

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



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Order Instituting Rulemaking on California
Advanced Electric Rate Design.

Rulemaking 26-04-009
(Issued April 10, 2026)

**REPLY COMMENTS OF SIERRA CLUB ON ORDER INSTITUTING RULEMAKING
ON CALIFORNIA ADVANCED ELECTRIC RATE DESIGN**

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Dated: May 21, 2026

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Pursuant to the Order Instituting Rulemaking on California Advanced Electric Rate Design (“OIR”)¹ and the E-Mail Ruling Clarifying Order Instituting Rulemaking Reply Comment Deadline of May 21, 2026,² Sierra Club timely provides the following reply to the OIR’s questions for party comment.

I. INTRODUCTION

In opening comments, numerous parties noted both the breadth and complexity of scoped issues raised in the OIR and the limited time and procedural opportunities for robust record development.³ Sierra Club supports dividing the proceeding into parallel tracks with one track focused on rate design changes to support building and industrial electrification. This track would include the reexamination of baseline methodologies for residential customers, changes to time of use (“TOU”) periods and differentials, and measures to improve the economics of industrial heat pumps and other technological solutions to meet low- medium temperature process heat applications for industrial customers. A second track would focus on data center and other industrial rate issues, including the creation of rate designs specific to data center customers to reflect their unique impacts and risks. Finally, Sierra Club is significantly concerned with Bloom’s suggestion of a rate design to facilitate on-site gas generation to meet data center energy needs given the significant greenhouse gas emissions from fuel cells and the potential ratepayer impacts of related gas system capacity expansion.

¹ Order Instituting Rulemaking on California Advanced Electric Rate Design (Apr. 10, 2026), <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M604/K677/604677976.PDF>.

² E-Mail Ruling Clarifying Order Instituting Rulemaking Reply Comment Deadline of May 21, 2026, at 3 (May 14, 2026), <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M606/K596/606596790.PDF>.

³ See, e.g., TURN Opening Comments at 4–5 (“The Commission’s aim to resolve the proceeding within 24 months is highly ambitious and unrealistic given the OIR’s scope” and “the proposed schedule only specifies one workshop, which is insufficient given the number of discrete issues at play.”).

II. DISCUSSION

A. The Commission Should Prioritize Adoption of Rate Designs to Facilitate Residential and Industrial Electrification.

Rate design changes that facilitate building and industrial electrification should be a proceeding priority. As the Building Decarbonization Coalition (“BDC”) notes, “[r]egional and local appliance standards will start taking effect over the next few years, and customers installing new electric appliances will need rate options that reduce their overall costs and better reflect the marginal cost of electrification.”⁴ Accordingly, “[s]wift action to align electric rates with the state’s climate goals and appliance standards is an important strategy to help keep electric bills affordable for residential customers as they electrify.”⁵ Similarly, while California has significant potential to reduce emissions through electrification of low- and medium-temperature process heat operations, access to affordable electricity remains a significant barrier to progress. Updates to residential baseline methodologies, TOU rate design, and mechanisms to reduce the operational cost of electrification of process heat operations are urgently needed to support achievement of California’s climate objectives.

1. Updates to Residential Baseline Methodologies

Sierra Club supports the recommendation of the Public Advocates Office (“PAO”) to modify preliminary scoping issue g to state:

Should the Commission approve alternatives to baseline tiers or update baseline methodologies in time-of-use rates in order to improve customer understanding, improve vulnerable customer protections in hot climate zones, and support electrification? If so, how?⁶

As explained in Sierra Club’s Opening Comments, revisiting and revising baseline methodologies—including the methodology by which “all-electric” homes are calculated and the need for baseline adjustments for electric water heating—is a crucial step in making rate design more equitable and electrification more affordable.⁷

In addition, as The Utility Reform Network (“TURN”) observes, “[b]aseline allowances provide broad affordability protections to lower-usage customers across an entire utility service

⁴ BDC Opening Comments at 4.

⁵ *Id.*

⁶ PAO Opening Comments at 6.

⁷ See Sierra Club Opening Comments at 2–5; see also BDC Opening Comments at 4 (noting need for baseline adjustment for electric water heating).

territory” and their removal would likely have the most significant adverse bill impacts on inland customers during summer months.⁸ While the Preliminary Scoping Memo appears to suggest that alternatives to baseline tiers might “improve vulnerable customer protections in hot climate zones,”⁹ the removal of baselines could very well have the opposite effect. Baseline allowances, which provide lower cost energy to meet essential needs, remain an important equity component of California’s rates. While San Diego Gas & Electric Company suggests the State’s electrification goals merit reconsideration of baseline adjustments in default rates,¹⁰ its logic primarily applies to residential customers with higher energy demand, such as those that live in single-family homes with at-home electric vehicle charging. Baseline adjustments remain important for improving operational costs of electrification for customers with lower energy usage, such as customers living in multi-family homes or those that may have only electrified a single appliance. Electrification rates with no baseline allowance remain available for customers with higher electricity usage that have mostly or fully electrified. Updates to baseline calculations and the availability of a baseline allowance adjustment for electric water heating are better ways for the Commission to support electrification at this time because these measures help ensure cost-savings for a broader range of residential customers.

In addition, as the California Environmental Justice Alliance (“CEJA”) states, “[l]ack of transparency and accessibility of rates and bills can lower program participation by those who could most benefit from them, which can in turn result in higher bills.”¹¹ As the Commission evaluates potential revisions to rate design, it should also consider how best to communicate and explain rate design options, eligibility, and enrollment in electric space and water heating baseline adjustments.

2. Updates to Residential TOU Periods and Differentials

Sierra Club agrees with parties including the Solar Energy Industries Association (“SEIA”) that “the design of TOU rates [should] be revisited to ensure that they are serving their intended purpose – to send accurate price signals to support economically efficient decision

⁸ TURN Opening Comments at 7–8.

⁹ OIR at 12.

¹⁰ See SDG&E Opening Comments at 7.

¹¹ CEJA Opening Comments at 4.

making by customers for consumption and investments in electrification.”¹² As SEIA notes, it has been “over ten years since the Commission addressed TOU rate design in a rulemaking proceeding.”¹³ Aligning outdated TOU periods to encourage customers to shift their usage to the middle of the day when grid emissions are significantly lower than other hours is urgently needed.

3. Rate Reforms to Enable Industrial Electrification.

Multiple parties noted the need to improve rate designs for industrial customers to enable cost-effective decarbonization. As the California Large Energy Consumers Association (“CLECA”) observes, current rate structures “do not provide accurate signals to encourage beneficial electrification.”¹⁴ Modernizing these signals is crucial because industrial decarbonization depends on “electricity rates that . . . make electrification economically viable relative to fossil fuel alternatives.”¹⁵ Likewise, Natural Resources Defense Council (“NRDC”) notes that demand charges and high electricity rates combine to create unfavorable operating economics for industrial customers considering a transition from a fossil gas boiler to highly efficient heat pump.¹⁶

These parties agree that revisiting cost recovery through non-coincident demand charges would improve industrial rate structures. CLECA agrees with Sierra Club that the Commission should consider updating its approach to demand charges to improve price signals for industrial customers, noting that “[t]ime-differentiated demand charges may provide more accurate price signals by better aligning customer costs with system conditions.”¹⁷ NRDC describes how non-coincident demand charges can discourage customers from running heat pumps or charging thermal batteries when renewables are cheap and abundant, even though this behavior “could increase grid efficiency and utilization, potentially lowering costs for other customers.”¹⁸

¹² SEIA Opening Comments at 5. *See also* Opening Comments of Center for Biological Diversity, Grid Alternatives and Vote Solar at 3–4 (noting that the current TOU rates’ price signals are too narrow to prompt customers to make cost-efficient decisions about when to use electricity, and emphasizing the importance of designing rates that support electrification).

¹³ SEIA Opening Comments at 5.

¹⁴ CLECA Opening Comments at 8.

¹⁵ *Id.*

¹⁶ NRDC Opening Comments at 11–12.

¹⁷ CLECA Opening Comments at 9.

¹⁸ NRDC Opening Comments at 11–12.

Reforms to industrial rate design are essential for achieving air quality and public health policies, in addition to California’s climate goals. California’s most populous and most polluted regions cannot achieve health-based air quality standards without a widespread transition to zero-emission equipment for stationary pollution sources, such as gas-fired industrial boilers.¹⁹ The cost of operating electric industrial equipment is a major impediment to adopting air quality regulations to achieve this transition. A recent South Coast Air Quality Management District staff analysis found that Southern California Edison’s electricity rates are 5–10 times higher than natural gas rates and that customers that transition from gas boilers to zero-emission electric equipment—even highly efficient heat pumps—would pay a significant premium for energy costs.²⁰ The Commission should prioritize rate designs that give industrial customers transitioning to zero-emissions equipment an opportunity to reduce their electricity bills by using the grid efficiently and adding load when clean energy is plentiful.

PG&E and SDG&E are wrong to suggest that investigating rate design policies to support industrial electrification would be inconsistent with the Commission’s rate design principles. PG&E and SDG&E note that one of the Commission’s recently adopted rate design principles is: “Rate design should not be technology-specific and should avoid creating unintended cost-shifts.”²¹ This principle does not require the Commission to disregard the urgency of market transformation among end-uses, as the Commission specifically crafted its wording to avoid any implication that it disfavors rates that support building electrification.²² Instead, this principle counsels that the Commission should not give a market advantage to a specific technology.²³ In

¹⁹ See South Coast Air Quality Management District (“SCAQMD”), *2022 Air Quality Management Plan*, Executive Summary, at ES-4–7 (Dec. 2, 2022), <https://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan>.

²⁰ SCAQMD Staff, Proposed Amended Rules 1146 & 1146.1 Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters, Working Group Meeting #3 Presentation, at slides 18, 38 (Feb. 13, 2026), https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/par-1146-1146.1/par-1146_wgm-3-presentation.pdf?sfvrsn=2bc6697e_2.

²¹ SDG&E Opening Comments at 8 (quoting D.23-04-040, *Decision Adopting Electric Rate Design Principles and Demand Flexibility Design Principles*, at 21 (May 3, 2023) (“D.23-04-040”), <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M507/K837/507837776.PDF>); PG&E Opening Comments at 17 (same).

²² See D.23-04-040 at 21.

²³ See *id.*

the context of industrial electrification, this means that the Commission should not pick winners among the various zero-emission technologies that can produce industrial heat.²⁴

To apply the rate design principles in the context of industrial electrification, the Commission must also consider the principle that explicitly promotes cost-effective strategies for achieving climate goals through electrification. That is, one of the principles provides: “Rates should encourage economically efficient (i) use of energy, (ii) reduction of GHG emissions, and (iii) electrification.”²⁵ Thus, prioritizing rates for efficient industrial electrification will advance the Commission’s rate design principles.

Improving rate design for industrial electrification is a key policy issue that is not currently being considered in any statewide proceeding. The Commission closed R.22-07-005 (Advanced Demand Flexibility Rulemaking) without resolving issues related to demand flexibility rates for industrial heat process producers.²⁶ In D.25-08-049, the Commission created a process for Staff to assess how these customers can use more dynamic rates so that the Commission may consider Staff recommendations in a future proceeding.²⁷ This proceeding is the most logical place to continue that work, which may otherwise be subject to a limitless delay.

B. Data Center and Large Load Track

1. The Commission Should Establish Rate Tariffs Specific to Data Centers.

As TURN notes, the “unprecedented scale, concentration, and uncertainty of data-center load requires a comprehensive and forward-looking approach to rate design and cost allocation that cannot be addressed solely through piecemeal interconnection rules or transmission-only rate impact analysis.”²⁸ In Opening Comments, numerous parties agreed with Sierra Club on the need to address the significant risks and challenges of new data center load and creation of a

²⁴ Examples of such technologies include heat pumps, induction heaters, mechanical vapor recompression, electric boilers, and turbo heaters. McKinsey, *Tackling heat electrification to decarbonize industry* (Dec. 2, 2024), <https://www.mckinsey.com/industries/industrials/our-insights/tackling-heat-electrification-to-decarbonize-industry>.

²⁵ D.23-04-040, Attach. A at 2.

²⁶ D.25-08-049, *Decision Adopting Guidelines for Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company on Demand Flexibility Rate Design Proposals*, at 13 (Aug. 29, 2025), <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M578/K182/578182496.PDF>.

²⁷ *Id.* at 13–14.

²⁸ TURN Opening Comments at 2.

separate rate class for these customers.²⁹ Establishing rates applicable to data centers using existing rate design principles should be a proceeding priority.

First, there is an urgent need for the Commission to address data center rate design issues in a timely and discrete manner. Multiple parties have recognized that the pace and scale of proposed data center development create immediate implications for utility planning, cost allocation, and infrastructure investment. TURN notes that Pacific Gas and Electric Company (“PG&E”) alone reported 43 new transmission-level interconnection requests totaling more than 10,000 MW between 2023 and 2025, with data centers accounting for the overwhelming majority of proposed load growth.³⁰ Static cost allocations based on existing customer loads may therefore quickly become inequitable if data center expansion continues at projected levels. Likewise, CLECA emphasizes both the statutory deadline imposed by SB 57 requiring the Commission to assess data center cost impacts by January 1, 2027, and the immediate need to develop rate frameworks for large new loads already seeking interconnection.³¹ Fervo Energy similarly explains that uncertainty regarding data center rate design has significant implications for near-term investment and contracting decisions and urges the Commission to address these issues in an early, discrete phase rather than allowing them to be delayed within broader residential rate reform discussions.³² Advanced Energy United likewise supports placing data center and large-load rate design issues in an early phase or separate track because of the clear statutory and policy urgency surrounding these issues.³³ These comments indicate the need for urgent action by the Commission to address the arrival of unprecedented data center-driven load growth in California.

Second, establishing a data center rate class would advance cost-causation-based ratemaking and would not constitute unlawful discrimination under California law, because Public Utilities Code § 453 prohibits only *unreasonable* differences in rates—not all distinctions

²⁹ See Sierra Club Opening Comments at 9–10; NRDC Opening Comments at 7; TURN Opening Comments at 10–11 (separate customer class would “allow for more precise cost allocation and mitigate cost shifting if a data center influx rapidly spikes systemwide energy costs.”); CBD/Grid Alternatives/Vote Solar Opening Comments at 5–6; SEIA Opening Comments at 4; SCE Opening Comments at 3–4.

³⁰ TURN Opening Comments at 2.

³¹ CLECA Opening Comments at 7.

³² Fervo Energy Opening Comments at 2.

³³ Advanced Energy United Opening Comments at 8.

among customer classes.³⁴ California law has long recognized that the Commission may assign different cost responsibility where supported by a reasonable basis, including cost causation, system impacts, equity, reliability concerns, or other policy considerations.³⁵ In this case, data centers can impose distinct operational and financial risks that justify separate treatment.³⁶ As the Data Center Coalition (“DCC”) acknowledges, customer classifications may appropriately reflect factors such as load size, infrastructure requirements, contribution to system peak, and stranded investment risk.³⁷ Data center interconnections can create unique localized reliability needs, deliverability constraints, and grid upgrades that might not otherwise be required at the same time, scale, or location. A data center-specific tariff therefore would represent a reasonable effort to align cost responsibility with the unique risks and system impacts associated with this emerging category of large load customers, rather than impermissible discrimination based solely on industry label.

Third, the Commission should address data center loads using its existing rate design principles rather than creating new or special ratemaking standards applicable only to data centers as appears to be suggested by DCC.³⁸ The Commission’s 2023 rate design decision

³⁴ Cal. Pub. Util. Code § 453.

³⁵ See, e.g., *Durant v. City of Beverly Hills*, 39 Cal.App. 2d 133, 139 (1940) (stating that “a utility may, without being guilty of unlawful discrimination, classify its customers or patrons upon any reasonable basis, as according to the purpose for which they receive the utility’s service or product, or the quantity or amount received, and, subject to the general requirements of reasonableness, make separate rates for each class or group.”); *California Manufacturers Assn. v. Pub. Utils. Comm’n*, 24 Cal.3d 251, 260 (1979) (where the Commission was permitted to consider prospective shortages of natural gas in setting different rates for different classes of customers); *United States Steel Corp. v. Pub. Utils. Comm’n*, 29 Cal.3d 603, 613 (1981) (stating that the Commission has “wide discretion to prescribe rate classifications that reflect a varied range of economic classifications”); R.12-06-013 (considering cost-causation and other public policy considerations in implementing residential rate reform); D.17-01-006, *Decision Adopting Policy Guidelines to Assess Time Periods for Future Time-Of-Use Rates and Energy Resource Contract Payments*, at 8 (Jan. 23, 2017), <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M172/K782/172782737.PDF> (stating, as an example, that time-of-use rates should tailor rate design based on different customer profiles and needs).

³⁶ See, e.g., Pub. Utils. Comm’n of Ohio, Case No. 24-508-EL-ATA, Opinion and Order, at 13 (July 9, 2025), <https://dis.puc.state.oh.us/ViewImage.aspx?CMID=A1001001A25G09B43531I00509> (where the utility had presented evidence that data centers are distinguished from commercial or industrial businesses because they require a high level of demand, operating throughout the day with no natural cycling, and often have load factors that exceed 95%); *id.* at 78 (the utility’s testimony stating that “unlike non-data center load, which comprises a diverse group of customer end uses, data center load cannot be naturally hedged by other industries in [the utility’s] service territory,” thereby presenting unique financial risks).

³⁷ DCC Opening Comments at 13.

³⁸ See *id.* at 11–12.

already provides an appropriate framework.³⁹ Of the current principles of electric rate design outlined in that decision, principle (c) requires that rates reflect cost causation, meaning customers should bear the costs they impose on the system, including infrastructure upgrades needed to serve their load.⁴⁰ Principle (h) further provides that rates should avoid unjustified cross-subsidies that undermine affordability and equity goals.⁴¹ Applying those principles here supports a data center-specific tariff because large data center projects can create distinct transmission, reliability, and stranded-cost risks that are not presented by other customers to the same degree.⁴² Principle (i) states that rates should not be “technology-specific,”⁴³ but that principle is intended to prevent the Commission from conferring unjustified competitive advantages on particular technologies or creating unnecessary cross-subsidies⁴⁴—not to prevent the Commission from accounting for measurable differences in cost causation and system risk. Accordingly, DCC’s proposed principle against “end use discrimination”⁴⁵ risks being interpreted to prohibit the Commission from recognizing the real-world system impacts associated with certain categories of load. The Commission therefore should rely on objective characteristics based on existing principles of rate design when designing a data center tariff grounded in longstanding cost-causation and affordability principles.

2. Any Consideration of Rates for Data Centers Using On-Site Power Should Include Assessment of Climate Impacts and Any Costs to Connect to the Gas System.

In its Opening Comments, Bloom characterizes its fuel cells as “supporting the State’s climate goals” and requests consideration of whether “new rate tariffs [are] needed for data center customers and/or other large-load customers to allow onsite power.”⁴⁶ Any exploration of this issue should include an evaluation of the greenhouse gas emissions of the proposed on-site power, its consistency with California’s climate objectives—and where connected to the gas

³⁹ See D.23-04-040, *Decision Adopting Electric Rate Design Principles and Demand Flexibility Design Principles*, at 36 (May 3, 2023) (“D.23-04-040”), <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M507/K837/507837776.PDF>.

⁴⁰ *Id.*

⁴¹ *Id.*

⁴² See *supra* PUC of Ohio Opinion and Order at 77–78.

⁴³ D.23-04-040 at 36.

⁴⁴ See *id.* at 20–21.

⁴⁵ DCC Opening Comments at 12.

⁴⁶ Bloom Opening Comments at 2–3.

system—provisions to ensure the costs of any gas system upgrades necessary to serve the facility are not borne by other gas ratepayers.

Methane-powered fuel cells generate significant greenhouse gas pollution that far exceeds the average emissions from California’s increasingly decarbonized grid. For example, Bloom’s technical specifications for its fuel cells state their CO₂ emissions are between 679–833 lbs/MWh.⁴⁷ In contrast California’s average grid emissions in 2024 were 407 lbs/MWh.⁴⁸ Accordingly, deployment of fuel cells to meet data center energy needs would have profound consequences for achievement of California’s climate objectives. Indeed, a data center facility in New Mexico is proposing to be supplied by 2.45 GW of fuel cells for in-site generation.⁴⁹ Deployment of this magnitude is the equivalent of putting multiple baseload gas plants back onto California’s energy system at a time when the Commission should be retiring existing gas generation to meet California’s air quality and climate objectives.

Moreover, Bloom’s technical specifications do not appear to assume increased emissions from fuel cell degradation. The Commission had required performance data on fuel cell emissions to better inform Commission policy as part of its Fuel Cell Net Metering Decision implementing greenhouse gas emission standards for fuel cells seeking net metering compensation.⁵⁰ However, the Commission subsequently stayed implementation and with it, any insight into the actual greenhouse gas emissions from these facilities and increases in their climate pollution as they degrade.⁵¹

In addition, while much of the focus on addressing the impacts of increased data center load has been on costs to the electric system, to the extent data center load is met with on-site gas generation, gas system costs must also be considered. Data centers’ gas service could also spike

⁴⁷ Bloom energy, *The Bloom Energy Server*, at pdf p. 3 (2025), <https://www.bloomenergy.com/wp-content/uploads/bloom-energy-server-brochure-2025.pdf>.

⁴⁸ U.S. Energy Information Administration, *State Electricity Profiles* (Nov. 10, 2025), <https://www.eia.gov/electricity/state/california/>.

⁴⁹ Shane Snider, *Oracle’s Project Jupiter Ditches Gas Turbines for Bloom Fuel Cells*, DataCenter Knowledge (Apr. 29, 2026), <https://www.datacenterknowledge.com/build-design/oracle-s-project-jupiter-ditches-gas-turbines-for-bloom-fuel-cells>.

⁵⁰ D.23-11-068, *Decision Addressing Remaining Proceeding Issues*, at 148–49 (Nov. 22, 2023), <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M520/K977/520977266.PDF>.

⁵¹ See D.25-05-004, *Decision Granting Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company’s Petition for Modification of Decision 23-11-068 and Denying Bloom Energy Corporation’s Petition for Modification of Decision 23-11-068*, at 10 (May 20, 2025), <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M566/K891/566891701.PDF>.

infrastructure costs. For example, PG&E's 2025 gas line subsidy application included a request from a data center seeking to connect to PG&E's gas distribution system at a capacity of 7,200 MBtu/hour.⁵² Meeting the significant gas demand from these facilities may require capacity expansion to the gas system, the costs of which have historically been socialized across ratepayer classes. While the Commission now requires the full cost of line extensions to be paid by the requesting new gas customer with limited exceptions, that decision did not address potential additional costs of increasing capacity in existing gas lines to meet the significant gas demand from these facilities.⁵³ The stranded asset consequences of increasing gas system capacity to meet data center needs are even more acute where applicants are seeking a temporary connection to allow on-site gas generation to power a data center while waiting on electric service.⁵⁴ Accordingly, any consideration of tariffs for data centers using on-site gas generation must wholistically look at potential gas system costs to ensure residential and other customer classes to not bear the costs of these facilities.

III. CONCLUSION

Thank you for your consideration of these Reply Comments on the OIR.

Dated: May 21, 2026

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⁵² A.25-07-002, Application of Pacific Gas and Electric Company (U 39 M) on Behalf of Customers Seeking a Gas Line Subsidy Pursuant to the Requirements of D.22-09-026, at 4 (July 1, 2025), <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M571/K244/571244398.PDF>.

⁵³ See D.22-09-026, *Phase III Decision Eliminating Gas Line Extension Allowances, Ten-Year Refundable Payment Option, and Fifty Percent Discount Payment Option Under Gas Line Extension Rules* (Sept. 20, 2022), <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M496/K987/496987290.PDF>.

⁵⁴ A.25-05-009, Exh. EDF-01-A, Errata to Opening Testimony of Michale Colvin on Behalf of Environmental Defense Fund, Appendix I, PG&E Response to EDF Data Request #2, Q.6(b), <https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2505009/9060/602766104.pdf> (noting eight of 20 data center applicants for connections to PG&E's gas system also submitted interconnection requests to PG&E's electric system).

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