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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Consider Strategies and Guidance for
Climate Change Adaptation.

Rulemaking 18-04-019

**ASSIGNED COMMISSIONER'S RULING
PROVIDING QUESTIONS FOR
COMMENT ON POLICY FRAMEWORK**

On August 18, 2025, the California Public Utilities Commission (Commission) requested comments on Task 6. Some of the comments received expressed interest in ensuring that Climate Adaptation was considered more granularly and flexibly when the Commission considers individual applications, in addition to addressing climate adaptation in individual General Orders and through large scale planning efforts.

This ruling provides questions to develop the record on how the Commission should take steps to adequately incorporate climate adaptation considerations in the review of energy applications as guided by the staff proposed Climate Adaption Framework attached to this ruling as Attachment A.

Responses to the questions set forth in this ruling and general comments and suggested edits to the attached staff proposal are due April 30, 2026, and replies are due May 15, 2026.

The staff proposed Climate Adaptation Framework is intended to address the scale, complexity, uncertainty, and interdependencies of climate change and

the need for establishing a uniform collection of information and data on the use of climate adaptation hazard and risk requirements by electric and gas investor-owned utilities (IOUs). The staff proposal provides policy guidance to IOUs for reporting on climate adaptation measures identified in applications and filings for which climate adaptation is a relevant consideration, as described in the staff proposal. The staff proposal was developed by analyzing governmental climate adaptation plans, academic work, existing Commission General Orders and decisions, workshop input, and consultations with Commission divisions. The staff proposal identifies five policy areas in which climate adaptation is a critical consideration:

1. Repetitive loss and failure
2. Site selection
3. Design and engineering
4. Equipment tolerance
5. Climate risk modeling

The staff proposal recommends that IOUs provide information as part of applications or filings related to infrastructure planning, construction, maintenance, risk management, and emergency response plans, including, but not limited to, applications or filings pursuant to General Orders 131-E, 166, 177, and Decision 21-06-034 explaining how the application or filing considered the climate adaptation considerations posed by any of these five policy areas that are relevant to the application or filing. The staff proposal additionally provides guidance to IOUs to help determine when an application or filing is covered by this Framework, what information should be provided pursuant to the Framework, and sets forth ongoing reporting requirements to enable the

Commission and IOUs to refine the Framework based on experience and outcomes.

1. Questions

Approaches to implementing the Climate Adaptation Framework

1. Should the Commission establish the Climate Adaptation Framework as set forth in the staff proposal as a set of requirements for IOUs to include when filing applications before the Commission? If so, what criteria should the Commission establish to determine whether an IOU has demonstrated sufficient consideration of climate adaptation concerns in an application or filing covered by the Framework?
2. What metrics should the Commission require IOUs to report so the Commission is able to measure utility progress in implementing climate adaptation actions under the Climate Adaptation Framework? Refer to the reporting requirements described in the staff proposal as a starting point. Should the Commission specify additional reporting metrics, refine the metrics described in the staff proposal, or remove reporting elements described in the staff proposal?

Applicability and project thresholds

3. Should this Climate Adaptation Framework apply only to certain applications and filings before the Commission? If so, which ones and why? Conversely, should this framework not apply to certain applications and filings? If so, which ones and why?
4. Should the attached proposal include screening criteria for determining when consideration of climate adaptation is not necessary for an application? If so, describe what potential screening criteria should be included.
5. Should this Climate Adaptation Framework apply only to applications with specific capital expenditure thresholds and/or applications that have a high risk for catastrophic hazards/safety risk? If so, provide recommendations on

what threshold of capital expenditure or catastrophic hazards/safety risk the Commission should establish or a methodology for determining the threshold.

Technical refinement of policy areas

7. Are the definitions provided for the five policy areas (e.g., “Equipment Tolerance,” “Repetitive Loss and Failure,” “Climate Risk Modeling,” “Site Selection,” and Design and Engineering”) sufficient both technically and in subject matter? If not, how should they be improved?
8. Should the discussion of the five policy areas in the Climate Adaptation Framework be tailored to clearly address specific categories of applications? If so, which categories of applications and how should the discussion be tailored?
9. Should IOUs be required as part of the Climate Adaptation Framework to include analysis of the relative impact or magnitude of each identified climate adaptation consideration covered by the Framework? Should IOU applications or filings be required to demonstrate prioritization of climate adaptation considerations based on this impact analysis or simply address all imputed policy areas as explained in the staff proposal?
10. Does the Climate Adaptation Framework adequately provide guidance on the unique climate vulnerabilities of emerging infrastructure technologies, such as utility-scale battery storage or electric vehicle charging hubs?

Framework scope

10. How should the Commission consider variations in the scale, scope, and specificity of different applications when considering the level of detailed climate adaptation analysis expected to accompany applications?

Small and Multi-Jurisdictional Utilities

11. Should the Climate Adaptation Framework requirements be scaled or modified for small and multi-jurisdictional utilities (SMJUs), independent transmission developers, or

other types of load-serving entities versus the large electric and gas IOUs to ensure compliance is not unduly burdensome? If so, what characteristics of regulated utilities should the Commission consider in scaling the requirements? Should there be separate compliance options or phased rollout schedules for SMJUs, independent transmission developers, or other load-serving entities?

12. Should the Commission consider amending the scope of the Framework to include other utilities, such as water IOUs, in a successor proceeding or another procedural venue?

IT IS RULED that Parties may file responses to the questions set forth in this ruling by April 30, 2026, and may file reply comments by May 15, 2026.

Dated April 13, 2026, at San Francisco, California.

/s/ DARCIE L. HOUCK

Darcie L. Houck
Assigned Commissioner