

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



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Order Instituting Rulemaking to Enhance
Demand Response in California.

Rulemaking 25-09-004

**REPLY COMMENTS OF OLIVINE, INC. ON ENERGY DIVISION STAFF'S
MARCH 10 AND APRIL 8, 2026 PROPOSALS ON BRIDGE YEAR FUNDING
AND SUPPLEMENTAL QUESTIONS**

Filed May 21, 2026

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I. INTRODUCTION AND SUMMARY

Olivine, Inc. (Olivine) respectfully submits these reply comments in response to the opening comments filed April 30, 2026 on the Energy Division's March 10, 2026 Staff Proposal on IOU Bridge Year Funding and the April 8, 2026 Supplemental Ruling concerning the Emergency Load Reduction Program (ELRP). Olivine appreciates the substantive engagement of parties across the spectrum, including the investor-owned utilities (IOUs), third-party demand response (DR) providers, original equipment manufacturers (OEMs) and technology providers, consumer advocates, and trade associations. These reply comments are intended to address the principal points of agreement and disagreement that emerged in those filings.

As a threshold matter, Olivine reiterates the disclosure made in its opening comments. Olivine currently administers ELRP on behalf of all three IOUs and the Demand Side Grid Support (DSGS) program on behalf of the California Energy Commission (CEC), and separately operates its own third-party virtual power plant (VPP) portfolio. That operational vantage point informs Olivine's recommendations but does not motivate them. The positions advanced herein are grounded in what Olivine believes serves California ratepayers, the integrity of demand-side resources as a reliability and decarbonization pathway, and the State's energy and environmental goals.

These reply comments focus on the accountability and procedural questions raised in opening comments. Olivine offers practical accountability measures intended to support the Commission's consideration of the concerns raised by the Public Advocates Office (Cal Advocates), The Utility Reform Network (TURN), and the Utility Consumers' Action Network (UCAN) alongside the operational continuity and grid reliability functions the bridge mechanism is designed to serve. On the broader structural questions raised in opening comments, Olivine joins the substantial record developed by other parties without restating their positions in detail. These reply comments organize Olivine's response around four propositions:

1. Ratepayer protection and operational continuity can be advanced together through a coordinated package of targeted measures: a fixed sunset of the pilot designation for extended pilots at December 31, 2029; transition to standard cost-effectiveness review beginning with the 2030–2034 cycle; transparent program-element-level performance reporting during the bridge years; informational application of the Societal Cost Test (SCT) using existing, underspent Evaluation, Measurement, and Verification (EM&V) budgets, as TURN suggests; and targeted operational review of pilot-related Marketing, Education, and Outreach (ME&O) of the kind Cal Advocates proposes. Each measure addresses an accountability concern raised in opening comments.
2. Olivine reaffirms specific procedural positions taken in its opening comments: an exemption from the SCT requirement for bridge-year portfolios; an extension of the 2030–2034 application deadline along the lines proposed by the IOUs in opening comments, with particular consideration of Southern California Edison Company's (SCE) approach of tying the deadline to a specified period after the Commission's

substantive policy decisions in this rulemaking; and parity with 2027 approved budget levels.

3. Procedural efficiency matters. The factual record assembled through opening and reply comments, supplemented by focused workshops at the Administrative Law Judge's direction, is sufficient to support a Commission decision in Q3 2026. Procedural delays would compound the very risks to customer continuity, grid reliability, and program data integrity that the bridge mechanism is intended to address. Olivine also supports Tier 1 and Tier 2 advice letter authority of the kind proposed by Southern California Edison Company (SCE) and PG&E to manage incremental refinements efficiently during the bridge years.
4. On the question of whether bridge funding should include pilot funding and whether the bridge period should be used productively to inform the 2030–2034 cycle, the record reflects substantial party consensus. Olivine joins that consensus rather than relitigating arguments that other parties have already developed. Olivine's additional views on structuring bridge-period work are discussed in Section V.

The remainder of these comments develops these propositions in order. Section II sets forth Olivine's responses to the accountability concerns raised by ratepayer advocates and is the analytical center of these reply comments. Section III addresses specific procedural and policy issues. Section IV addresses procedural efficiency and bridge-year governance. Section V briefly joins the broad record on inclusion of pilot funding and on use of the bridge period as a forward-looking opportunity. The Conclusion summarizes Olivine's recommendations.

II. ENGAGING CONSTRUCTIVELY WITH CONCERNS ABOUT PILOT MATURITY, COST-EFFECTIVENESS, AND PROGRAM UNDERSPENDING

Opening comments raise legitimate concerns about pilot maturity, cost-effectiveness, and program underspending. ELRP has been in operation since 2021, and by the end of the bridge period it will have run for approximately nine program years without any comprehensive cost-effectiveness review. Though mid-cycle spending levels may warrant some degree of scrutiny, the initial intent of these pilots was not cost-effectiveness, but emergency load reductions with an opportunity for all types of resources to participate. With that said, pilot exemptions from cost-effectiveness review should not be indefinite. These observations from Cal Advocates, TURN, and UCAN identify issues the Commission could choose to address in the bridge year decision.

Cal Advocates, TURN, and UCAN each raise ratepayer-protection concerns warranting substantive engagement in this proceeding. Olivine shares the underlying ratepayer-protection objectives those parties advance. Where Olivine arrives at different conclusions on specific questions in the subsections that follow, those differences are differences over implementation, not over the objectives themselves.

A. A clear sunset of the pilot designation for extended pilots addresses the indefinite-pilot concern

UCAN's position that the pilot exemption from cost-effectiveness review should end with the bridge years has substantial merit. So does Cal Advocates' concern about an open-ended pilot status that could be perpetuated through successive extensions. Olivine's opening comments recommended a December 31, 2029 sunset of ELRP's pilot designation, coinciding with the start of the 2030–2034 cycle, and Olivine reaffirms that recommendation here as the most direct structural answer to those concerns.

The same logic extends to other pilot programs continued through the bridge years. Each pilot approved or extended in Decisions (D.) 23-12-005 and D.24-12-029 should similarly transition out of pilot status at the close of the bridge period, with continued operation addressed through standard portfolio review in the 2030–2034 application proceeding. Applying the indefinite-pilot remedy consistently across the portfolio is more responsive to the concerns UCAN and Cal Advocates raise than singling out any individual pilot.

A fixed calendar sunset addresses the indefinite-pilot concern directly and durably. It establishes that any continued role for these pilot resources must be addressed in the 2030–2034 application proceeding through standard portfolio review, rather than through extension of pilot status. Olivine notes that several parties, including SCE, Leapfrog Power, Inc. (Leap), the California Solar & Storage Association (CALSSA), and San Diego Gas & Electric Company (SDG&E), have proposed an event-based sunset (i.e., ELRP continues until a successor program is operational) rather than a fixed calendar date. Olivine does not oppose that alternative in principle but views a fixed calendar sunset, paired with explicit Commission direction that successor program design be addressed in the 2030–2034 application proceeding, as providing clearer accountability and as more directly responsive to the concerns raised by UCAN and Cal Advocates. A fixed calendar sunset additionally provides a degree of market certainty for customers, aggregators, and the IOUs alike in planning for the 2030–2034 transition.

B. Standard cost-effectiveness review should begin with the 2030–2034 cycle

UCAN’s recommendation that ELRP and other extended pilots be subject to standard cost-effectiveness review is constructive and Olivine supports it in substance. Olivine respectfully proposes a modest refinement of the timing: that standard cost-effectiveness review apply to ELRP and other previously-pilot resources beginning with the 2030–2034 cycle, with the bridge period

itself used to develop the methodologies, baselines, and data infrastructure that credible review will require.

The reasoning for this refinement is methodological rather than substantive. The SCT calculation tool referenced in the Staff Proposal does not yet exist. The cost-effectiveness methodologies necessary to evaluate diverse resource types operating under modernized program structures, including behind-the-meter battery aggregations, vehicle-grid integration, and net-export capability, are themselves the subject of active development in this rulemaking and in coordination with the CEC and the California Independent System Operator (CAISO). Imposing full cost-effectiveness review at the start of the bridge years, before that methodological work has been completed, risks producing review outcomes that reflect methodological gaps rather than program performance. Imposing review at the start of the 2030–2034 cycle, with the methodological foundations developed during the bridge, addresses Cal Advocates’ and UCAN’s substantive concerns in a more durable manner and produces review results in which the Commission and stakeholders can have justified confidence.

C. Informational SCT analysis funded from existing EM&V budgets has merit

Olivine’s opening comments did not address Question 4.1.f directly. On reply, Olivine notes that TURN’s proposal to perform SCT analyses using existing, underspent EM&V budgets on an informational (not gating) basis represents a reasonable middle ground between the formal SCT exemption supported by the IOUs and the California Efficiency + Demand Management Council, and full SCT compliance for bridge-year portfolios.

Olivine accordingly takes the following position. Olivine supports an exemption from the SCT requirement for bridge-year portfolios, consistent with the position of all three IOUs and the Council, for the methodological reasons set forth in Subsection B above and in Section III.A below.

At the same time, Olivine does not oppose informational SCT analysis funded by existing EM&V budgets, as TURN suggests as long as this effort is scoped and managed appropriately. Such analysis could generate methodological learning useful for the 2030–2034 cycle and address the legitimate concern that bridge portfolios proceed without any SCT engagement, with associated administrative cost contained within existing EM&V authorizations to the extent feasible. UCAN’s related recommendation of joint shared-vendor procurement for SCT integration work, to maximize cost-efficiency and methodological consistency across the IOUs, is sensible, and Olivine supports the Commission’s consideration of that procurement approach.

D. Transparent program-element-level reporting during the bridge years

The Small Business Utility Advocates (SBUA), Advanced Energy United (AEU), UCAN, and other parties have raised a concern that bridge-period operations should be accompanied by transparent and standardized performance reporting. Olivine does not object to the Commission’s direction that each IOU file standardized, publicly available performance metrics during these bridge years. These metrics, specifically cost per kW reduced, participation rates, performance during dispatch events, and program element-level cost data, are largely already collected for internal management purposes. Consequently, the incremental budgetary impact of such reporting is expected to be minimal.

E. Targeted, evidence-based review of pilot-related ME&O

Cal Advocates’ specific recommendation that pilot-related ME&O be identified and reviewed for appropriateness, including a Tier 2 advice letter from PG&E itemizing the portion of its Category 6 ME&O budget supporting ELRP during the 2024–2027 cycle, raises an accountability question to which Olivine respectfully responds with a refinement rather than rejection.

Olivine respectfully does not support a categorical exclusion of pilot-related ME&O from the bridge as the principal mechanism, because such an exclusion would, as a practical matter, undermine customer outreach for the very programs the Commission would otherwise be extending. ME&O is not an ancillary expense; it is the operational mechanism by which programs reach the customers whose participation produces load reduction. A categorical exclusion adopted before targeted review would foreseeably reduce enrollment and degrade the quality of the operational data the bridge years are intended to develop, including the cost-effectiveness data that Cal Advocates' own concerns presuppose.

Olivine does, however, support the underlying objective that pilot-related ME&O spending be transparent and subject to operational review. Specifically, Olivine is not opposed to Cal Advocates' proposal that PG&E file a Tier 2 advice letter identifying and quantifying the portion of its Category 6 ME&O budget supporting ELRP during the 2024–2027 cycle, and does not oppose comparable transparency from the other IOUs. Targeted itemization and review rather than categorical exclusion in advance of evidence, addresses Cal Advocates' concern with the operational specificity that any subsequent calibration of ME&O spending will require.

F. Administrative cost scrutiny grounded in operational evidence

TURN's opening comments cite mid-cycle spending data (PG&E at 19.7%, SDG&E at 17.8%, and SCE at 36% of authorized totals, with ELRP administrative spending identified as a significant driver of underspending) in support of a recommendation to reduce ELRP program administration funding during the bridge years. Olivine takes TURN's underspending observation seriously and agrees that material underspending warrants review. Olivine respectfully suggests, however, that the appropriate forum for that review is the standard portfolio review in the 2030–

2034 application proceeding, rather than mid-bridge administrative reductions imposed on the basis of mid-cycle spending percentages alone.

Mid-cycle spending percentages are informative but not, in themselves, complete measures of program efficiency or appropriate spending levels. Several factors affect the relationship between cumulative spending at a snapshot date and program performance: ELRP enrollment, particularly in Subgroups A.4 and A.5, has been on a ramp-up trajectory, with administrative and operational costs scaling alongside enrollment growth rather than tracking a flat annualized profile; ELRP dispatch-driven costs (incentive payments, evaluation activity, settlement) are heavily back-loaded toward summer months and toward years with significant grid stress events; certain program development costs are appropriately front-loaded, with corresponding declines in administrative intensity as programs mature; and underspending in one budget category does not necessarily indicate that the spending that did occur was excessive.

The 2030–2034 application proceeding is the appropriate forum for the administrative cost review TURN’s concern contemplates. IOUs are required to justify their proposed budgets in that proceeding, and standard portfolio review provides parties and the Commission with structured opportunities to evaluate cost-effectiveness, including the administrative cost components of demand response programs. Deferring administrative calibration to that proceeding addresses TURN’s substantive concern while avoiding mid-bridge reductions that could impair program operations during the bridge period. This is not an argument against accountability; it is an argument for accountability grounded in the standard portfolio review rather than mid-bridge reductions imposed on the basis of spending percentages in isolation.

III. SPECIFIC PROCEDURAL AND POLICY ISSUES

A. SCT exemption for bridge-year portfolios

Olivine supports an exemption from the SCT requirement for bridge-year portfolios, consistent with the position of all three IOUs and the Council. The reasoning is set forth in Section II.B above and need not be repeated here in full: applying SCT as a gating requirement during the bridge would introduce uncertainty without driving program changes, given that the SCT calculation tool does not yet exist and the supporting methodologies remain under development. Olivine reiterates, however, that its support for an SCT exemption is paired with its support for informational SCT analysis funded from existing EM&V budgets, as discussed in Section II.C, which addresses the substantive ratepayer-protection function that SCT compliance is intended to serve without imposing the methodological and administrative cost of a gating requirement during the bridge.

B. 2030–2034 application deadline

Olivine reaffirms its support for extending the 2030–2034 application deadline to allow this proceeding to conclude in a timely manner and to allow the IOUs sufficient time after the Commission’s substantive policy decisions to design portfolios that reflect those decisions.

Parties have proposed a range of alternative deadlines in opening comments. PG&E, SDG&E, and the Vehicle-Grid Integration Council (VGIC) have proposed mid-2028 deadlines (June 30 or July 1, 2028) to allow the proceeding to conclude before the end of 2029. SCE has proposed tying the deadline to a specified period after substantive policy decisions in this rulemaking, recognizing that IOU portfolio applications cannot be developed against still-unsettled policy. TURN has proposed December 15, 2028. The Staff Proposal, supported by Leap and Voltus, proposes January 1, 2029.

Each of these proposals reflects a legitimate concern about ensuring sufficient time for application development and Commission review. Olivine's principal concern is that whatever deadline the Commission adopts allow sufficient time after the Commission's substantive policy decisions for IOUs to design portfolios that reflect those decisions, rather than forcing applications to be filed against still-unsettled policy. The IOU proposals collectively are most directly responsive to that principle and merit the Commission's consideration, with SCE's event-based approach offering a particularly direct alignment between the deadline and the policy decisions that will inform the applications. Olivine supports these alternative approaches that achieve the same essential function.

C. Specific ELRP design changes proposed by IOUs

Specific calibrations to ELRP, including potential adjustments to minimum dispatch hours, dispatch trigger criteria, and incentive structures, have been proposed in opening comments. Calibration decisions of this nature are most appropriately made on the basis of the operational data available to the IOUs and the Commission, including dispatch performance, enrollment trajectories, and program-level evaluation results, rather than on the views of any individual participant in this proceeding.

One narrow point from Olivine's opening comments bears emphasis: the overall structural integrity of Subgroups A.4 and A.5 should be carefully reviewed during the bridge years. These Subgroups are providing predictable participation, predictable compensation, and demonstrated performance, and wholesale restructuring during the bridge years could risk impairing the data record that will inform the 2030–2034 cycle. However, calibration changes, whether to dispatch triggers, dispatch hour caps, or incentive levels, may still be appropriate based on the operational evidence.

Olivine also notes the proposal advanced by VGIC and Tesla to align ELRP A.5 submetering requirements with the device-level approach used in A.4 and DSGS Option 3, eliminating the requirement that A.5 submetering must comply with the California Plug-In Electric Vehicle Submetering Protocol (EVSMP) and use a registered Meter Data Management Agent (MDMA). Olivine agrees in broad principle that, where multiple compliance pathways can deliver the necessary measurement accuracy, the Commission's programs should permit the lower-burden pathway that maintains appropriate accuracy, particularly where program data is not used for utility billing.

IV. PROCEDURAL EFFICIENCY AND BRIDGE-YEAR GOVERNANCE

Olivine joins the broad consensus across opening comments, including SCE, Leap, and in its procedural posture Cal Advocates, that evidentiary hearings are not necessary for the bridge year funding issue. The factual record assembled through opening comments and reply comments, supplemented by any focused workshops the Administrative Law Judge may direct, is sufficient to support a Commission decision in Q3 2026. Procedural delay would compound the very risks to customer continuity, grid reliability, and program data integrity that the bridge year mechanism is intended to address.

Olivine also supports the bridge-year governance mechanisms proposed by SCE and PG&E, including Tier 1 advice letter authority for non-controversial program changes and Tier 2 advice letter authority for enrollment efficiency improvements and incremental program refinements. These mechanisms permit the IOUs and Commission staff to address operational refinements as they arise during the bridge years, including the targeted ME&O review discussed in Section II.E and the administrative cost accounting discussed in Section II.F, without requiring separate proceedings for each. The Commission and parties retain full participation rights in any

Tier 2 advice letter through the standard protest process, preserving accountability while supporting efficiency.

V. SUPPORTING THE BROAD RECORD ON A PURPOSEFUL BRIDGE PERIOD

Two related questions on the structure of the bridge have been substantially developed in the opening comments of other parties: whether bridge funding should include the pilot resources approved or extended in Decision (D.) 23-12-005 and D.24-12-029, and whether the bridge period should be used productively to inform the 2030–2034 cycle. Olivine offers brief views on each below and refers the Commission to those filings rather than restating arguments other parties have already advanced in detail.

A. Party consensus on inclusion of pilot funding in the bridge authorization

On the question of whether bridge funding should include pilot funding, the record reflects substantial party consensus. Apart from Cal Advocates, whose substantive concerns Olivine has addressed at length in Section II, parties addressing this question support including pilot funding in the bridge in various forms. The IOUs (with detailed proposals from PG&E, SDG&E, and SCE), every third-party aggregator that filed opening comments, every OEM and technology commenter, and the substantial majority of trade associations and consumer advocates have set out the case for inclusion in their opening comments.

The substantive considerations supporting inclusion (continuity for customers and aggregations already enrolled, preservation of dispatchable emergency capacity during a documented load-shift shortfall, preservation of prior ratepayer investment in customer enrollment and telemetry deployment, and preservation of the operational data record needed for 2030–2034 portfolio design) have been developed in detail by other parties, and Olivine’s opening comments addressed these considerations at length. SCE’s proposal to fund ELRP Subgroups A.4 and A.5

from already authorized but unspent IDSM funding and ELRP Balancing Account carryover offers a particularly attractive path that limits incremental ratepayer impact and merits the Commission's consideration alongside comparable mechanisms. The accountability measures developed in Section II are intended to complement, not substitute for, the structural choices the Commission will make in this track.

B. The bridge as a forward-looking opportunity rather than a passive extension

Olivine joins parties, including Tesla, Enchanted Rock, the Vehicle-Grid Integration Council, the California Efficiency + Demand Management Council, the California Solar & Storage Association, and Leapfrog Power, Inc., in urging that the bridge period serves as a forward-looking opportunity rather than a passive extension. Enchanted Rock's formulation of the bridge as "a policy bridge, not a policy freeze" captures the operative principle. The categories of bridge-period work that opening comments collectively identify (operational and methodological refinement, customer experience and enrollment improvements drawing on DSGS lessons where regulatorily feasible, expanded recognition of resource capability including behind-the-meter battery storage and vehicle-to-grid functionality, dispatch innovation, CAISO market integration and alignment with the CEC's Load Management Standards, and cost-effectiveness methodology development) can be advanced within existing program structures and authorized funding, with the Tier 1 and Tier 2 advice letter authority discussed in Section IV providing the appropriate procedural vehicle. Olivine refers the Commission to the opening comments of the parties cited for the detailed treatment each category warrants.

VI. CONCLUSION

Olivine appreciates the Commission's careful stewardship of this proceeding and the substantive engagement of the broad set of parties on these issues. The accountability measures

proposed in Section II are intended to support the Commission’s consideration of the ratepayer-protection concerns raised by Cal Advocates, TURN, and UCAN alongside the operational continuity, customer protection, and grid reliability functions the bridge mechanism is designed to serve. Olivine respectfully urges the Commission to:

1. Establish December 31, 2029 as a fixed sunset for the pilot designation of ELRP and other pilots approved or extended in D.23-12-005 and D.24-12-029 that are continued through the bridge years, paired with a directive that any continued role for these resources be addressed through standard portfolio review in the 2030–2034 application proceeding;
2. Direct that ELRP and other extended pilots be subject to standard cost-effectiveness review beginning with the 2030–2034 cycle, with the bridge period used to develop the supporting methodologies, baselines, and data infrastructure;
3. Direct each IOU to file standardized publicly available performance metrics during the bridge years, including program-element-level cost-effectiveness data, consistent with the principles articulated by SBUA, AEU, and UCAN;
4. Exempt bridge-year portfolios from the SCT requirement, while authorizing informational SCT analysis funded from existing EM&V budgets, with consideration of joint shared-vendor procurement to maximize cost-efficiency and methodological consistency as proposed by UCAN;
5. Adopt Cal Advocates’ proposal that PG&E file a Tier 2 advice letter identifying and quantifying the portion of its Category 6 ME&O budget supporting ELRP during the 2024–2027 cycle, with comparable transparency from the other IOUs, while declining

- to adopt a categorical exclusion of pilot-related ME&O in advance of that targeted review;
6. Defer evaluation of program administrative spending to the standard portfolio review in the 2030–2034 application proceeding, rather than imposing across-the-board administrative reductions during the bridge years on the basis of mid-cycle spending percentages alone;
 7. Authorize two years of bridge funding for PG&E, SCE, and SDG&E at parity with 2027 approved levels, including continuation of pilot funding approved or extended in D.23-12-005 and D.24-12-029, with consideration of SCE’s proposal to fund ELRP A.4 and A.5 from existing unspent IDSM funding and ELRP Balancing Account carryover where consistent with ratepayer interest;
 8. Extend the 2030–2034 application deadline along the lines proposed by the IOUs in opening comments, with particular consideration of SCE’s approach of tying the deadline to a specified period after the Commission’s substantive policy decisions in this rulemaking, or to such other date as ensures applications can reflect those decisions; and

9. Authorize Tier 1 and Tier 2 advice letter authority during the bridge years for non-controversial program changes and enrollment efficiency improvements, consistent with proposals advanced by SCE and PG&E, to manage incremental refinement work efficiently during the bridge period.

Dated: May 21, 2026

Respectfully submitted,

_____/s/_____

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