FILED
05/22/26
04:59 PM
A2411007

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company (U 39 E) for Approval of Electric Rule No. 30 for Transmission-Level Retail Electric Service.	A.24-11-007

CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S REPLY BRIEF

Leanne Bober,
Director of Regulatory Affairs and Deputy General Counsel
Katy Morsony,
Senior Counsel and Manager of Strategic Policy Initiatives

CALIFORNIA COMMUNITY CHOICE ASSOCIATION
1121 L Street, Suite 400
Sacramento, CA 95814
(510) 980-9459
E-mail: regulatory@cal-cca.org

May 22, 2026

TABLE OF CONTENTS

SUMMARY OF RECOMMENDATIONS[1]

In this proceeding, CalCCA recommends:

- The Commission should adopt the Partial Settlement Agreement addressing information sharing, reporting and coordination of service agreed to by PG&E, the Public Advocates Office, CalCCA, and the Sierra Club. The Partial Settlement proposes a negotiated resolution of many of CalCCA's issues in this proceeding.
- PG&E's proposed PRA and TSR requirements should be rejected as unnecessary given the CCA role as default generation provider. The Commission should reject PG&E's attempt to withhold customer information.
- Should the Commission decline to adopt the Partial Settlement, the Commission should adopt the proposal presented in CalCCA's Opening Brief:
    - The information sharing protocols adopted in the Interim Decision should be made permanent. PG&E should be directed by the Commission to send new Rule 30 applications to the impacted CCA within 20 business days of receipt, and to provide customers with notice of CCAs' role as generation provider, and that PG&E will be sharing customer information with the CCA. This information will continue to be protected under the existing PG&E-CCA NDA and Commission requirements without additional privacy requirements.
    - Rule 30 Applications should be shared with PG&E's procurement department at the same time they are made available to the CCA.
    - PG&E should be directed to share preliminary load information with an impacted CCA at the same time as it is provided to the CEC.
    - The Commission should continue the quarterly reporting required under the Interim Decision, clarifying that the confidential reports should be shared with impacted CCAs under the existing PG&E-CCA NDA. Projects included in the Quarterly Reports should be assigned a unique project identifier that can be used to track the project through the design and construction process.
    - The current PG&E-CCA NDA, along with existing Commission confidentiality requirements, is sufficient to protect customer information and PG&E's proposed new NDA should be rejected. To the extent that the Commission determines a new NDA is required, it should direct the parties to collaborate on a new Rule 30 specific NDA.
    - Coordination of service incorporating PG&E's proposal for customers to provide notice of their choice of generation service provider within 45 days of the PES is not properly within the scope of this proceeding or necessary. To the extent that the Commission orders coordination of service, it should direct CalCCA and PG&E to submit a Tier 2 Advice Letter implementing the coordination of service proposal offered in CalCCA's Opening Brief.

---

[1] Acronyms used herein are defined in the body of this document.

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company (U 39 E) for Approval of Electric Rule No. 30 for Transmission-Level Retail Electric Service.	A.24-11-007

CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
REPLY BRIEF

The California Community Choice Association[2] (CalCCA) submits this Reply Brief regarding the *Application of Pacific Gas and Electric Company (U 39 E) for Approval of Electric Rule No. 30 for Transmission-Level Retail Electric Service*[3] (Application) pursuant to Rule 13.12 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure;[4] the *Administrative Law Judge's Ruling Establishing Proceeding Schedule,* dated January 9, 2026; and the *E-mail Ruling PG&E Rule 30 Application Administrative Law Judge Establishing New Proceeding Schedule and Ruling on Motions,*[5] dated February 27, 2026.[6]

---

2 California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance of Southern California, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

3 *Application of Pacific Gas and Electric Company (U 39 E) for Approval of Electric Rule No. 30 for Transmission-Level Retail Electric Service*, Application (A.) 24-11-007 (Nov. 21, 2024).

4 *State of California Public Utilities Commission, Rules of Practice and Procedure, California Code of Regulations Title 20, Division 1, Chapter 1* (May 2021).

5 *E-mail Ruling PG&E Rule 30 Application Administrative Law Judge Establishing New Proceeding Schedule and Ruling on Motions,* A.24-11-007 (Feb. 17, 2026).

6 The new proceeding schedule was issued after the proceeding schedule was suspended on November 21, 2025. *See Administrative Law Judge's Ruling Suspending Proceeding Schedule,* A.24-11-007 (Nov. 21, 2025) (suspending procedural schedule set forth in *Email Ruling Modifying the Procedural Schedule,* A.24-11-007 (June 19, 2025)); and *Assigned Commissioner's Scoping Memo and Ruling on*

I. INTRODUCTION AND EXECUTIVE SUMMARY

Pacific Gas and Electric Company (PG&E) proposes a new Rule 30 tariff for customers requesting interconnection from PG&E at transmission level voltages between 50 kilovolts (kV) and 230 kV.[7] CalCCA intervened in this proceeding expressly to address the requirements of information sharing in light of the role of community choice aggregators (CCA) as default generation service providers for the new loads in their service territories, including those interconnecting under the new Rule 30 tariff.[8]

PG&E and CalCCA have reached a Partial Settlement Agreement outlining the requirements for information sharing related to these new large loads.[9] The Partial Settlement submitted to the Commission on May 7, 2026, directs that:

- PG&E will send new Rule 30 Interconnection Applications, and any transmission interconnection under other PG&E Rules, to the impacted CCA within 20 business days of receipt, and will provide customers with notice of the affected CCA's role as generation provider and that PG&E will be sharing customer information with the CCA.[10] This information will be protected under a new PG&E-CCA non-disclosure agreement (NDA) already agreed to by CalCCA and PG&E.[11]
- Rule 30 Applications will be shared with PG&E's procurement department at the same time they are made available to the CCA.[12]
- PG&E will share preliminary load information with an impacted CCA at the same time as it is provided to the California Energy Commission (CEC).[13]

Pacific Gas and Electric Company's Request to Implement a New Electric Rule 30 Tariff, A.24-11-007 (Mar. 11, 2025).

7 *Application of Pacific Gas and Electric Company (U 39 E) for Approval of Electric Rule No. 30 for Transmission-Level Retail Electrical Service*, A.24-11-007 (Nov. 21, 2024), at 1 (Application).

8 The Scoping Memo includes Issue 4.b. in the scope of this proceeding: "What information-sharing requirements should PG&E adopt to ensure that the CCAs affected by Rule 30-related load growth can meet projected demand in their service areas." *Assigned Commissioner's Scoping Memo and Ruling*, A.24-11-007 (Mar. 11, 2025) (Scoping Ruling), at 8.

9 *See Joint Motion for Adoption of Partial Settlement Agreement of Pacific Gas and Electric Company, the Public Advocates Office, the California Community Choice Association and Sierra Club,* A.24-11-007 (May 7, 2026) (Joint Motion for Partial Settlement).

10 Joint Motion for Partial Settlement, at 16-17.

11 *Id.*, at 15

12 *Id.*, at 8.

13 *Id.*, at 14.

- PG&E will report quarterly on interconnection requests and annually on customers energized under Rule 30.[14] These reports will be shared with impacted CCAs.
- CalCCA and PG&E will adhere to the proposed coordination of service requirements including timelines for customers to be considered enrolled and notice requirements for any customer's intent to switch generation service providers.[15]

CalCCA reiterates the request in the Joint Motion for Partial Settlement that the Commission adopt these jointly supported positions in any final decision in this proceeding. To the extent that the Commission declines to adopt the Partial Settlement, CalCCA urges the Commission to adopt the position laid out in the CalCCA Opening Brief.

While PG&E and CalCCA were able to reach a negotiated Settlement on most of the information sharing issues in this proceeding, the parties were not able to settle PG&E's request that the Commission require CCAs to complete cybersecurity and privacy reviews. CalCCA's Opening Brief in this proceeding lays out, in detail, why PG&E's requests should be rejected.[16] CalCCA therefore recommends that the Commission:

- Reject PG&E's proposed Privacy Risk Assessment (PRA) and Third-Party Cyber-Security Review (TSR) requirements as unnecessary given the CCA role as default generation provider.

Throughout this proceeding, PG&E presented only limited evidence to demonstrate that its proposed PRA and TSR conditions are just and reasonable and therefore has not met its burden of proof.

II. BACKGROUND

A. Factual Background

CalCCA has no additional comments.

---

[14] *Id.*, at 14-15.
[15] *Id.*, at 16-17.
[16] *See California Community Choice Association's Opening Brief,* A.24-11-007 (Oct. 24, 2025) (CalCCA Opening Brief).

B. Procedural Background

CalCCA has no additional comments.

C. Policy Issues: Standard of Review

The Opening Briefs of The Utility Reform Network (TURN) and The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) both highlight that PG&E bears the burden of proof. TURN states: "Th[e] evidentiary burden is entirely PG&E's. Other parties do not have the burden of proving the unreasonableness of the PG&E's proposal."[17] Cal Advocates similarly states: "As the applicant in this proceeding, PG&E bears the burden of proof to affirmatively show that its requests are necessary, just, and reasonable."[18] CalCCA agrees that PG&E bears the burden of demonstrating that its proposed cyber-security and privacy requirements are just and reasonable. Unless and until PG&E has met its burden, the Commission cannot adopt PG&E's proposals in this proceeding.

III. DISCUSSION

A. Issue 1 – Reasonableness: Are the provisions of Electric Rule 30 just and reasonable for the new transmission level customers and the existing ratepayers?

CalCCA takes no position on Issue 1 or its subparts.

1. Issue 1.a: Is the current process for customers requesting electric service at transmission voltages efficient and adequate?

B. Issue 2 – Jurisdiction, Statutes, and Decisions: Does Electric Rule 30 align with existing laws, regulations, or other Commission decisions?

CalCCA takes no position on Issue 2 or its subparts.

---

17 *Opening Brief of The Utility Reform Network* (TURN Opening Brief), A.24-11-007 (Oct. 24, 2025), at 5.

18 *Public Advocates Office Opening Brief* (Cal Advocates Opening Brief), A.24-11-007 (Oct. 24, 2025), at 6.

1. **Issue 2.a: How should the Commission determine what parts of PG&E's Rule 30 proposal are within the CPUC or FERC's jurisdiction?**

2. **Issue 2.b: Is Section 783 applicable to Electric Rule 30?**

C. Issue 3 - Rates, Cost Causation, and Allocation: For each of the four electrical facility types to interconnect customers at the transmission level – Facility Type 1: Transmission Service Facilities, Facility Type 2: Transmission Interconnection Upgrades, Facility Type 3: Transmission Interconnection Network Upgrades, and Facility Type 4: Transmission Network Upgrades –

CalCCA takes no position on Issue 3 or its subparts.

1. **Issue 3.a: How should the Commission determine cost causation to ensure that beneficiaries pay for Facility Types 1-4?**

2. **Issue 3.b: Is there a jurisdictional split between FERC and CPUC costs for these transmission-level load interconnections for Facility Types 1-4? If so, what is the split?**

3. **Issue 3.c: How should PG&E account for and recover costs accrued under CPUC jurisdictional rates and those under FERC jurisdictional rates?**

4. **Issue 3.d: How should the Commission allocate the cost of new transmission-level infrastructure between existing ratepayers and the transmission-level applicant to ensure the allocation of costs is commensurate with the benefits of the facilities for ratepayers and the applicant?**

5. **Issue 3.e: How will the load from new transmission-level customers affect electric service and reliability, electric utility revenue requirement, and electric rates for existing customers?**

6. **Issue 3.f: Are the proposed refund provisions of customer Advances, Actual Cost Payments, and reimbursement for Contributions and costs associated with Applicant Build Facilities over a 10-year period reasonable? If so, why? If not, what alternative should the Commission consider?**

7. **Issue 3.g: Is PG&E's Base Annual Refund Process (BARC) a reasonable methodology to determine when applicants are eligible for refunds?**

8. **Issue 3.h: What is the process and timeline for adding costs, including refunds for new facilities to the ratebase (for all impacted jurisdictions)?**

9. **Issue 3.i: Is it reasonable for PG&E to provide outstanding refunds to subsequent customers prior to or during the refund period based on the use of Transmission Interconnection Upgrades (Facility Type 2) and/or Transmission Interconnection Network Upgrades (Facility Type 3)?**

10. **Issue 3.j: Is PG&E's proposal to enter into a pre-funding loan to build Transmission Network Upgrades reasonable? How will this impact ratemaking?**

11. **Issue 3.k: Does Rule 30 sufficiently protect ratepayers from financial risk from stranded costs and/or make ratepayers whole for any shortfall between the projected and actual revenue and load from Rule 30 customers over the 10-year reimbursement period? If not, what additional rules should the Commission adopt?**

D. ISSUE 4: Reporting

1. **Issue 4.a: Should the Commission establish reporting requirements for these Transmission level projects in this proceeding to inform related electric system planning processes? For example, reporting of projected load from Rule 30 customers could help to inform load forecasting.**

CalCCA has no additional comments on issue 4.a.

2. **Issue 4.b: What information sharing requirements should PG&E adopt to ensure that the CCAs affected by Rule 30 related load growth can meet projected demand in their service areas?**

As outlined in the Joint Motion for Adoption of Partial Settlement and noted above, CalCCA and PG&E are substantially in agreement on the principles to guide information sharing and coordination of service regarding new large load customers. CalCCA reiterates the request that the Commission adopt the Partial Settlement outlined in the Joint Motion.

The only CalCCA issue not settled and subject to ongoing litigation in this proceeding is PG&E's proposed requirement that CCA's receiving transmission interconnection applications and related information be required to participate in a PG&E-developed TSR and a PRA.[19] CalCCA's Opening Brief outlines, in detail, the justifications for rejecting the PG&E proposals outright. The Commission should reject this proposal as:

- CCAs are government entities and should not be subject to vendor-like oversight;[20]
- The voluntary actions of some CCAs is not evidence that the PRA and TSR are reasonable requirements;[21] and
- Contrary to commission precedent, the imposition of the PRA or TSR requirements could delay CCA access to its own customer information.[22]

CalCCA's governing principle of this proceeding is: ***when PG&E receives information on a new large load, the default provider CCA should also receive that information consistent with confidentiality requirements, to enable the CCA to work with the customer and maximize the potential for efficient procurement—there is no justification for delay***.[23] PG&E's proposed TSR and PRA requirements would undermine the efficient coordination between the IOU and the CCAs.

PG&E's Opening Brief provides only limited arguments in support of its proposed reviews. In addition to the arguments laid out in CalCCA's Opening Brief, CalCCA highlights that PG&E has not provided any evidence to demonstrate that CCAs represent a privacy or cybersecurity threat, or which justifies granting PG&E a "gatekeeper" role over information necessary for the CCA to fulfill its role as default generation provider. While the PG&E Opening Brief devotes only limited space to its proposed TSR and PRA, to the extent that PG&E makes any novel arguments supporting its proposals in its Reply Brief, CalCCA reserves the right to request an opportunity for sur-reply.

---

19 PG&E Opening Brief, at 95.
20 CalCCA Opening Brief, at 23-24.
21 *Id.*, at 24-15.
22 *Id.*, at 25-26.
23 Exh. CalCCA-01 at 5, lines 1-4; Exh. CalCCA-02, at 2, lines 21-24.

E. ISSUE 5: Accounting and operational reporting process:

CalCCA takes no position on Issue 5 or its subparts.

1. **Issue 5.a: What accounting and operational reporting requirements are needed to implement Electric Rule 30?**

2. **Issue 5.b: Should PG&E's request to establish a memorandum account to track interest payments for Commission-jurisdictional facilities under Electric Rule 30 be approved?**

3. **Issue 5.c: When seeking to recover amounts in the memorandum account, what accounting requirements should PG&E demonstrate, including (1) paying the appropriate interest rate, (2) paying interest on amounts refunded to the transmission-level customer for facilities included in Commission-jurisdictional rates, and (3) appropriately calculating the interest amount?**

4. **Issue 5.d: Should the requirements of the Commission's Standard Practice U-27-W be required?**

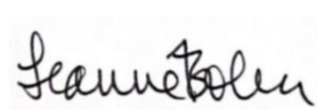
F. Issue 6 – Implementation: Should PG&E be directed to file a Tier 1 AL after a Commission decision is issued in this proceeding directing PG&E to file a revised Electric Rule 30 and form agreements within forty-five (45) days of a final decision?

CalCCA takes no position on Issue 6.

IV. CONCLUSION

CalCCA appreciates the opportunity to submit this Reply Brief and requests the adoption of the positions proposed herein.

Respectfully submitted,



Leanne Bober,
Director of Regulatory Affairs and Deputy General Counsel
CALIFORNIA COMMUNITY CHOICE ASSOCIATION

May 22, 2026