



**FILED**

04/08/26

10:52 AM

P2509004

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

Order Instituting Rulemaking to Enhance Demand Response in California.

Rulemaking 25-09-004

**ADMINISTRATIVE LAW JUDGE’S RULING MODIFYING SCHEDULE ON BRIDGE YEAR FUNDING ISSUE AND POSING SUPPLEMENTAL QUESTIONS**

This ruling modifies the schedule established by the March 10, 2026, *Administrative Law Judge’s Ruling Seeking Comments on Demand Response Staff Proposal on Bridge Year Funding and Modifying the Schedule for the Bridge Year Funding Issue* (First Bridge Year Ruling). Additionally, this ruling poses supplemental questions in addition to those raised in the First Bridge Year Ruling. Comments in response to this ruling and the First Bridge Year Ruling are invited to be filed and served no later than April 30, 2026, with reply comments filed and served no later than May 21, 2026.

**1. Background**

**1.1. Procedural Background**

On February 12, 2026, the Assigned Commissioner’s Scoping Memo and Ruling included bridge year funding as a scoped issue.

On March 10, 2026, the First Bridge Year Ruling was issued. The First Bridge Year Ruling, among other things, invited comments on the Energy Division’s staff proposal – titled “IOUs Bridge Year Funding” (Staff Proposal).

## **1.2. Background on Out-of-Market Emergency Demand Response Programs**

In response to the August 2020 heat storm, and to make more resources available on an expedited basis to support the grid in anticipation of extreme weather events in summer of 2021-2023, the California Public Utilities Commission (CPUC) established the Emergency Load Reduction Program (ELRP), a pilot program.<sup>1</sup> The ELRP expansion, implemented for the 2022 summer season, incorporated participation options for behind-the-meter energy storage resources as well as export-capable electric vehicle resources.<sup>2</sup>

Similarly, in 2022, the Demand Side Grid Support (DSGS) program was established by the California Legislature in Assembly Bill (AB) 205. DSGS was established to “incentivize dispatchable customer load reduction and backup generation operation as on-call emergency supply and load reduction for the state’s electrical grid during extreme events,”<sup>3</sup> and was intended to be an additional emergency demand response program for resources that were not eligible to participate in CPUC-jurisdictional demand response programs. Later that year, AB 209 expanded DSGS eligibility to include customers of the Investor Owned Utilities – provided that those customers were not already enrolled in a CPUC-jurisdictional demand response program.<sup>4</sup> DSGS is implemented by the California Energy Commission (CEC).<sup>5</sup>

---

<sup>1</sup> Decision (D.) 21-03-056.

<sup>2</sup> D.21-12-015.

<sup>3</sup> Public Resources Code section 25792(a).

<sup>4</sup> Public Resources Code section 25792(b).

<sup>5</sup> Public Resources Code section 25792(a).

**2. Schedule**

This ruling modifies the schedule established in the First Bridge Year Ruling as follows:

<b>First Amended Bridge Year Funding Schedule</b>		
<b>Event</b>	<b>Date with Evidentiary Hearings</b>	<b>Date without Evidentiary Hearings</b>
Opening Comments on Bridge Year Funding	April 30, 2026	
Reply Comments on Bridge Year Funding	May 21, 2026	
Joint Case Management Statement on Bridge Year Funding	June 11, 2026	
Evidentiary hearing on Bridge Year Funding, if needed	July 2026	-
Opening Briefs on Bridge Year Funding, if needed	August 2026	July 16, 2026
Reply Briefs on Bridge Year Funding, if needed	August or September 2026	August 6, 2026
Proposed Decision on Bridge Year Funding	Quarter 3 or 4, 2026	
Commission Decision on Bridge Year Funding	No sooner than 30 days after Proposed Decision.	

Requirements for the June 11, 2026, joint case management statement are provided in the First Bridge Year Ruling.

**3. Request for Formal Comment**

When responding to questions in First Bridge Year Ruling and this ruling, parties shall organize and submit their comments in the same order in which the issues and questions are presented in the rulings. The parties' responses to the supplemental questions in this ruling should come after the questions posed in

the First Bridge Year Ruling. Further, parties shall indicate which question they are responding to from the rulings. For example, for the first question in the First Bridge Year Ruling, parties should indicate they are responding to question “4.1.a.”

Parties are invited to file and serve opening comments no later than April 30, 2026, and reply comments no later than May 21, 2026.

#### **4. Questions for Parties**

Parties are directed to respond to the specific questions below. The supplemental questions presented in this ruling start at 4.1.h., as questions in the First Bridge Year Ruling ended at 4.1.g.

##### **4.1. Supplemental Bridge Year Questions**

Currently, the ELRP pilot is funded through the end of 2027. The CEC’s DSGS program guidelines note uncertainty about the program’s long-term funding, given that additional funding is needed for the program to continue beyond the upcoming 2026 program season.<sup>6</sup> Given the uncertainty on the continuity of the budgets for these programs, this ruling asks the following supplemental questions:

- h. Should the ELRP pilot be extended as-is or with modifications? Should there be a sunset date?
- i. If the ELRP pilot should be extended with modifications, should there be design changes made to it that align with the “Guiding Principles” staff proposal?<sup>7</sup> Please explain any specific design changes recommended as part of the response.

---

<sup>6</sup> See CEC, Revised Proposed Draft DSGS Program Guidelines, 5th Edition (clean) at i, available at <https://efiling.energy.ca.gov/GetDocument.aspx?tn=268854&DocumentContentId=106037>.

<sup>7</sup> Appendix to Order Instituting Rulemaking 25-09-004, September 29, 2025, available at <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M582/K074/582074542.PDF>.

- j. Are there lessons or elements from DSGS that could inform improving ELRP pilot design to benefit all ratepayers?

**IT IS RULED** that:

1. Interested parties may file and serve comments in response to this ruling and the First Bridge Year Ruling by no later than April 30, 2026.
2. Interested parties may file and serve reply comments in response to this ruling and the First Bridge Year by no later than May 21, 2026.
3. The schedule for the bridge year funding issue is modified as set forth above.

Dated April 8, 2026, at San Francisco, California.

/s/ BRANDON GERSTLE

Brandon Gerstle  
Administrative Law Judge