



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

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Application of PACIFIC GAS AND
ELECTRIC COMPANY (U 39 E) for Review
of the Disadvantaged Communities – Green
Tariff, Community Solar Green Tariff and
Green Tariff Shared Renewables Programs

Application No. 22-05-022
(Filed May 31, 2022)

And Related Matters

Application No. 22-05-023
Application No. 22-05-024

**OPENING COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) TO
THE PROPOSED DECISION IMPLEMENTING CALIFORNIA SHARED
RENEWABLES PORTFOLIO**

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SUBJECT INDEX OF RECOMMENDED CHANGES

Pursuant to Rule 14.3(b) of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, Pacific Gas and Electric Company ("PG&E") provides the following Subject Index of Recommended Changes in support of its Opening Comments on the Proposed Decision Implementing California Shared Renewables Portfolio.

For the new Community Renewable Energy ("CRE") tariff, the final decision should:

- Give the investor-owned utilities ("IOUs") 120 days (instead of 60) to submit the CRE tariff and implementation plan required by Ordering Paragraph ("OP") 1 and defer the marketing plan to a later advice letter following approval of the tariff and implementation plan;
- Authorize the IOUs to open a sub-account within their respective CRE balancing accounts to track costs incurred as of the issue date of the decision in connection with implementation, administration, marketing, education, and outreach associated with the new program, with recovery through the Public Purpose Program ("PPP") charge.
- Authorize a program sunset if, after implementation, no developer has executed a ReMAT PPA for a new project to participate in the program over a three year period.

For the Modified Green Tariff, the final decision should authorize a cost tracking and recovery mechanism to track not only implementation costs associated with the modified program, but also the costs of the renewable resources used to serve program subscribers.

For the transition of IOU program reporting to the Distributed Generation Statistics ("DG Stats") website, the final decision should specify that the IOUs shall make this transition within 90 days of receiving notification from the DG Stats vendor that the platform is available and ready to receive and process program reporting.

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I. INTRODUCTION

Pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure, Pacific Gas and Electric Company (“PG&E”) provides these opening comments to the Proposed Decision of Administrative Law Michelle Cooke Implementing California Shared Renewables Portfolio (“PD”).

PG&E supports the PD’s objective of expanding access to renewable energy through the California Shared Renewables Portfolio while avoiding costs shift to nonparticipants. Through these comments, PG&E asks the Commission to make targeted refinements to the decision to facilitate implementation of the new Community Renewable Energy (“CRE”) tariff, Modified Green Tariff, and transition of program reporting to the Distributed Generation Statistics (“DG Stats”) website. The proposed refinements are detailed in Section II.A, B. and C., below, and specific proposed modifications to the Conclusions of Law and Ordering Paragraphs are reflected in Appendix A to these comments.

II. DISCUSSION

A. PG&E Recommends that the PD Incorporate Minor Changes Related to the CRE Tariff

PG&E is supportive of the Decision’s continued focus on developing a CRE program without cost shift or burdening nonparticipants. PG&E believes there is an opportunity to work with the California Energy Commission (“CEC”) to help ensure this program is a viable Title 24 alternative to individual household solar installations, while maintaining nonparticipant indifference. That said, and as detailed more fully below, PG&E recommends that the PD be modified to (1) give the investor-owned utilities (“IOUs”) additional time to submit the implementation advice letter and defer the marketing plan to a later advice letter once the tariff and implementation plan are approved, (2) authorize each IOU to establish a sub-account within their existing CRE balancing accounts to record program implementation costs, and (3) provide a pathway for program sunset.

1. PG&E Requests that the IOUs Be Given 120 Days to Submit the CRE Tariff and Implementation Plan Required by Ordering Paragraph (OP) 1 and Defer the Marketing Plan to a Later Advice Letter

OP 1 of the PD directs the IOUs to each submit a Tier 2 advice letter within 60 days of issuance of the final decision to submit the new CRE tariff, including a program implementation and marketing plan. While the PD and D.24-05-065 set forth a high-level framework for the CRE tariff, key implementation details such as defining the bill credit mechanism, jointly authoring the new tariff in compliance with existing Renewable Marketing Adjusting Tariff (“ReMAT”) structures, clarifying the subscription process, etc., will need to be developed, which will require coordination among the IOUs and potentially with other stakeholders. PG&E requests that the utilities be given more than 60 days to complete this work and recommends the Commission allow 120 days from issuance of the decision for submission of an advice letter detailing the tariff and implementation plan. This additional time will enable the utilities to better coordinate, and ensure that their program details are consistent and implementable.

PG&E also requests that the required marketing plan be deferred to a subsequent advice letter once the CRE tariff and program implementation details are approved. This will ensure that

the marketing plan is consistent and aligns with the final approved tariff and implementation plan, and avoid re-work to the extent that either the tariff or implementation plan are changed through the approval process. Therefore, PG&E recommends that the final decision direct the IOUs to submit their marketing plans via a separate Tier 2 advice letter within 60 days of approval the CRE tariff and implementation plan advice letter.

2. PG&E Requests Authorization to Open a Sub-Account in the Existing CRE Program Balancing Account to Track Costs

PG&E appreciates that the PD leverages ReMAT as the foundation for the CRE Tariff, which should help limit implementation costs. Nonetheless, implementation, marketing, and administering the new tariff and subscription program will not be without costs. PG&E therefore requests authorization to open a sub-account within its existing balancing account for the CRE Program to track costs incurred as of the issue date of the decision in connection with implementation, administration, marketing, education, and outreach associated with the new program, with recovery through the Public Purpose Program (“PPP”) charge.

While PG&E recognizes that recovery of implementation costs through the PPP imposes costs on all customers, including non-participants, it is reasonable to do so for at least two reasons. First, only recovering costs from program participants may deter participation and have the counterproductive result of increasing the bill for low-income participants who are supposed to benefit from the program. Second, spreading these costs across all customers, instead of concentrating them on a comparably small population of program participants, will substantially minimize the impact on customer bills.

Therefore, PG&E recommends that the PD be updated to provide that PG&E is authorized to submit a Tier 1 advice letter within 30 days of issuance of the decision to open a sub-account within the CRE balancing account to track costs as discussed above.

3. The Decision Should Specify a Pathway for Program Sunset

PG&E is hopeful that the CRE tariff will result in new renewable projects for customer subscription. However, as the Commission recognized in D.24-05-065 for the Disadvantaged

Communities Green Tariff and the Modified Green Tariff, it is prudent to specify a pathway for program sunset in the event that it does not attract interest from developers and/or customers. For example, in D.24-05-065 the Commission adopted a sunset for both programs whereby if remaining enrolled capacity falls below 500 kW or there has been no participation by developers in two consecutive solicitations, a utility is authorized to submit a Tier 1 advice letter informing the Commission that solicitations have been suspended.¹ PG&E recommends that a similar sunset be adopted for the CRE program, i.e., if after program implementation no developer has executed a ReMAT PPA for a new project to participate in the program over a three year period, the utility can file a Tier 1 advice letter with the Commission closing the program.

B. PG&E’s Recommended Clarifications for the Modified Green Tariff

1. The Decision Should Authorize a Cost Tracking and Recovery Mechanism for the Modified Green Tariff

PG&E appreciates that the PD addresses cost recovery for the legacy Green Tariff, however, it does not address tracking and recovery of costs associated with the Modified Green Tariff. As detailed in comments on the June 5, 2024 Administrative Law Judge’s Ruling Directing Responses to Questions Regarding Implementation of D.24-05-065 (the “June 2024 ALJ Ruling”), the utilities need a balancing account mechanism to track the costs associated with the modified program.² This is necessary to track not only implementation costs associated with the modified program, but also the costs of the renewable resources used to serve program subscribers. Therefore, PG&E requests that the decision authorize each of the utilities to open a balancing account via a Tier 1 advice letter for tracking the following: (1) incremental program administration costs, (2) the cost of the renewable attributes provided to modified Green Tariff participants, (3) customer billed revenues for the modified Green Tariff program, (4) true-up of the attribute price, and (5) interest.

¹/ D.24-05-065, OP 3(j) and 5(f).

²/ See PG&E Opening Comments on the June 2024 ALJ Ruling, pp. 33-34; Southern California Edison Company Opening Comments on the June 2024 ALJ Ruling, pp. 38-39; San Diego Gas & Electric Company Opening Comments on the June 2024 ALJ Ruling, p. 23; PG&E Reply Comments on the June 2024 ALJ Ruling, pp. 17-18.

2. **PG&E Appreciates the PD’s Flexibility Around the Implementation Timeline for the Modified Green Tariff**

OP 4 of the PD specifies that each IOU, in submitting their advice letter modifying their Green Tariff, shall “include a timeline and transition plan for moving legacy Green Tariff customers to the modified Green Tariff....” PG&E’s anticipated advice letter will provide such a timeline and plan, however, PG&E notes now that its timeline may be extended.

There are significant rate design and resource integration considerations that need to be coordinated amongst internal teams and the IOUs to ensure a successful transition to a successor tariff. PG&E and the IOUs will also need to establish a transition plan for current Green Tariff customers to ensure non-participant indifference and that existing customers continue to understand and be satisfied with their participation in the Green Tariff.

PG&E’s multi-year Billing System Modernization Initiative (BMI) will limit PG&E's ability to implement structural changes,³ such as the Modified Green Tariff program, that require modifications to PG&E's billing system.⁴ If the Commission were to adopt any new rate proposals or modifications to existing rates in PG&E’s billing systems, programming may need to be delayed until after the Billing Modernization Initiative has been finalized and then prioritized among the previously adopted rate projects already in the rates implementation pipeline.⁵

^{3/} A structural change would require coding and testing of new billing parameters and/or calculations, whereas a value change would entail a numerical adjustment to a parameter that already exists in PG&E’s billing systems. Structural changes to the billing system require new variables, formulas, or billing determinants to calculate bills, which involve extensive coding and testing. Examples of structural changes would be adding a new charge or changing the hours associated with Time of Use Periods. Value changes entail a numerical adjustment to a rate parameter that is already coded in PG&E’s billing systems, such as changing prices associated with an existing rate structure. Value changes do not require extensive coding changes and can be implemented much more quickly.

^{4/} The specific timelines and project details of the Billing Modernization Initiative are presented in A.24-10-014, Exh. PG&E-01, p. 5-34, lines 3-10. The updates to the BMI timeline are presented in A.24-10-014, Supplemental Testimony (March 17, 2026), p.1, line 14 to p. 25, line 15.

^{5/} A.24-09-014, Exh. PG&E-3, p. 10-1, line 26 to p. 10-4, line 18.

C. The Timeline for Reporting on the DG Stats Website Specified in OP 8 Should Be Modified

OP 8 of the PD directs the IOUs to transition their reporting for DAC-GT, Modified Green Tariff and CRE program (collectively, the “Green Access Programs”) to the DG Stats website within 180 days of issuance of the decision. PG&E appreciates the transition from separate program reporting to the DG Stats website, as we anticipate that it will be administratively efficient and informative to stakeholders. However, the timeline for transitioning to DG Stats is largely outside of PG&E’s control. PG&E will continue to work diligently to provide timely responses to inquiries related to the DG Stats data submission template and platform, but it is the DG Stats vendor (a third party) who will need to ensure that the platform is capable of accommodating this reporting. PG&E therefore recommends that the PD be modified to specify that the IOUs shall transition their reporting to DG Stats within 90 days of receiving notification from the DG Stats vendor that the platform is available and ready to receive and process Green Access Program reporting.

III. CONCLUSION

PG&E appreciates the opportunity to provide its opening comments on the PD and encourages the Commission to adopt the proposed modifications and clarifications described above and listed in Appendix A.

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APPENDIX A

Proposed Modifications to Findings, Conclusions and Orders

(Deletions in ~~strikeout~~; additions underlined)

| Conclusions of Law | Proposed Modification |
|---|--|
| <p>13. It is reasonable to direct participating program administrators to complete the transition of required reporting to DGStats, or its successor domain, within 180 days after the issue date of this decision.</p> | <p>13. It is reasonable to direct participating program administrators to complete the transition of required reporting to DGStats, or its successor domain, within <u>180 90</u> days <u>after the issue date of this decision of receiving notification from the DGStats vendor that the platform is available and ready to receive and process program reporting.</u></p> |

| Ordering Paragraph | Proposed Modification |
|--|--|
| <p>1. Within 60 days after the issue date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall each submit a Tier 2 advice letter to propose a new customer Community Renewable Energy tariff in accordance with Decision 24-05-065 and this decision. This Tier 2 advice letter shall also include a program implementation and marketing plan as described in this decision.</p> | <p>1. <u>a.</u> Within <u>60 120</u> days after the issue date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall each submit a Tier 2 advice letter to propose a new customer Community Renewable Energy tariff in accordance with Decision 24-05-065 and this decision. This Tier 2 advice letter shall also include a program implementation and marketing plan as described in this decision.</p> <p><u>b. Within 60 days of approval of the CRE tariff and implementation plan advice letter, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall submit their marketing plans via a Tier 2 advice letter.</u></p> |
| <p>3. This decision supersedes Decision (D.) 15-01-051 Ordering Paragraph 10 (required monthly and annual reports); Ordering Paragraph 11 (required annual program forums); and Ordering Paragraphs 15 and 17 (required advisory groups) with respect</p> | <p>3. This decision supersedes Decision (D.) 15-01-051 Ordering Paragraph 10 (required monthly and annual reports); Ordering Paragraph 11 (required annual program forums); and Ordering Paragraphs 15 and 17 (required advisory groups) with respect</p> |

| Ordering Paragraph | Proposed Modification |
|---|--|
| <p>to program oversight of San Diego Gas & Electric Company, Southern California Edison Company, and Pacific Gas and Electric Company’s programs. The modified Green Tariff reporting and meeting requirements in D.15-01-051 Ordering Paragraphs 10, 11, 15, and 17 shall cease as of the issue date of this decision.</p> | <p>to program oversight of San Diego Gas & Electric Company, Southern California Edison Company, and Pacific Gas and Electric Company’s programs. The modified Green Tariff reporting and meeting requirements in D.15-01-051 Ordering Paragraphs 10, 11, 15, and 17 shall cease as of the issue date of this decision.</p> |
| <p>8. Within 180 days after the issue date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Program Administrators of tariffs in the California Renewable Energy Portfolio shall complete their transition of required reporting of Disadvantaged Communities-Green Tariff, Green Tariff, and community renewable energy program data to the California Distributed Generation Statistics website.</p> | <p>8. Within 180 <u>90</u> days after the issue date of this decision <u>of receiving notification from the DG Stats vendor that the DG Stats platform is available and ready to receive and process program reporting</u>, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Program Administrators of tariffs in the California Renewable Energy Portfolio shall complete their transition of required reporting of Disadvantaged Communities-Green Tariff, Green Tariff, and community renewable energy program data to the California Distributed Generation Statistics website.</p> |
| | <p>New OP:</p> <p><u>The IOUs are authorized to each submit a Tier 1 advice letter within 30 days of issuance of the decision to open a sub-account within their respective CRE balancing accounts to track costs incurred beginning as of the issue date of the decision in connection with implementation, administration, marketing, education, and outreach associated with the new CRE program, with recovery through the Public Purpose Program (“PPP”) charge.</u></p> |
| | <p>New OP:</p> <p><u>If, after implementation of the CRE Program, no developer in a utility service area has executed, over a three</u></p> |

| Ordering Paragraph | Proposed Modification |
|--------------------|---|
| | <p><u>year period, a ReMAT PPA for a new project to participate in the program, that utility can file a Tier 1 advice letter with the Commission closing the program.</u></p> |
| | <p>New OP:</p> <p><u>In connection with the Modified Green Tariff, the IOUs are each authorized to open a balancing account via a Tier 1 advice letter for tracking the following: (1) incremental program administration costs, (2) the cost of the renewable attributes provided to modified Green Tariff participants, (3) customer billed revenues for the modified Green Tariff program, (4) true-up of the attribute price, and (5) interest.</u></p> |