

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



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Application of Southern California Edison  
Company (U 338-E) to Establish Marginal Costs,  
Allocate Revenues, and Design Rates.

Application 24-03-019  
(Filed March 29, 2024)

**OPENING COMMENTS OF CALSTART, INC.  
ON PROPOSED DECISION REGARDING  
SOUTHERN CALIFORNIA EDISON COMPANY'S  
APPLICATION TO ESTABLISH MARGINAL COSTS,  
ALLOCATE REVENUES AND DESIGN RATES**

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April 9, 2026

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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 Opening Comments on the *Proposed Decision Regarding Southern California Edison Company’s Application to Establish Marginal Costs, Allocate Revenues, and Design Rates* (“Proposed Decision”) issued on March 20, 2026.

**I. THE PROPOSED DECISION SHOULD INCLUDE CALSTART AS A SETTLING PARTY TO THE ELECTRIC VEHICLE RATE DESIGN SETTLEMENT AGREEMENT**

CALSTART appreciates the Commission’s approval of the joint motion for approval of the Electric Vehicle Rate Design Settlement Agreement (“EV Rate Design Settlement Agreement”) filed on September 15, 2025. CALSTART was a signatory to the Settlement Agreement and joined in filing the joint motion; however, CALSTART is omitted from the list of settling parties in the Proposed Decision.

For accuracy and completeness of the record, CALSTART respectfully requests that it be included in the description of settling parties on page 49 of the Proposed Decision and in Ordering Paragraph 10.

**II. THE PROPOSED DECISION MARKS AN IMPORTANT STEP TOWARD ENSURING PROJECT VIABILITY FOR MEDIUM- AND HEAVY-DUTY FLEET CUSTOMERS**

CALSTART appreciates that the EV Rate Design Settlement Agreement extends the energy-only rate structure for Rates TOU-EV-8 and TOU-EV-9 through 2030, providing needed rate stability as markets for medium- and heavy-duty (“MHD”) fleet electrification continue to

mature. The record reflects substantial support for this extension, including testimony indicating that the energy-only structure is producing positive net margins and net benefits to all ratepayers.<sup>1</sup>

CALSTART's testimony raised concerns that post-2030 demand charge phase-ins, if not appropriately structured, could discourage today's emerging fleet customers from pursuing electrification and undermine project economics during early utilization periods.<sup>2</sup> Critically, this risk is not limited to future customers, but directly impacts investments decisions being made today. Energization delays remain common, and fleet utilization ramps typically require a grace period following energization. As such, customers developing projects today must evaluate the rate environment they will face upon energization and during the early years of operation. Absent appropriate rate design protections, customers face the risk of investing in infrastructure that becomes economically untenable during the early years following project completion, which may deter projects from moving forward today.

The Load Factor Based Rate Option adopted in the Settlement Agreement appropriately targets continued energy-only treatment to lower load factor customers beginning on the date of energization rather than a fixed calendar deadline.<sup>3</sup> This approach provides greater certainty for projects under development today and mitigates the risk of abrupt rate impacts during early operational years.

The current Load Factor Based Rate Option—which is available to customers with load factors up to 15 percent or for a maximum of three years following energization, whichever occurs first—provides a structured transition framework for emerging fleet customers. As fleet markets continue to evolve and additional data becomes available, the Commission will have the opportunity in future proceedings to evaluate whether future refinements are warranted to

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<sup>1</sup> Public Advocates Office Testimony Chapter 8, Prepared Testimony on Small and Large Commercial Rate Design in Southern California Edison's 2025 General Rate Case Phase 2, served on parties in A. 24-03-019 on November 22, 2024 at 8-11 to 8-13.

<sup>2</sup> See: Errata to Direct Testimony of Alex Pfeifer-Rosenblum on Behalf of CALSTART, Inc. in Southern California Edison's 2025 General Rate Case, Phase 2, served on parties in A. 24-03-019 on July 10, 2025; Rebuttal Testimony of Alex Pfeifer-Rosenblum on Behalf of CALSTART, Inc. in Southern California Edison's 2025 General Rate Case, Phase 2, served on parties in A. 24-03-019 on July 23, 2025.

<sup>3</sup> See: Joint Motion for Adoption of the Electric Vehicle Rate Design Settlement Agreement.

maintain alignment between rate design, deployment realities, and statewide electrification objectives.

Together, the extension of the energy-only rates through 2030 and the adoption of a load-factor-based on-ramp provide meaningful near-term progress while preserving the opportunity for further refinement in the Company's next Phase II General Rate Case proceeding.

CALSTART therefore agrees that, as modified for accuracy to include CALSTART among the settling parties, the Settlement Agreement satisfies Rule 12.1(d), and is reasonable in light of the whole record, consistent with law, and in the public interest.

Respectfully submitted,

April 9, 2026

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## **Appendix of Changes**

Ordering Paragraph 10: The joint motion for approval of the Electric Vehicle Rate Design Settlement Agreement filed on September 15, 2025 by Southern California Edison Company, Public Advocates Office at the California Public Utilities Commission, CALSTART, Inc., EVgo Services LLC, Small Business Utilities Advocates, Electrify America, LLC, Solar Energy Industries Association, Terawatt Infrastructure, Inc., Vehicle-Grid Integration Coalition and Walmart Inc. is approved.