to significantly reduce interconnection and energization ~~approval~~ timelines under multiple high DER penetration and electrification scenarios, with a priority for addressing challenges in Disadvantaged and Vulnerable Communities.

3. Strategic Objective 13: Cost-Effective Grid Hardening for Long-Term Climate Impacts

The CEC recommends incorporating nearer-term planning into Strategic Objective 13 to ensure that EPIC can support research and technology development that informs a suite of climate adaptation needs (including the range of timescales articulated by CPUC through the Adaptation Rulemaking, R.18-14-019) and enables the state to be fully prepared for the longer-term challenges to come. While the Climate Adaptation and Vulnerability Assessments emphasize multi-decade planning horizons, utilities also face urgent and evolving climate-driven risks — such as wildfire threats — that require actionable insights on much shorter timeframes to support general rate case filings and Wildfire Mitigation Plans.³ Ultimately, meeting our nearer-term adaptation needs can help to build the tools and frameworks to accurately predict and prepare for resilience and reliability in the longer-term. Including “near” explicitly clarifies that EPIC-funded research may address resilience challenges that require planning prior to 2033, thereby improving our chances for success post-2033.

³ California Public Utilities Commission. “Climate Adaptation,” <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/climate-change>.

a. Recommended Revision to Strategic Objective 13:

By 2033, the EPIC program will develop and demonstrate data, tools, technologies, and frameworks that improve **near- and** long-term planning and achieve more cost-effective operational practices and capital investments for grid hardening to maintain grid resilience and reliability to long-term climate impacts, with a focus on increasing affordability, reducing outage risk, and reducing social burdens of outages.

B. The CEC Supports Adoption of the EPIC Equity Research, Development, and Demonstration Framework; Recommends Leverage of Existing Reporting Avenues; and Requests Clarification on Reporting Metrics

The PD adopts an EPIC Equity RD&D Framework, which includes the principles of prioritization, engagement, metrics, access, and outreach.⁴ The PD also proposes that EPIC Administrators report on equity investments, as well as direct Disadvantaged and Vulnerable Communities (DVCs) and tribal impacts, and keep this reporting up-to-date on a quarterly basis.⁵

The CEC supports the adoption of the Equity RD&D Framework and believes that it will serve as a valuable tool for all Administrators to track ongoing and meaningful participation from DVCs and tribes during EPIC investment plan development and implementation. However, the CEC strongly recommends the Commission leverage existing reporting avenues, such as the EPIC Annual Report and EPIC Database, rather than instituting any new standalone reporting requirements. This will enable administrative efficiency by using existing processes and procedures with which Administrators are already familiar and in which they have invested considerable time and energy, rather than developing new ones that could come with opportunity costs and redundancy.

Additionally, the PD proposes a set of data for Administrators to report on, but also states that the data are not limited to the items identified in the PD.⁶ The CEC encourages a streamlined and efficient approach to any additional data collection to avoid administrative burdens and unnecessary costs. Moreover, the CEC requests that the Commission specify the data it is requesting from the Administrators, either in the PD, with additional time for Administrators to comment, or by clarifying that CPUC staff will collaborate with Administrators to co-develop the scope of this data reporting. The Administrators need certainty around reporting requirements to properly update, develop, and implement appropriate data collection, tracking and reporting methodologies,

⁴ Proposed Decision at 96-97.

⁵ Ibid.

⁶ Proposed Decision at 97.

infrastructure, and procedures. Leaving reporting requirements open-ended or subject to frequent changes would burden the Administrators with additional intensive and often redundant processes, resulting in increased administrative costs and inefficient use of ratepayer funds.

C. EPIC Annual Report Workshop

The PD authorizes CPUC staff to facilitate a new annual public workshop to review the EPIC Administrators' annual reports prior to CPUC staff's disposition of the associated Tier 2 Advice Letters and indicates that this workshop may count as one of the mandatory annual EPIC Administrator workshops.⁷ The CEC contends that this is an unnecessary and duplicative additional layer in the process that may inappropriately assign CPUC staff the authority for facilitating a workshop for which each Administrator is held responsible. EPIC Administrators are required to hold two public workshops each year, and each Administrator should be accountable for meeting this requirement and have full authority to do so.

The CEC has already established a robust framework for EPIC stakeholder engagement that meets the requirement and provides ample opportunities for CPUC and public engagement and knowledge sharing. D.12-05-037 requires two annual workshops,⁸ and D.15-04-020⁹ explicitly designates the EPIC Symposium as one of these workshops. The Symposium provides a well-established, high-attendance forum for reviewing EPIC progress, results, and future plans that are included in EPIC annual reports.¹⁰ The four Administrators also regularly convene another joint workshop coordinated by the IOUs during the year. In practice, the CEC regularly exceeds the minimum engagement requirements through, for example, public scoping workshops, tribal roundtables, Disadvantaged Communities Advisory Group meetings, and CEC business meetings in which EPIC annual reports are publicly presented for CEC adoption. The PD does not demonstrate that a separate annual report-specific workshop would meaningfully advance the requirements already satisfied by these existing forums.

Additionally, the CEC encourages the CPUC to keep EPIC public engagement distinct from the Tier 2 Advice Letter procedures. Under General Order 96-B, General Rule 7.6.1, the CPUC reviews and subsequently approves or rejects Tier 2 Advice Letters through a ministerial written

⁷ Proposed Decision at 102.

⁸ Decision 12-05-037, Ordering Paragraph 15.

⁹ Decision 15-04-020, Ordering Paragraph 27.

¹⁰ California Energy Commission. "Electric Program Investment Charge Symposium," <https://www.energy.ca.gov/programs-and-topics/programs/electric-program-investment-charge-epic-program/electric-program>.

process that determines whether the filing complies with existing statutory or Commission requirements.¹¹ While the CEC understands that the CPUC may decide not to review and dispose of the Tier 2 Advice Letter until after reviewing the EPIC Database or learning more about the content of the annual report, the CEC requests that the CPUC affirm that it will not require an additional public workshop or other staff-led process as a condition of this disposition.

In sum, the CEC urges the Commission to affirm that: (1) the PD does not enable an additional required annual EPIC workshop; (2) EPIC workshop authority remains with the Administrators, consistent with D.12-05-037, Ordering Paragraph 15; and (3) Tier 2 Advice Letter review and disposition procedures remain unchanged. This approach ensures transparency and stakeholder participation that leverages existing channels and processes without imposing unnecessary new or duplicative obligations and costs.

D. Future EPIC Evaluation

The PD delegates to CPUC staff the authority to facilitate the next evaluation of EPIC by 2028 and states that the evaluation may inform the CPUC's consideration of whether to continue EPIC past its current 2030 authorization.¹² The CEC appreciates the Commission proactively laying the groundwork for determining the next stages of EPIC beyond its current 2030 authorization. The CEC strongly encourages the Commission to continue its proactive planning with an aim to determine the future of EPIC prior to the end of the EPIC 5 investment cycle. This could provide critical continuity of support for clean energy innovation, enable administrative resource planning for EPIC Administrators, and send a long-term market and policy signal that California is committed to technology advancement for mid-century economy-wide decarbonization. Similarly, clarity on the future of EPIC could also provide an important signal to researchers and technology innovators that California will continue to be a premier location to generate and implement breakthrough ideas and innovations that can lead the way to a clean energy economy. When considering the first renewal of EPIC, the CPUC adopted its decision to extend EPIC to 2030 prior to the end of the EPIC 3 investment cycle.¹³ The CEC encourages the Commission to follow similar precedent when

¹¹ California Public Utilities Commission General Order 96-B, General Rule 7.6.1.

¹² Proposed Decision at 18.

¹³ CPUC Decision 20-08-042 renewed EPIC through December 31, 2030, and was approved on August 27, 2020, prior to the end of the EPIC 3 investment cycle.

considering the future of EPIC beyond 2030 and looks forward to working with the Commission, the IOU Administrators, and others to support this effort.

III. CONCLUSION

The CEC appreciates the opportunity to comment on the Proposed Decision. Considering the foregoing discussion, the CEC supports adoption of the Proposed Decision with the above recommended modifications.

Dated this 12th day of February 2026.

Respectfully submitted,

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APPENDIX A

CEC RECOMMENDED CHANGES TO THE PROPOSED DECISION

The CEC's recommended changes to the PD are provided below. Additions are shown in underline and bold font, and deletions are in strikethrough.

PD Appendix A, Page A-1, Strategic Objective 1:

The EPIC program will accelerate innovation, demonstration, and innovative approaches to deployment that support the reduction of the ~~IOU~~ cost of medium- and heavy-duty charging infrastructure installations, and associated IOU cost of grid upgrades by a stretch goal of 50% by 2035 to achieve the state's transportation electrification goals in a cost-effective manner.

PD Appendix A, Page A-3, Strategic Objective 10:

The EPIC Program will support acceleration of the development, testing, and integration of innovative technology, communication protocols, and modeling approaches to streamlining interconnection and energization processes for ~~DER~~ **clean energy resources** and new loads including ~~and~~ electric vehicle charging infrastructure, with a goal to demonstrate the capability to significantly reduce interconnection and energization ~~approval~~ timelines under multiple high DER penetration and electrification scenarios, with a priority for addressing challenges in Disadvantaged and Vulnerable Communities.

PD Appendix A, Page A-4, Strategic Objective 13

By 2033, the EPIC program will develop and demonstrate data, tools, technologies, and frameworks that improve **near- and** long-term planning and achieve more cost-effective operational practices and capital investments for grid hardening to maintain grid resilience and reliability to long-term climate impacts, with a focus on increasing affordability, reducing outage risk, and reducing social burdens of outages.