

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

PRESIDENT JOHN REYNOLDS, in attendance

ADMINISTRATIVE LAW JUDGE JOANNA PEREZ-GREEN, presiding

Order Instituting Rulemaking on	)	PREHEARING
California Advanced Electric Rate	)	CONFERENCE
Design.	)	
	)	Rulemaking
	)	26-04-009

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Virtual Proceeding
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ADMINISTRATIVE LAW JUDGE PEREZ-GREEN: We are
on the record.

This is the remote prehearing conference for
Rulemaking 26-04-009 on California Advanced Electric
Rate Design. I am Joanna Perez-Green, the assigned
administrative law judge to this proceeding, and the
assigned commissioner is President Reynolds, who is here
with us today.

President Reynolds, would you like to provide
some opening remarks?

PRESIDENT REYNOLDS: Thank you, Judge
Perez-Green, and good morning everyone.

I'm excited to be here to open this prehearing
conference for the California Advanced Electric Rate
Design proceeding. We opened this proceeding two months
ago on April 9. Since then, we've received 30 comments
and 14 reply comments from parties to our Order
Instituting Rulemaking, and they've already started to
inform our work.

To reiterate what was in that OIR, our goal in
this proceeding is to improve how our electric rates
reflect the costs of providing service, and how those

1 costs are allocated fairly across all customers. The
2 mechanism we're using to achieve that goal will be
3 updates to both residential and non-residential rate
4 structures and their underlying cost inputs.

5 The OIR introduced several topics that we want
6 to focus on which serve this goal, including potential
7 updates to time-of-use rates, reclassification of
8 certain costs as fixed costs, adjustments to the base
9 services charges, and strategies to incorporate new
10 large loads, like data centers.

11 We know that accurate price signals in electric
12 rates can spur demand flexibility, drive investment
13 decisions, and ensure that ratepayers are charged more
14 fairly for the costs of generating and delivering power.
15 Centering cost causation principles as the foundation of
16 electric rate design is the key tool we have for
17 avoiding cost shifts between ratepayers.

18 Of course, we must be thoughtful in how we
19 enact significant reforms such as these, taking into
20 account the nascent impacts of recent reforms we've
21 already adopted, the maturity of certain technologies,
22 as well as the risks of inaction.

23 And I do want to emphasize that being able to
24 deliver adjustments to rate design with some degree of
25 speed and flexibility is a real value that I think we

1 will want to support going into the future of the
2 electric grid, and I'm looking forward to proposals that
3 will enable that here.

4 For today, in particular, I am hoping to have
5 active participation from parties, including the
6 utilities, to give input on the tentative schedule
7 circulated by Judge Perez-Green.

8 The target dates listed for the proposals,
9 workshops, and proposed decisions necessary to advance
10 these reforms under consideration include many items
11 undertaken in parallel and in sequence. We feel that
12 the schedule is ambitious and meets the urgency of the
13 moment. However, we also want to ensure that it is
14 feasible and will be an efficient process.

15 I took note in the party comments we've already
16 received that there is some consensus around the topics
17 that should be prioritized or scoped in the proceeding,
18 but also some significant differences of opinion.

19 So I look forward to hearing more from the
20 parties here today. Your participation will be
21 essential as we think about how to scope this new
22 proceeding and ensure that our future electricity system
23 is better grounded in equitable and affordable rates,
24 while handling rapid load growth and cost allocation
25 challenges.

1 Thank you for joining us. I will be with you
2 for as long as I can this morning, but my advisor,
3 Justin Galle, will be listening in to the rest of the --
4 of the PHC, and I look forward to working with everyone
5 here over the course of this proceeding.

6 Back to you, Judge Perez-Green.

7 ALJ PEREZ-GREEN: Thank you so much, President
8 Reynolds.

9 The purpose of this prehearing conference is to
10 address procedural matters, including scope of issues,
11 schedule, categorization, and need for hearing. These
12 matters will ultimately be determined by President
13 Reynolds and issued in a forthcoming scoping memo and
14 ruling.

15 For the benefit of the court reporter and to
16 ensure a clear complete record, I would like to remind
17 everyone to please mute your phones or computers when
18 not speaking, and refrain from side conversations.
19 Please do not speak unless I call on you to speak.
20 Please introduce yourself every time before we speak.
21 Please speak slowly and clearly. An expedited
22 transcript of today's hearing has been ordered.

23 And we have multiple parties speaking in
24 today's prehearing conference. Please take no more time
25 than the time allocated, unless I provide other

1 guidance.

2 In Commission proceedings, those who have filed
3 comments to the Order Instituting Rulemaking, or OIR,
4 are automatically added as a party to the proceeding and
5 to the service list. As noted in the ruling issued on
6 May 22nd, I will not be entertaining oral motions for
7 party status today. Those who wish to become a party
8 may submit written requests for party status in
9 accordance with Rule 1.4 of our Rules of Practice and
10 Procedure. If you do not want to become a formal party,
11 but do wish to follow the proceeding, you have two
12 options, the links to which are going to be included in
13 the chat -- in the chat box where I will share.

14 In the first option, you can receive notice of
15 documents that are published in this proceeding's docket
16 by subscribing at subscribe@cpuc.ca.gov, or you can --
17 if you wish to be on the distribution list that we and
18 all parties use to serve documents that are filed on
19 this proceeding's docket, you can submit an addition to
20 a service list form to the Commission's Process Office
21 requesting to be added to the service list as
22 information only. The form is available at
23 https://ia.cpus.ca.gov/servicelists/sl_index.htm.

24 Now I will take appearances. Please note that
25 I will only take appearances of representatives and

1 parties who indicated in advance that they wanted to
2 make comments today. There are some exceptions for
3 those who were not added to the service list in time.
4 To find the full formal party list, you can check with
5 the proceeding service list.

6 When I call on each entity, I would like the
7 designated representative to state their first name.

8 We have Bear Valley Electric Service and
9 Liberty Utilities, or CalPeco.

10 MR. GIBSON: Yes. Good morning, your Honor.
11 Jed Gibson, G-i-b-s-o-n, on behalf of Bear Valley
12 Electric Service and Liberty Utilities.

13 ALJ PEREZ-GREEN: Building Decarbonization
14 Coalition?

15 MS. MENTEN: Good morning. Good morning. It's
16 Beckie Menten, B-e-c-k-i-e space M-e-n-t-e-n. Thank
17 you.

18 ALJ PEREZ-GREEN: Cal Advocates?

19 MS. AKIYA: Good morning, your Honor. Kimiko
20 Akiya on behalf of Cal Advocates, K-i-m-i-k-o A-k-i-y-a.
21 Thank you.

22 ALJ PEREZ-GREEN: California Environmental
23 Justice Alliance?

24 MS. LAZEROW: Good morning, your Honor. Shana
25 Lazerow, S-h-a-n-a L-a-z-e-r-o-w, on behalf of CEJA, or

1 California Environmental Justice Alliance.

2 ALJ PEREZ-GREEN: California Large Energy
3 Consumers Association.

4 MS. SHERIFF: Good morning, your Honor. Nora
5 Sheriff, S-h-e-r-i-f, as in frank, F, as in frank, on
6 behalf of the California Large Energy Consumers
7 Association, or CLECA.

8 ALJ PEREZ-GREEN: California Community Choice
9 Association.

10 MR. JOHNSTON: Good morning, your Honor. Kevin
11 Johnston, J-o-h-n-s-t-o-n, on behalf of the California
12 Community Choice Association, or CalCCA. Thank you.

13 ALJ PEREZ-GREEN: California Solar and Storage
14 Association.

15 MR. HEAVNER: Good morning, your Honor. Brad
16 Heavner on behalf of the California Solar and Storage
17 Association, or CALSSA, B-r-a-d, last name
18 H-e-a-v-n-e-r. Thank you.

19 ALJ PEREZ-GREEN: Center for Accessible
20 Technology?

21 MS. KASNITZ: Good morning, your Honor.
22 Melissa Kasnitz, K-a-s-n-i-t, like Tom, Z, like zebra,
23 for Center for Accessible Technology, or CforAT.

24 ALJ PEREZ-GREEN: Enchanted Rock?

25 MS. HENDREN: Good morning, your Honor.

1 Chastity Hendren, H-e-n-d-r-e-n, for Enchanted Rock, or
2 ERock.

3 ALJ PEREZ-GREEN: Environmental Defense Fund?

4 MR. COLVIN: Good morning, your Honor. My name
5 is Michael Colvin, C-o-l-v, like in Victor, i-n, on
6 behalf of Environmental Defense Fund, or EDF.

7 ALJ PEREZ-GREEN: Natural Resources Defense
8 Council?

9 MS. KUBIAK: Good morning, your Honor. My name
10 is Lauren Kubiak on behalf of the Natural Resources
11 Defense Council, L-a-u-r-e-n K-u-b-i-a-k. Thank you.

12 ALJ PEREZ-GREEN: Pacific Gas and Electric
13 Company.

14 MS. WILSON: Good morning, your Honor. This is
15 Maria Wilson on behalf of Pacific Gas and Electric
16 Company, M-a-r-i-a, last name Wilson, W-i-l-s-o-n.
17 Thank you.

18 ALJ PEREZ-GREEN: PacifiCorp?

19 MR. DALLAS: Yes, Joe Dallas on behalf of
20 PacifiCorp, J-o-e D-a-l-l-a-s.

21 ALJ PEREZ-GREEN: San Diego Gas & Electric?

22 MS. HANSSON: Good morning, your Honor, Rebecca
23 Hansson on behalf of San Diego Gas and Electric Company,
24 or SDG&E. Hansson is H-a-n-s-o -- s-s-o-n.

25 ALJ PEREZ-GREEN: Sierra Club.

1 MR. VESPA: Good morning, your Honor. Matt
2 Vespa with Sierra Club, M-a-t-t V, as in Victor, e-s-p,
3 as in Paul, A.

4 ALJ PEREZ-GREEN: Small U -- Business Utility
5 Advocates.

6 MS. WEBERSKI: Thank you, your Honor. Jennifer
7 Weberski on behalf of Small Business Utility Advocates,
8 or SBUA, last name spelled W-e-b, like boy, e-r-s-k-i.

9 ALJ PEREZ-GREEN: Solar Energy Industries
10 Association.

11 MS. ARMSTRONG: Yes. Good morning. Jeanne
12 Armstrong, Jeanne spelled J-e-a-n-n-e, and I'm on behalf
13 of the solar industries -- Solar Energy Industries
14 Association, or SEIA.

15 ALJ PEREZ-GREEN: Southern California Edison
16 Company.

17 MR. JERMAN: Good morning, your Honor, and good
18 morning, President Reynolds. This is Ryan Jerman
19 appearing for Southern California Edison Company. My
20 name is spelled R-y-a-n, last name J-e-r-m-a-n.

21 ALJ PEREZ-GREEN: Tesla?

22 (No response.)

23 ALJ PEREZ-GREEN: Vehicle to Grid
24 Integration -- Integration Council.

25 MR. SCHWARTZ: Sorry.

1 ALJ PEREZ-GREEN: Oh, let's go back to Tesla.

2 MR. SCHWARTZ: Apologies. Yeah. Good morning,
3 your Honor and -- and President Reynolds. Andy Schwartz
4 on behalf of Tesla, first name Andy, A-n-d-y, last name
5 Schwartz, S-c-h-w-a-r-t-z.

6 ALJ PEREZ-GREEN: Vehicle to Grid Integration
7 Council.

8 MS. PRATT: Thank you, your Honor. Grace Pratt
9 on behalf of the Vehicle-Grid Integration Council, or
10 VGIC. My name is spelled G-r-a-c-e, last name
11 P-r-a-t-t.

12 ALJ PEREZ-GREEN: Wikler Consulting, LLC.

13 MR. WIKLER: Good morning, your Honor, Greg
14 Wikler with Wikler Consulting, LLC. That's W-i-k-l-e-r.
15 Thank you.

16 ALJ PEREZ-GREEN: I believe I've missed a
17 couple.

18 So I'm going to go to the utility action
19 network.

20 MS. KRIKORIAN: Oh, yes. Good morning, your
21 Honor. I believe that's us.

22 I'm Jane Krikorian on behalf of Utility
23 Consumers' Action Network, or UCAN. My name is spelled
24 J-a-n-e K-r-i-k-o-r-i-a-n. Thank you.

25 ALJ PEREZ-GREEN: Do we have Ms. Torres from

1 TURN, as well?

2 MS. TORRES: Yes, your Honor. Good morning.
3 This is Elise Torres from TURN, or The Utility Reform
4 Network, and my name is spelled Elise, E-l-i-s-e,
5 Torres, T-o-r-r-e-s. Thank you.

6 ALJ PEREZ-GREEN: Thank you. And have I -- is
7 there anyone else here today?

8 (Line muted.)

9 PRESIDENT REYNOLDS: Judge, you're on mute.

10 ALJ PEREZ-GREEN: I'd like to thank parties for
11 their comments to the OIR, which we have reviewed.

12 As we move our discussion to the issues and
13 schedule, I'll remind everyone that final issues will be
14 in the scoping memo and ruling by President Reynolds.
15 I'll be referencing the procedural email that I sent to
16 the service list on June 16th, and subsequently
17 June 17th.

18 Let's first hear from parties on whether the
19 Commission should include the proposed additional issues
20 to the proceeding as follows: Whether the Commission
21 should consider retail rate design and cost allocation
22 for transmission revenue requirements approved by
23 Federal Energy Regulatory Commission, and whether the
24 Commission should consider export compensation for
25 electric vehicles.

1 I ask everyone to take no more than two minutes
2 to respond, and let's begin with Bear Valley, Mr. -- and
3 CalPeco.

4 MR. GIBSON: Yes. Thank you, your Honor. Jed
5 Gibson for Bear Valley and Liberty Utilities.

6 We have no objections to the inclusion of these
7 additional issues within the scope.

8 Just briefly, without going too far into
9 reiterating what we provided in the joint comments with
10 PacifiCorp, we would note that there is some significant
11 differences between the small utilities and the large
12 utilities, and we think that it's important for the
13 Commission to take those differences into consideration
14 when it's deciding what revisions and issues to address
15 within this proceeding. Thank you.

16 ALJ PEREZ-GREEN: We -- everyone will get an
17 opportunity to speak more in depth on other OIR issues,
18 just as a reminder.

19 Building Decarbonization Coalition?

20 MS. MENTEN: Yes. Thank you, your Honor. We
21 have no issue with these issues being scoped into the
22 proceeding. Thank you.

23 ALJ PEREZ-GREEN: Cal Advocates?

24 MS. AKIYA: Thank you, your Honor. Kimiko
25 Akiya on behalf of Cal Advocates.

1 For the issue on transmission, we would ask for
2 some clarification on what the Commission seeks to
3 achieve in the proceeding with that particular issue,
4 and if it is included, we would recommend that the
5 Commission focus on retail transmission rate and cost
6 allocation analysis as it relates to data center and
7 very large load customer class and/or alternative rates
8 for data center and very large load customers, with --
9 with reference to that first bullet point on the
10 additional issues. Thank you, your Honor.

11 ALJ PEREZ-GREEN: CEJA?

12 MS. LAZEROW: Regarding the transmission
13 issues, CEJA strongly supports including all of the
14 costs that could be imposed on ratepayers due to
15 incoming data centers in a data center's track; so on
16 the first issue, yes, support including it.

17 On the second issue, the -- the question of
18 EV-specific charging rates, we believe it is better
19 addressed in the High DER proceeding or other
20 proceedings. We think it's important, given the large
21 scope of rate reform envisioned in this proceeding, that
22 we not relitigate issues that are already live in other
23 proceedings. However, CEJA, to the extent that this is
24 not being litigated elsewhere, does believe that this is
25 an important rate issue to be resolved; not clear that

1 this is the appropriate proceeding for it. Thank you.

2 ALJ PEREZ-GREEN: CLECA?

3 MS. SHERIFF: Your Honor, President Reynolds,
4 Nora Sheriff on behalf of CLECA.

5 Regarding the first issue, the transmission
6 retail rate design, we do believe that that should be
7 considered at a later stage of the proceeding, and
8 the -- what should be included -- to develop the record,
9 we should look at what the existing rate design is, what
10 the existing cost allocation is, the amount of those
11 transmission revenue requirements, and perhaps a -- a
12 forecast of how those amounts are expected to grow, as
13 well as information around the cost drivers for those
14 revenue requirements.

15 On the second issue, the export compensation
16 for electric vehicles, CLECA will simply raise the
17 concern -- in the midst of this affordability crisis
18 with which we are all struggling raise the concern about
19 a potential cost shift and the need to be very very
20 careful to avoid any potential cost shift when looking
21 at export compensation for electric vehicles. Thank
22 you.

23 ALJ PEREZ-GREEN: CalCCA?

24 MR. JOHNSTON: Thank you, your Honor. Kevin
25 Johnston for CalCCA.

1 No issues with the additional items in scope,
2 but given the inclusion of the second item regarding
3 export compensation for electric vehicles, in our
4 opening comments, we asked that the Commission include
5 consideration of rate design in export compensation
6 frameworks that maximize the value of behind-the-meter
7 storage resources. So if the Commission's already
8 considering export compensation issues, we believe it
9 would be consistent to also evaluate export compensation
10 and operational incentives for stationary
11 behind-the-meter storage, as well. Current restrictions
12 on storage exports and grid charging unnecessarily limit
13 the ability of these resources to provide for grid
14 services, improve affordability, and support
15 electrification goals, which are all in line with the
16 goals the Commission is considering in this proceeding.

17 We have an additional scoping item sort of in
18 the data center vein, but I will save that for the other
19 open period. Thank you, your Honor.

20 ALJ PEREZ-GREEN: CALSSA?

21 MR. HEAVNER: Brad Heavner with CALSSA.

22 We support including both of these items.
23 Particularly on the second one, other venues have proved
24 insufficient in -- in reaching conclusions on the
25 question of export rates for electric vehicles, and this

1 is an opportunity to look at that important question
2 comprehensively. Thank you.

3 ALJ PEREZ-GREEN: CforAT?

4 MS. KASNITZ: Thank you, your Honor. CforAT
5 has no objection to including either of the issues, but
6 we do request, when we get to the schedule portion of
7 the proceeding, that the addition of these issues should
8 not serve to delay review of residential rates and
9 residential rate reform. That issue is fundamental to
10 the day-to-day life of the people we represent, and all
11 California residents, and the ongoing affordability
12 crisis means that residential rates need to be given a
13 key priority in the proceeding. Thank you.

14 ALJ PEREZ-GREEN: ERock?

15 MS. HENDREN: Thank you, your Honor. Chastity
16 Hendren for Enchanted Rock.

17 We have no objections to the additional issues
18 proposed, and I think we would echo CalCCA's sentiment
19 on the broader examination of export compensation.
20 Thank you.

21 ALJ PEREZ-GREEN: EDF?

22 MR. COLVIN: Thank you, your Honor. With
23 respect to the issue about transmission revenue rates
24 requirements, EDF supports inclusion of that item.

25 With respect to export compensation for

1 electric vehicles, EDF would encourage the Commission,
2 if it was to be included in the scope, to further refine
3 that there might be a need to distinguish between
4 passenger-level EV vehicles and heavy-duty vehicles in
5 that we might, in terms of phasing, want to bin
6 passenger vehicles more closely aligned with residential
7 rate design issues, and we might want to bin export
8 compensation for heavy-duty vehicles more closely
9 aligned with other larger commercial loads; that it
10 might be more fruitful to have those conversations be
11 happening in parallel. Thank you.

12 ALJ PEREZ-GREEN: NRDC?

13 MS. KUBIAK: Good morning. Lauren Kubiak with
14 NRDC.

15 We have no objection to including those issues
16 in the scope of the proceeding. Thank you.

17 ALJ PEREZ-GREEN: PG&E.

18 MS. WILSON: Thank you, your Honor. Maria
19 Wilson for PG&E.

20 On the first item, PG&E is supportive of this
21 proceeding considering rate design proposals for
22 transmission components. However, PG&E believes FERC
23 approval is needed for implementation of any rate design
24 changes authorized in this proceeding; so timing of
25 implementation may be an issue.

1 Second, PG&E does not support adding export
2 compensation to this OIR. While that issue is
3 important, export compensation raises crosscutting
4 issues that, although it may include rate design
5 elements, also raise issues that go far beyond the
6 issues contemplated for this OIR. So we are not
7 supportive of that item. Thank you.

8 ALJ PEREZ-GREEN: PacifiCorp?

9 MR. DALLAS: Thank you, your Honor. Joe Dallas
10 on behalf of PacifiCorp.

11 PacifiCorp has no concerns with the two
12 additional items. Thank you.

13 ALJ PEREZ-GREEN: SDG&E.

14 MS. HANSSON: Thank you, your Honor and
15 President Reynolds.

16 On both of these issues, SDG&E does not support
17 including them within the scope of this proceeding.
18 This proceeding already has a significant number of
19 issues, and SDG&E contends that these -- these
20 additional issues are unnecessary, and that they are at
21 least partially previously considered in the Demand
22 Flexibility proceeding. In that -- that Demand
23 Flexibility proceeding, or relative pricing proceeding,
24 both of these issues were at least touched on; and that
25 was a very recent proceeding. The Commission, for one,

1 addressed what an export compensation rate should look
2 like in that proceeding. If you looked at Conclusion of
3 Law 24 in the Demand Flexibility Guidance Decision --
4 that's D.25-08-049 -- the Commission also addressed what
5 a transmission rate component, for purposes of a -- of a
6 demand flexible -- demand flexibility rate proposal,
7 should look like. So, you know, apparently, because the
8 Commission has already recently addressed both of these
9 issues, and including in some detail, SDG&E does not
10 believe it should be added here to what is already,
11 again, a very complicated proceeding with many issues
12 already.

13 Thank you, your Honor. Thank you, President
14 Reynolds.]

15 ALJ PEREZ-GREEN: Sierra Club?

16 (No response.)

17 ALJ PEREZ-GREEN: Mr. Vespa?

18 (No response.)

19 ALJ PEREZ-GREEN: Small Business Utility
20 Advocates.

21 MS. WEBERSKI: Thank you, your Honor. Jennifer
22 Weberski on behalf of SBUA.

23 We don't have an objection, per se, to the
24 inclusion of the two issues. Our only concern is that
25 when we are discussing the schedule, that those two

1 issues are scoped such that the issues surrounding small
2 businesses are not pushed beyond what is already laid
3 out within the schedule. We understand as the schedule
4 was presented that there seemed to be a propensity to do
5 residential rate as a priority. But the affordability
6 crisis is affecting small business customers at an
7 alarming rate, similar to residential. So we are
8 concerned that with the addition of the two issues, it
9 not push it -- the scope up, for the affordability, with
10 respect to the small business customers.

11 Thank you.

12 MR. VESPA: Your Honor, this is Matt Vespa for
13 Sierra Club. Sorry. I heard you, and then I went to
14 unmute and the window closed for some reason.

15 So, if I may?

16 ALJ PEREZ-GREEN: Please.

17 MR. VESPA: Thank you.

18 With regard to the first issue on the FERC
19 transmission, Sierra Club does support the conclusion.
20 This was an issue -- perhaps in the data center track --
21 this was an issue that came up in PG&E's Rule 30
22 proceeding and think it should be addressed holistically
23 here.

24 With regard to the export compensation, we're
25 open to its inclusion; though we share the concerns ^say

1 ha^ raised, given the volume of issues here, whether
2 another proceeding might be more appropriate to address
3 this issue. If not, this would be a place to do that.

4 ALJ PEREZ-GREEN: SEIA?

5 MS. ARMSTRONG: Yes. Thank you, your Honor.

6 We support the inclusion of both these issues.
7 With respect to the first one, SEIA has long raised this
8 issue in GRCs, even though we -- we knew that, you know,
9 transmission rates were not within the Commission
10 jurisdiction, we wanted to sort of peel back the veil
11 and see what was underlying to better assist the
12 Commission with their advocacy on behalf of Californians
13 at the FERC. So we do believe this is a -- an issue
14 that's right to be looked at.

15 With respect to the export compensation for
16 electric vehicles, we in our reply comments on the OIR
17 supported VGIC in its efforts to get this issue brought
18 into the OIR. Recently, as part of Southern California
19 Edison's last GRC Phase 2, a settlement was presented to
20 the Commission which would have provided a
21 vehicle-to-grid program in SCE's service territory
22 pricing export compensation at avoided costs, and it was
23 rejected by the Commission. So we do think with the
24 increase of this technology, and it becoming more
25 prevalent across all IOU service territory, this issue

1 needs to be looked at. And this is as good as home as
2 any.

3 So, thank you.

4 ALJ PEREZ-GREEN: SCE?

5 MR. JERMAN: Thank you, your Honor.

6 Ryan Jerman for SCE.

7 SCE opposes including the retail rate design
8 and cost allocation for transmission revenue
9 requirements issue in scope, and that's for a couple
10 reasons:

11 One, this rulemaking was opened to address
12 certain important and complex rate design issues. And
13 retail rate design and cost allocation for transmission
14 revenue requirements are complex issues that raise
15 unique questions, including jurisdictional questions,
16 that do not impact the other scoped issues. So we think
17 it would be counterproductive to the timely, successful
18 consideration of the other issues in this proceeding to
19 add this new one to scope.

20 Second, there's no need to consider this issue
21 here, because there are other proceedings in which it
22 can be addressed. And, specifically, these are FERC
23 proceedings. So for SCE, our transmission cost
24 allocation and rate design are addressed in our
25 formula -- FERC formula rate proceedings, which the

1 Commission has been a party to. The Commission has even
2 been party to settlements in those proceedings.

3 And I would also note that just this morning,
4 FERC issued a 206 Order to Show Cause addressed to the
5 ISO and transmission owners in California that addresses
6 cost shifting and cost impacts related to large-load
7 customers. This new proceeding is another one where
8 transmission cost allocation rate design issues can be
9 addressed.

10 And the third reason for not including it in
11 scope is this jurisdictional issue. As I mentioned, our
12 transmission cost allocation and rate design are
13 determined and approved in FERC jurisdictional
14 proceedings. If the Commission were to attempt to
15 address them here, it could create a jurisdictional
16 conflict. And SCE believes that this conflict is best
17 addressed and best resolved in a FERC proceeding, not in
18 this CPUC proceeding.

19 And then on the second new proposed issue, SCE
20 is not opposed to including the export compensation
21 issue in scope. But I echo comments by a few other
22 parties, that we believe it should be addressed in a --
23 a trailing track, after consideration of the residential
24 rate design issues.

25 Thank you.

1 ALJ PEREZ-GREEN: Tesla?

2 MR. SCHWARTZ: Thank you, your Honor. Andy
3 Schwartz, on behalf of Tesla.

4 Tesla has no position on the first issue
5 mentioned regarding retail rate design and cost
6 allocation for transmission revenue requirements.

7 Regarding the second issue, v-to-g export
8 compensation, Tesla supports including this issue in the
9 scope of this proceeding. We thought it would be
10 helpful, as the Commission considers this, to offer the
11 perspective from the vantage point of the manufacturer
12 that is actively investing in v-to-g storages today. I
13 want to underscore for the Commission this -- that this
14 technology is real and there are active efforts --

15 (Reporter clarification.)

16 MR. SCHWARTZ: Oh, sure. Yeah. Apologies.

17 We thought it would be helpful as the
18 Commission considers this to offer the perspective --

19 (Reporter clarification.)

20 MR. SCHWARTZ: -- from the vantage point of a
21 manufacturer that is actively investing in v-to-g
22 solutions today. I want to underscore for the
23 Commission that this technology is real, and there are
24 active efforts underway to deploy v-to-g systems in
25 California via the IOUs' v-to-g pilot programs. We have

1 a number of interconnection applications that are in
2 process before the California IOUs and expect to
3 interconnect hundreds of these systems this year, under
4 the auspices of these pilots.

5 Bidirectional EVs represent a new asset class
6 that has the potential to cost-effectively provide grid
7 services at significant scale, despite the potential and
8 efforts to establish an interconnection pathway for
9 these systems. To date, outside of the CPUC's emergency
10 load reconduction program and the CEC's demand site grid
11 support program, the futures of which are rightly
12 uncertain, there are no pathways and certainly no
13 longer-term pathways that provide meaningful
14 opportunities to consistently leverage these resources
15 to provide grid services and to compensate them for
16 value provided. This proceeding provides an opportunity
17 to remedy that and establish a more durable and
18 comprehensive approach.

19 Thank you.

20 ALJ PEREZ-GREEN: TURN?

21 MS. TORRES: Thank you, your Honor. TURN
22 supports the inclusion of the first issue and encourages
23 the Commission to include it in the non-residential rate
24 reform track, or the data center track if a separate
25 track is created for data center rate design. And TURN

1 takes no position on the second issue.

2 ALJ PEREZ-GREEN: UCAN.

3 MS. KRIKORIAN: Thank you, your Honor.

4 UCAN supports including the two issues in the
5 proceeding. UCAN commented extensively in our
6 22-07-005, the precursor to this proceeding, on the
7 benefits of hourly retail transmission pricing and
8 recommended that the Commission oversee the process of
9 design and incorporating transmission components into
10 demand flexible rates. So, here, UCAN diverges from the
11 opinions of the IOUs on the jurisdictional issue. It is
12 our understanding that FERC approves overall revenue
13 amounts, but that the CPUC can and should oversee the
14 retail design. And this is important for ratepayers.

15 On the second issue of export rates, UCAN
16 supports that issue, believing that export rates could
17 greatly benefit ratepayers by allowing a flexible
18 resource to be optimized.

19 Thank you.

20 ALJ PEREZ-GREEN: VGIC.

21 MS. PRATT: Thank you, your Honor.

22 VGIC does not have a position on the first
23 issue surrounding transmission rate components.

24 On the second issue, VGIC strongly supports
25 adding EV export compensation and export compensation

1 more broadly to the scope of this proceeding. I believe
2 that we are the party that first proposed this in OIR
3 comments. As discussed by Tesla there are a growing
4 number of bidirectional EVs that can provide a wide
5 variety of grid services. The California Energy
6 Commission has already estimated that EV battery
7 capacity in California exceeds the state's installed
8 stationary storage capacity. And the CEC has also
9 highlighted bidirectional EV discharge as the single
10 largest source of demand flexibility.

11 However, the state really lacks a consistent
12 framework to value EV exports. There has been some
13 discussion of export rates, specifically for dynamic
14 rate structures. But that rate design is quite specific
15 and should not be the only framework by which customers
16 are able to provide exports.

17 As highlighted by SEIA earlier, the Commission
18 recently took up this issue a little bit in Southern
19 California Edison's GRC Phase 2. In that decision, the
20 Commission highlighted a desire to consider broader
21 export ratemaking policy before adopting a specific EV
22 export rate. The Commission specifically highlighted
23 three issues:

24 One, the accuracy and cost-effectiveness of
25 avoided cost calculator based, versus realtime marginal

1 cost based credits and reflecting marginal costs;

2 Two, customer preferences and behaviors
3 regarding export rates;

4 And, three, customer and broader distributed
5 energy resource export flexibility under different
6 compensation structures.

7 We believe that since this proceeding is the
8 broad ratemaking rate design rulemaking, this issue is
9 appropriately considered here and not in other venues,
10 such as the High DER proceeding that is frankly ill
11 equipped to take up an export tariff, such as the one
12 that we would like to discuss.

13 Thank you, your Honor.

14 ALJ PEREZ-GREEN: Wikler Consulting.

15 MR. WIKLER: Thank you, your Honor.

16 Greg Wikler with Wikler Consulting.

17 We take no position on the first issue.
18 Regarding the second issue, we wholeheartedly support
19 the inclusion of export compensation for electric
20 vehicles. In -- consistently, in line with the comments
21 from Tesla and VGIC, we believe that inclusion of export
22 compensation for EVs and bidirectional charging tariffs
23 are essential for meeting California's flexible demand
24 goals that are state policy goals and priorities
25 currently for the state. So we support inclusion of

1 this issue in the -- in the proceeding.

2 Thank you.

3 ALJ PEREZ-GREEN: Thank you, everyone, for your
4 input on these two items.

5 On April 9th, 2026, the OIR preliminary
6 categorized this rulemaking as ratesetting and indicated
7 that there may be a need for evidentiary hearings. The
8 parties largely agreed with the OIR on those matters.

9 The June 16th procedural email included a
10 schedule with issues, as well as a sequencing of
11 procedural events. At a high level, there was AB 2109,
12 which includes a joint investor-owned utility proposal,
13 data centers, residential rate reform, non-residential
14 rate reform, and marginal costs, which includes a joint
15 investor-owned utility report.

16 I am going to give parties up to three minutes,
17 and this will be to respond to the schedule and issues.
18 And if parties have further comment on categorization
19 and need for hearings, they may do so at this time.
20 Because of the amount of participants, this will likely
21 be your last opportunity to provide input. So, if -- so
22 you may prioritize as you need.

23 Let's start with Bear Valley Electric Service
24 and CalPeco.

25 MR. GIBSON: Thank you, your Honor. Jed Gibson

1 for Bear Valley and Liberty.

2 To reiterate what we provided in opening
3 comments with PacifiCorp, the small utilities are
4 differently situated than the large utilities in a lot
5 of respects. With respect to AB 2109, I would note that
6 the small utility service territories are less conducive
7 commercial and industrial customers. Similarly, there
8 were a few large energy users or -- there's little
9 demand for data center growth in the small utility
10 service territories. Similarly, we -- the small
11 utilities have different rate structures, they aren't
12 subject to Commission-mandated time of use rates.

13 There are -- the base services charges are only
14 recently being implemented by the small utilities. So
15 we -- we feel that these distinctions should be
16 accounted for in -- in scheduling the issues to be
17 addressed in the proceeding. And it may be more
18 efficient to address small utility issues separately
19 from the large utilities, just given the differences in
20 requirements and differences in how reforms may be
21 implemented. So we would encourage just taking those
22 considerations into account when developing a schedule
23 through the proceeding and potentially figuring out
24 which issues are large-IOU-specific and which may not
25 apply to the small utilities and -- in crafting the

1 schedule and allowing more efficient party participation
2 going forward.

3 Thank you.

4 ALJ PEREZ-GREEN: Building Decarbonization
5 Coalition?

6 MS. MENTEN: Thank you, your Honor. Again,
7 this Beckie Menten, representing the Building
8 Decarbonization Coalition.

9 We think the categorization of the proceeding
10 is good. Regarding scope, specifically with the
11 residential rate reform, we urge that the scope of
12 issues considered in residential rate reform be set
13 broadly. Specifically, however, it should include
14 consideration of changes to baseline rates, time of use
15 rates, dynamic rates, and fixed charges.

16 On the schedule of the proceeding, we do
17 recommend that the proposed schedule be revised to issue
18 a proposed decision on residential rate reform in the
19 first half of 2017. Local air districts and the
20 California Air Resources Board have already set targets,
21 or are setting targets, for the phase out of gas
22 appliances that will begin in 2028. And having rates
23 that reflect the marginal cost of electrification and
24 allow customers to better manage bills will be critical
25 for maintaining customer affordability. Since it will

1 take many months, if not years, for changes imposed in a
2 decision to be reflected in changes in customer bills,
3 it's critical that the Public Utilities Commission act
4 as fast as it can in this proceeding.

5 Thank you.

6 ALJ PEREZ-GREEN: Cal Advocates.

7 MS. AKIYA: Thank you, your Honor. Kimiko
8 Akiya on behalf of Cal Advocates.

9 With regard to the -- the bullet point on data
10 centers and SB 57 assessment, we would ask for more
11 information on the process or schedule beyond the SB 57
12 assessment. We do urge the Commission that there's no
13 need to wait for that assessment to be submitted to
14 begin working on the question of whether data centers
15 and large load should be considered a separate class.
16 This is an urgent issue with large ratepayer impacts.
17 And we think it should be made a priority. And so we
18 want to ensure there is ratepayer protections put in
19 place as soon as possible and that is IOUs can implement
20 based on a decision in this proceeding, rather than
21 needing to file additional applications.

22 For the SB 57 report, we would recommend that
23 there be additional discussion with parties about what
24 costs will be captured in the report to solicit feedback
25 on other potential related costs such as generation

1 energy and capacity costs and -- that require direct and
2 indirect cost analysis, as well as analyzing cost shifts
3 from distribution-level data centers, not just
4 transmission-level data centers.

5 In addition to the SB 57 report, we would also
6 say that there is the need to consider whether data
7 centers should be considered a -- data centers, and/or
8 large load customers should be considered a separate
9 class. And that should include a consideration of the
10 load shapes of data centers and large load customers,
11 what size thresholds to analyze and the definition of
12 "data center."

13 And so with all these issues, we think this is
14 a process that should be started in 2026. In addition,
15 we would ask for overall clarification on the other
16 tracks and how they include the tracks raised by Cal
17 Advocates and other parties, and what issues will be
18 included in each track, as well as the timing for
19 comments, workshops, testimony, et cetera.

20 I would also emphasize Cal Advocates' position
21 regarding the last issue -- the last bullet point,
22 regarding marginal costs. We urge the Commission to not
23 consider marginal costs in this proceeding, which other
24 parties independently agreed with in their comments as
25 well.

1 On the E3 tool, we don't see that reflected in
2 this proposed schedule. So we would ask for a timeline
3 to be provided in the scoping memo for parties to
4 comment before the tool is finalized, timing overall of
5 the tool to inform the residential and non-residential
6 rate tracks; because that is going to be an essential
7 tool, as well as how it's finalized for those -- those
8 particular tracks.

9 And then, lastly, we would just reiterate that
10 we urge the Commission to include our proposed issue
11 regarding the ongoing process for monitoring and
12 evaluating dynamic rate design structures and
13 cost-effectiveness. There is a need for a framework to
14 evaluate these rates. The IOUs objected to our proposed
15 issue, but they misunderstood the scope of this proposed
16 issue on our part, in that there is not a framework in
17 place at this point to evaluate these rates. And so
18 it's a narrow issue; but it's an essential one. And
19 it's unclear how it's going to be established, in terms
20 of -- in these separate proceedings. I'm going -- thank
21 you, your Honor.

22 ALJ PEREZ-GREEN: Just wanted to do a time
23 check.

24 MS. AKIYA: Thank you. Yes. That was --

25 ALJ PEREZ-GREEN: Okay.

1 MS. AKIYA: That was my last point.

2 Thank you, your Honor.

3 ALJ PEREZ-GREEN: CEJA?

4 MS. LAZEROW: Thank you, your Honor. Again,
5 Shana Lazerow on behalf of the California Environmental
6 Justice Alliance. As an initial matter, CEJA is
7 extremely appreciative of the -- highlighting the equity
8 issues at play and the need to incorporate the
9 Environmental and Social Justice Action Plan. That
10 really needs to be infused throughout the proceeding.

11 And what that could look like, in terms of a
12 more fleshed out schedule, is having a clear process
13 with set tracks with adequate stakeholder opportunities
14 for involvement. We should consider workshops with
15 commenting opportunities before staff proposals come
16 out, staff office hours to discuss technical questions,
17 especially regarding modeling, would be extremely
18 helpful. And we would just urge the Commission to
19 consider opportunities for more public feedback, if
20 we're considering shifts in how rates are designed.
21 Because, obviously, the public is extremely impacted by
22 affordability at the moment.

23 We're generally supportive of the proposed
24 schedule. The tracks that concern CEJA the most are the
25 data centers track, which should be significantly

1 expanded from the June 16 email. That track should look
2 at landing on a tariff that clearly protects all other
3 ratepayers from bearing the costs and the burdens
4 associated with incoming data centers. That is vital.

5 The residential track should also be proceeding
6 immediately and should include a focus on -- at every
7 stage evaluating impacts on low-income customers. We
8 are not talking about relitigating issues that have
9 already been determined in other proceedings. But as we
10 establish new rates, every shift in rates must be
11 assessed for its potential impacts on the most
12 vulnerable and energy-burdened customers -- sorry.

13 As to the E3 contract, if any new models are
14 developed under this contract, they must have that
15 capability of fully analyzing impacts to low- and
16 moderate-income customers. And, as I mentioned,
17 affordability for those most impacted customers need to
18 be central to any part of any analysis.

19 And I'll close with highlighting that as time
20 has gone by, California's rate structures have become
21 more and more inaccessible. Even practitioners often
22 don't know the full breadth of the programs that folks
23 qualify for and how they impact their rates. So we
24 would request that in this proceeding, in particular,
25 the Commission consider transparency and accessibility

1 of bills and rates.

2 Thank you.]

3 ALJ PEREZ-GREEN: Ms. Sheriff?

4 MS. SHERIFF: Thank you, your Honor, President
5 Reynolds. Nora Sheriff on behalf of CLECA.

6 Regarding the first track for Assembly Bill
7 2109 implementation, CLECA very very strongly supports
8 this timing with this track going first and being
9 separated from the other broader more complex issues.
10 We -- we strongly strongly support that, and urge its
11 retention in the scoping memo.

12 Regarding the non-residential rate reform
13 track, this is critical for inclusion, and we urge the
14 Commission to ensure that the non-residential rate
15 design issues not get lost as you look at the equally
16 important residential rate design issues and the data
17 center issues, and we also don't want the
18 non-residential rate reform issues to be delayed.

19 CLECA also rec- -- recommends inclusion in the
20 non-residential rate design issues the consideration of
21 the need to retain energy-intensive trade-exposed
22 customers as a scoped sub-issue, and to develop a rate
23 design for large industrial customers that sends
24 effective price signals and removes structural barriers
25 to industrial decarbonization investments.

1 Finally, on the last track on marginal costs, I
2 want to raise a concern with the potential overlap of
3 this track's timing with the non-residential rate design
4 track, and suggest respectfully pushing back the
5 marginal costs track, so as to avoid burdening
6 non-residential customer advocates by having that
7 overlap with the non-residential rate design. I do
8 anticipate active engagement by CLECA on both the
9 non-residential rate reform track and on the marginal
10 costs track, and I'm concerned about the potential
11 straining of the resources. Thank you so much.

12 ALJ PEREZ-GREEN: CalCCA?

13 MR. JOHNSTON: Thank you, your Honor. Kevin
14 Johnston for CalCCA.

15 We have no issues with the general proposed
16 schedule. We had identified the need for tracks and to
17 prioritize the data center issue first; so the current
18 proposal satisfies those needs. I think we will
19 certainly have input on sequencing within those tracks
20 as we go along, but, for now, I think the proposed
21 schedule looks about right.

22 In our opening comments, we had requested two
23 additional scoping items. We certainly believe that
24 either of those items are in scope or in the spirit of
25 scope, especially considering the two additions we have

1 discussed today; but, always appreciate the explicit
2 designation.

3 So the first issue we addressed was in the
4 ongoing PG&E Rule 30 proceeding, which is A.24-11-007.
5 There's a proposed settlement which includes an
6 agreement between CalCCA and PG&E for certain
7 information sharing timelines to ensure that CCAs
8 operating in PG&E's territory receive notice of new
9 transmission interconnected loads requesting
10 interconnection at sites where the CCA is the default
11 generation provider. CalCCA recommends that the scope
12 of this proceeding clearly include adoption of similar
13 information sharing provisions in the other large IOU
14 territories, regardless of whether the CPUC determines
15 the new tariffs for data centers and/or other large
16 loads are needed. We believe extending these
17 information sharing provisions across the state improves
18 consistency and promotes the ability of CCAs to serve
19 all of their customers affordably and efficiently.

20 And then the second issue was the inclusion of
21 the export compensation for behind-the-meter storage
22 resources, which we addressed earlier, so I will stop
23 there and say thank you, your Honor.

24 ALJ PEREZ-GREEN: CALSSA?

25 MR. HEAVNER: Brad Heavner for CALSSA.

1 The main recommendation on timing is to break
2 the issues into smaller buckets. This is a large
3 proceeding with a lot of complicated topics, and that
4 should not surprise us. These are all important issues,
5 and the -- this is a good venue to address them, and the
6 Commission should expect to take the time it requires to
7 really address all of these issues. But, it would be
8 problematic if the decisions are grouped into broad
9 categories. It would slow down issues that could move
10 quicker, and I think that the Commission should expect
11 to issue far more than five separate decisions, and to
12 sequence them according to what is more ready to go.

13 For example, residential rate reform on the base
14 services charge discussion will need to wait for the
15 evaluation, and has to begin when there's one calendar
16 year of data available, which will be some time; but,
17 other residential rate design issues, such as TOU
18 reform, baselines, and tiers are ready to be considered
19 right away, and -- and are urgent to help with
20 affordability. And then there are non-residential rate
21 reforms issues that are ready to go before that base
22 services charge discussion would be ready to begin.

23 On AB 2109 implementation, that bill requires
24 the Commission to consider departing load charges for a
25 small set of customers. This is an important question

1 that has become relevant to a large set of customers,
2 and this is a good venue to address it comprehensively.
3 There are protests to advice letters that could
4 potentially put the issue to rest, but it's kind of a --
5 a -- a back door way to do it, or indirect way to do it.
6 There would likely be a complaint proceeding if the
7 utilities begin to actually assess these charges on
8 self-generation, and -- and so this would be a good
9 venue to actually look at the -- at the question, and
10 comp -- comprehensively make a solid decision for
11 departing load charges for all types of customers. And
12 I'd like to emphasize the importance of allowing parties
13 to make proposals. For 2109 implementation, the -- the
14 June 15th ruling says the expectation is to simply
15 respond to IOU proposals, and there should be an
16 opportunity for other parties to make proposals. And
17 the same is true for -- for data center rates and -- and
18 other issues. That's it. Thank you much.

19 ALJ PEREZ-GREEN: CforAT.

20 MS. KASNITZ: Thank you. Melissa Kasnitz for
21 CforAT.

22 As I've already indicated, residential rates
23 are CforAT's priority. I would strongly encourage
24 greater clarity in the plan for the workshops, staff
25 proposals, and comments that are referenced in the

1 information put out before this PHC. I agree with
2 CALSSA that there need to be sub-tracks, and that the
3 sequencing within the residential rate topic is going to
4 be very important. I disagree with CALSSA that we can't
5 begin work on the basic service charge next iteration
6 until data collection is complete. There are a great
7 number of issues, including potential methodology for
8 how to classify customers into moderate or high-income
9 tiers that need to be developed, and where work can
10 begin before the completion of the -- the data
11 collection that Mr. Heavner referenced.

12 Also, in CforAT's comments on the OIR, I raised
13 the issue of the need to consider specifically the
14 impacts of any change in the use of a default tiered
15 rate structure on medical customers, and particularly on
16 the structure of the Medical Baseline Program, which is
17 set in statute. I want to ensure that that issue is not
18 overlooked.

19 And finally, I support much of what was said by
20 CEJA regarding the importance of public input, focus on
21 ESJ communities and other vulnerable populations, and
22 increased transparency of bills and rates so that the
23 public has a better understanding of what is driving the
24 very high costs that they are seeing for electricity.
25 Thank you very much.

1 ALJ PEREZ-GREEN: Enchanted Rock.

2 MS. HENDREN: Chastity Hendren on behalf of
3 Enchanted Rock.

4 On scope, our concern is that the current
5 framing in the proposed schedule email may
6 unintentionally narrow the issues identified in both the
7 OIR and SB 57. The OIR does more than just direct the
8 Commission to prepare the assessment report on data
9 center costs and potential cost shifts. It expressly
10 identifies the rate design issues for data centers and
11 other large load customers as matters to be considered.
12 The OIR reflects the understanding that you may not be
13 able to limit review to just costs and cost shifts,
14 because to accurately evaluate those questions, you have
15 to examine the factors that determine a large load's
16 actual impact on the electric system, for planning
17 purposes. Today's large load customers have multiple
18 supply options available to them. Those choices can
19 significantly affect infrastructure requirements,
20 procurement needs, and cost allocation outcomes. This
21 now makes rate design no longer an implementation issue
22 to worry about on the back end; it is a key driver in
23 the planning process, and a large load customer's
24 choices among those various options will be
25 substantially influenced by the tariff frameworks

1 available. Without considering those factors, there are
2 real risks of over-procurement and stranded costs.

3 So we request that the scope expressly include
4 consideration of rate design issues, including
5 alternative customer supply arrangements,
6 customer-provided resources, and the relationship
7 between tariff design and large load behavior. Thank
8 you, your Honor.

9 ALJ PEREZ-GREEN: EDF.

10 MR. COLVIN: Michael Colvin for Environmental
11 Defense Fund, your Honor.

12 As we indicated in our response to the Order
13 Instituting Rulemaking, we think that the issues around
14 Senate Bill 57 and data centers are a top priority, and
15 we would encourage the Commission, in terms of schedule,
16 to put that into a separate track, and do it in parallel
17 with the first item that has been identified. We think
18 waiting even another six months, until the first quarter
19 of 2027, is too long for this important issue.

20 EDF doesn't want to object to the
21 categorization, but specifically on the data center
22 issue, we're not yet sure that evidentiary hearings are
23 going to be required, and something that we have seen
24 work well in the past is to direct parties to submit a
25 request for evidentiary hearings by a date certain,

1 otherwise take them off the calendar; so that way, we
2 sort of have some certainty if they are -- that they are
3 needed or not. We might not be able to make that
4 determination until we get into the proceeding a little
5 bit more, but we think that the need for evidentiary
6 hearings for the rest of the proceeding is probably
7 higher than it is for Senate Bill 57 issues, and so we
8 want to acknowledge that the Commission may want to make
9 separate determinations for each track of the
10 proceeding.

11 With that, we have no other concerns about the
12 proposed schedule, and we look forward to active
13 participation.

14 ALJ PEREZ-GREEN: NRDC.

15 MS. KUBIAK: Thank you, your Honor. This is
16 Lauren Kubiak with NRDC.

17 NRDC supports the Commission's efforts to
18 develop and refine electric rates to better facilitate
19 electrification and progress toward meeting our climate
20 goals.

21 Within the proposed schedule shared in advance
22 of this prehearing conference, NRDC offers the following
23 considerations: On the track considering AB 2109
24 implementation, NRDC supports full implementation of AB
25 2109 to remove a structural disadvantage to installing

1 waste heat recovery systems on industrial plants.
2 Within the data center track, NRDC supports establishing
3 a new customer class for data centers and developing a
4 statewide methodology for the direct cost allocation and
5 financing requirements of data centers for electrical
6 infrastructure, including transmission network upgrades.
7 Within the residential rate reform track, we support
8 continuing to evaluate reforms that would improve the
9 equity and cost causality of residential rates, while
10 also supporting electrification. And within the
11 non-residential rate reform track, NRDC supports
12 consideration of equipment-specific industrial rates
13 that reduce the structural operating cost disadvantage
14 for electrification of industrial heat without causing a
15 cost shift. As part of this, barriers and challenges to
16 the adoption of equipment-specific rates for new
17 beneficial electrification loads should be considered.
18 Those considerations should include operational, as well
19 as structural, reforms to how non-marginal electricity
20 costs are collected that don't disincentivize
21 electrification or shift cost to other customers. Thank
22 you.

23 ALJ PEREZ-GREEN: PG&E.

24 MS. WILSON: Thank you, your Honor. Maria
25 Wilson for PG&E.

1 We're hearing a lot of perspectives this
2 morning, and PG&E would like to just note that as we
3 consider changes to rate design it's also important to
4 remember that revenue allocation and rate design is a
5 zero-sum game.

6 Turning now to specific issues, given the
7 emergence of large load growth, which has the potential
8 to benefit all California ratepayers, issues regarding
9 large load customers are the most immediately pressing,
10 and should have first priority in this proceeding. This
11 proceeding can, and should, realize the potential
12 benefits of large load to California.

13 PG&E supports a proceeding schedule that
14 results in rate implementation in 2028 for both of its
15 proposed Track 1A and Track 1B items, as referred to in
16 its comments.

17 The ALJ's communication recognizes that data
18 gathering and assessments on this topic would occur
19 through Q1 2027. PG&E urges that the data gathering and
20 assessments be used to develop a robust record,
21 including for the 2028 ratesetting.

22 Final decision should be issued in 2027,
23 establishing rate design frameworks consistent with the
24 state goals as soon as possible for the Track 1A and
25 Track 1B items in 2028.

1 Speaking on Track 1A, PG&E recommended that it
2 be scoped broadly enough to ensure that costs are
3 appropriately calculated, allocated, and charged to
4 large load customers to result in the creation and
5 implementation of a new large load customer class and
6 related rate schedules and tariffs. This will require
7 that the proceeding establish a large load customer
8 class and eligibility criteria, develop cost-based rate
9 schedules for all rate components, including
10 transmission, which again, would require FERC approval,
11 distribution, PPP, and generation. PG&E seeks
12 implementation of components as soon as practical --
13 practical by an advice letter final -- following a final
14 decision in this proceeding.

15 The scope of this effort must also consider and
16 address potential impacts on existing customers to
17 ensure lower -- load growth is beneficial to all
18 customers. The Commission's adopted scope and schedule
19 should allow for timely evaluation and mitigation of
20 cost impacts, and PG&E believes that a full evidentiary
21 record, including testimony, is necessary due to the
22 complexity of these issues. For example, potential cost
23 shifts to other customers from generation-related
24 procurement could -- should be addressed, so the
25 Commission could consider that emerging large-load

1 customers have the potential in the near-term to
2 increase generation for commodity costs, which could put
3 upward pressure on Commission rates. Because this could
4 have the potential to impact all load-serving entities,
5 this OIR is the appropriate venue to consider both
6 short-term commodity cost impacts and longer-term
7 generation cost implications associated with large load.

8 PG&E also proposes that its Track 1B run in
9 near parallel to Track 1A, and is scoped to address
10 issues ancillary to rate design, but are necessary to
11 prevent other potential impacts on customers, including
12 safeguards for existing customers, requirements for
13 large load customer switching between bundled and
14 community choice aggregation service, and potential
15 revisions to Rule 23 concerning the provider of last
16 resort for these customers.

17 Following the completion of Track 1A and 1B,
18 PG&E also proposes a Track 1C to evaluate and authorize
19 other unique and non-standard rate options.

20 If your Honor -- if I may have one more minute,
21 on the topic of residential-based service charge, to the
22 extent the Commission seeks to make changes to the cost
23 categories, that can be included within the existing BSC
24 structure as currently implemented. PG&E recommends
25 that the Commission address this issue in the Q3 2027

1 PD, and to the extent that the Commission seeks to
2 change the current structure of the BSC -- for example,
3 an additional income tier or the income verification
4 processes -- the Commission take this on at a later
5 date. Thank you very much.

6 ALJ PEREZ-GREEN: PacifiCorp?

7 MR. DALLAS: Yeah. Thank you, your Honor. Joe
8 Dallas on behalf of PacifiCorp.

9 PacifiCorp submitted joint comments with Bear
10 Valley in this proceeding, so I won't echo the comments
11 made by Mr. Gibson, but PacifiCorp supports the comments
12 made by Mr. Gibson, and in particular for the scope of
13 this proceeding to include a consideration for the
14 applicability of small and multi-jurisdictional
15 utilities. Thank you.

16 ALJ PEREZ-GREEN: SDG&E.

17 MS. HANSSON: Thank you, your Honor. Rebecca
18 Hansson on behalf of SDG&E.

19 Thank you for providing the proposed tracks in
20 your email this week. SDG&E agrees that additional
21 clarity and details are needed to flesh out those
22 schedules, with particular attention to building a
23 sufficient record for each track, including testimony,
24 where appropriate, and that the Commission consider more
25 tracks and phases.

1 With respect to the proposed residential rate
2 reform track, and specifically as it relates to the base
3 services charge, SDG&E strongly urges the Commission to
4 commence this track as soon as possible. SDG&E
5 emphasizes, first, that it's important for the
6 Commission to consider expanding the categories of costs
7 eligible for inclusion in the base services charge, and
8 second, that the Commission consider whether an increase
9 to the base services charge or a more variable base
10 services charge is appropriate. The Commission does not
11 need to wait for the evaluation report on the base
12 services charge. Rates are always changing, and things
13 are evolving, and the Commission should not delay
14 necessary changes to the BSC to gain some limited
15 information that is expected to come out of the report.

16 Importantly, I think these issues go to what
17 President Reynolds mentioned in his opening comments
18 here, that there's a risk to the Commission's inaction
19 if it fails to update the level of the base services
20 charge, that the benefits of the base services charge
21 will be eroded if that change -- or that charge, excuse
22 me, is not updated and increased.

23 Further, SDG&E echos PG&E that, to the extent
24 the Commission intends to consider new or changed income
25 verification processes for purposes of the base services

1 charge, that SDG&E hopes the Commission will consider
2 breaking this issue out into its own phase, a Phase 2,
3 of that residential rate track. This issue has already
4 been considered in the Demand Flexibility OIR, and is
5 demonstrated by the working group final report attached
6 to the O -- to this OIR. The issues prove to be
7 extremely difficult, and without any clear consensus
8 proposals. There's plenty that can be accomplished
9 within the framework already adopted. The Commission
10 should not del- -- delay additional progress and rate
11 benefits associated with the rates -- the base services
12 charge.

13 Additionally, another party commented about
14 accelerating the timeline for a decision in the
15 residential rate design track, at least Phase 1 of that
16 track, excluding that income verification issue. The
17 first half of 2027 sounds reasonable to SDG&E, and would
18 improve the base services charge and implementation of
19 rate-deferring benefits resulting from that charge.

20 Finally, SDG&E echos the comments made earlier
21 by Cal Advocates about exclusion of marginal costs from
22 this proceeding. SDG&E addresses this issue in its
23 comments and reply comments, and refers the Commission
24 back to those comments for additional details. Thank
25 you for the time.

1 ALJ PEREZ-GREEN: Sierra Club?

2 MR. VESPA: Thank you, your Honor. Matt Vespa
3 with Sierra Club.

4 Overall, we agree with the tracks that's been
5 proposed here. We do have some comments on the scope
6 and the timing.

7 For data centers, it reads very much like
8 information gathering without additional action, as
9 parties have mentioned earlier. We feel it's very
10 important to also consider a separate weight class for
11 data centers and the right tariff for data centers as
12 part of this. We -- President Reynolds emphasized
13 needed flexibility to adapt to changing conditions, and
14 this is one changing condition that requires action, and
15 so we'd like to see that as part of the scope of this
16 particular track.

17 With regard to residential rate reform, we
18 would support moving certain decisions earlier, in
19 particular, issues around baseline and TOU periods. As
20 I believe Building Decarbonization Coalition referenced,
21 there are actions by air districts right now, for
22 example, to require zero-emission water heating
23 standards, but we still don't have a -- a water heating
24 baseline credit for heat pump water heaters, as an
25 example, that can help facilitate that. And I -- I

1 think the Commission should really think through how its
2 rate design changes and the timing of those can really
3 uplift decarbonization efforts of other agencies, and
4 work in tandem with those, and that's one example that
5 can be done fairly quickly, earlier, within that --
6 within that track.

7 On non-residential rate reform, and also with
8 residential rate reform, just having explicit
9 consideration of ways in which we can adjust rates, you
10 know, obviously bearing in mind any type of cost shift
11 to facilitate electrification. Industrial
12 electrification is critical to reaching our
13 decarbonization goals, but a huge barrier is the cost
14 differential right now between electric heat pump
15 options and gas alternatives, and so ways we could think
16 about reducing the differential as part of that
17 proceeding is very important. Thank you.

18 ALJ PEREZ-GREEN: SBUA?

19 MS. WEBERSKI: Thank you, your Honor. Jennifer
20 Weberski on behalf of SBUA.

21 We appreciate the circulation of the schedule,
22 and we will not reiterate the comments of the other
23 parties, but we firmly believe that a phased track
24 approach is necessary, given the legislative timeline
25 with regard to the data centers. We agree with party

1 comments that that data center issue needs to be
2 expanded to include establishing a rate class for large
3 industrial customers for -- similar to data centers, the
4 tariffs, that that needs to be fleshed out more.

5 Our main concern is that, under the current
6 siloing structure, small business issues and
7 considerations of rate design will not occur until the
8 non-residential, which will take us into 2028, and we
9 are very deeply concerned that small business issues
10 will be lost in the non-residential phase to the larger
11 commercial and industrial customers. Small business
12 customers, with respect to rate design, their
13 affordability issues, their concerns, are much similar
14 to residential customers. So if we are going to go down
15 the phased silo approach of residential versus
16 non-residential, we would ask for consideration of small
17 business issues in the residential phase so that they
18 can be addressed earlier, and we could also address any
19 possible concerns of cost shifting onto small business
20 customers with what is going to proceed out of the other
21 proceedings.

22 We -- we will also -- we do support the idea
23 that in some of the phases we may not need evidentiary
24 hearings. I think, in many of them, we will. So the --
25 the idea to have to file a motion to request evidentiary

1 hearings in some phases, where it's not an
2 across-the-board approach, we agree with.

3 We also think that the idea that we're only
4 going to have five decisions -- we agree with the idea
5 that we're going to probably want to take one larger
6 track, and break it down into smaller phases so that
7 some issues can be addressed sooner than others within
8 those tracks. Thank you.

9 ALJ PEREZ-GREEN: SEIA?

10 MS. ARMSTRONG: Thank you, your Honor. I would
11 echo the concerns about the -- the -- the way that
12 the -- the schedule is laid out in -- in the email.

13 We stated in our reply -- I think our reply
14 comments in the OIR for each of these phases there needs
15 to be a clear delineation of which issues will be
16 addressed, and then a -- a means -- a procedural means
17 to address the -- the issue, as other parties have
18 referred to it as maybe taking a phase, and breaking it
19 down into individual tracks; if not, issues are going to
20 get lost or there's going to be confusion about what
21 parties are supposed to be commenting on. There won't
22 be a clear record. So we would ask that when the
23 scoping memo is -- is drafted that there is a clear
24 listing of issues under each broad phase and how each of
25 those issues will be addressed, what procedural means.

1 And then specifically with respect to the phase
2 on residential rate design, we -- we strongly disagree
3 with SDG&E regarding the Commission's ability to
4 commence making a determination on the change in the
5 base service charge now, and -- and to have a decision
6 on that issue at the beginning of -- of the first part
7 of 2027. In the -- in the decision which the Commission
8 issued on the fixed charge back in May of 2024 it was
9 very clear in its directions that the -- the -- its
10 staff would facilitate the -- the filing of an
11 evaluation in -- report in the proceeding to build the
12 record -- I'm -- I'm quoting -- to build the record for
13 a decision on the next version of the income-graduated
14 fixed charge. The staff cannot even begin that report
15 until one year of metrics is -- have come in. One year
16 metrics won't be completed until March or -- or April of
17 2027, because PG&E implemented its fixed charge later
18 than the other two IOUs. Therefore, there's no way the
19 Commission can issue a decision on changing the base
20 service charge in the first half of 2027. So we -- we
21 ask the Commission to take that into account when its
22 scoping -- in the scoping memo and when it's setting
23 out, excuse me, the schedule for the residential phase.
24 Thank you.]

25 ALJ PEREZ-GREEN: SCE.

1 MR. JERMAN: Thank you, your Honor. Ryan
2 Jerman for SCE.

3 SCE supports the draft schedule. It's
4 ambitious, but we believe it's feasible. To support the
5 feasibility, SCE recommends that the Commission provide
6 further guidance on the scope of the tracks and
7 sequencing of issues within the tracks.

8 Now, we addressed both the scope and sequencing
9 in our filed comments, which we continue to support.
10 I'm not going to repeat our comments here, but I did
11 just want to address two tracks specifically:

12 One on the SB 57 assessment, SCE recommends
13 that the information gathering should focus on actual
14 cost drivers, such as load size, voltage level, load
15 factor, RAMP schedule, customer-specific infrastructure
16 requirements and generation-related costs, which were
17 mentioned by PG&E in their comments here today.

18 And then, second, on the residential rate
19 reform track, SCE recommends that the initial focus of
20 the track be on affordability tools, bill impacts,
21 ESC-related issues, and possible optional rate
22 structures. And this focus could be achieved by setting
23 the scope of early workshops in the track to address
24 these issues. And then, later, workshops could focus on
25 broader issues, such as baseline allowances, seasonal

1 definitions, TOU period redesign, phasing out inclining
2 block rates, and dynamic rate evaluation.

3 Thank you.

4 ALJ PEREZ-GREEN: Tesla.

5 MR. SCHWARTZ: Thank you, your Honor.

6 Andy Schwartz on behalf of Tesla.

7 Tesla has no concerns with the categorization
8 of this proceeding. We also have no comments regarding
9 the schedule and proposed tracks, beyond reiterating our
10 support for including the v-to-g export compensation
11 issue discussed earlier, perhaps addressing those issues
12 as part of the residential rate reform track.

13 Thank you.

14 ALJ PEREZ-GREEN: VGIC.

15 MS. PRATT: Thank you, your Honor. VGIC does
16 not take issue with the tracks and the overall schedule
17 circulated ahead of this PHC. Similar to Tesla, we do
18 suggest that export compensation be taken up earlier in
19 the proceeding, perhaps alongside the residential --
20 alongside or within the residential and non-residential
21 rate design tracks as a sub-track or some other part of
22 a larger phase. We also take no issue with the
23 categorization of this proceeding.

24 Thank you.

25 ALJ PEREZ-GREEN: Wikler Consulting.

1 MR. WIKLER: Thank you, your Honor. Again,
2 Greg Wikler, representing Wikler Consulting, LLC.

3 We support the proposed schedule and
4 categorization of issues as presented thus far. More
5 broadly, we applaud the Commission for taking up the
6 very important topic of advanced electric rate design
7 and rate structures to this proceeding. We believe that
8 it is very important for California to immediately
9 tackle the issue of rate reform in order to realize the
10 enormous potential for advanced technologies covering
11 residential space and water heating, electric vehicles,
12 and industrial processes as a means by which to tackle
13 our state's important decarbonization and flexible
14 demand resource goals.

15 But in order to unlock that potential, we must
16 address the significant barriers that exist under the
17 current antiquated and inequitable rate structures,
18 which impose enormous operating costs and affordability
19 challenges for various consumer classes wishing to
20 implement these new and emerging technologies. We hope
21 this proceeding leads to meaningful rate and regulatory
22 reforms that reduce operating costs and support broader
23 adoption of residential heat pumps through space and
24 water heating, more equitable and widespread electric
25 vehicle charging infrastructures, well-planned and

1 prioritized natural resource treatment for future data
2 centers, and advancements in carbon-free industrial
3 processes without burdening other non-industrial
4 ratepayers.

5 We look forward to contributing our expertise
6 where appropriate as a stakeholder.

7 Thank you, your Honor.

8 ALJ PEREZ-GREEN: Thank you, everyone, for your
9 comments.

10 Because everyone was brief in their responses,
11 I -- oh, I am so sorry. Did I miss -- I believe I'm
12 off our -- working off of the wrong list. Okay.

13 Let's go to TURN, and then we'll hear from
14 UCAN.

15 MS. TORRES: Thank you, your Honor. This is
16 Elise Torres on behalf of TURN. TURN supports the
17 proposed categorization of the proceeding and
18 prioritizing the data center and residential rate reform
19 tracks. Regarding the data center track, the current
20 scope is insufficient and should be expanded to include
21 rate design and cost allocation for data centers,
22 including consideration of the creation of a data center
23 customer class.

24 Regarding the residential rate reform track,
25 TURN supports the proposed schedule and notes that the

1 residential rate design decision should not be pushed
2 later than the proposed Q3 2027 date, in order to get an
3 updated version of the base service charge implemented
4 before 2030. Based on TURN's work on the first version
5 of the base service charge, we assume it will take a
6 while to get that implemented, due to the need for
7 billing system changes at the utilities and marketing
8 and education and outreach activities. If that decision
9 date is going to be pushed back, then the Commission
10 should request the utilities to provide a timeline for
11 how long it will take to implement the base service
12 charge changes and take that into consideration when
13 developing a schedule.

14 TURN also agrees that evidentiary hearings may
15 be needed, at least in these two tracks. And we support
16 other parties' call to schedule them initially, and then
17 request that parties make a formal request for hearings
18 by a certain date just to get them on the schedule,
19 whether we need them or not.

20 Thank you. That's it.

21 ALJ PEREZ-GREEN: Thank you.

22 UCAN?

23 MS. KRIKORIAN: Thank you, your Honor. This is
24 Jane Krikorian from UCAN with just short comments on
25 schedule and scope.

1 Regarding the schedule, UCAN supports the
2 multiple tracks, as the issues are many and complex, and
3 believes parties have provided good ideas on how this
4 should proceed.

5 Regarding scope, UCAN supports Cal Advocates'
6 suggestion on page 5 of the -- their OIR comments about
7 including baseline allowance issues and whether those
8 can be modified to benefit ratepayers. They reference
9 TURN's testimony in A.24-03-019 for additional ideas on
10 this topic. And UCAN believes updating baseline
11 allowances is necessary as California continues on its
12 electrification path and ratepayers use more
13 electricity, in general.

14 Regarding the marginal cost issue, UCAN is
15 unclear about the detail that will be included in this
16 issue right now and whether this should be scoped here
17 or kept to GRC Phase 2 proceedings, as parties have
18 suggested. One thought is to include methodology issues
19 here, which will inform the GRC Phase 2 proceeding.
20 However, UCAN looks forward to reviewing parties' ideas
21 on this issue and further clarification as to what could
22 be included or not.

23 And that's it. Thank you very much.

24 ALJ PEREZ-GREEN: Thank you.

25 Have I missed anyone?

1 (No response.)

2 ALJ PEREZ-GREEN: I'm going to give everyone
3 one more minute. There were some suggestions provided
4 by different parties, and I want to give everybody the
5 opportunity to potentially respond where appropriate.
6 So I'm going to go ahead in the same order as before and
7 begin with Bear Valley and CalPeco.

8 MR. GIBSON: Thank you, your Honor. Jed Gibson
9 for Bear Valley and Liberty Utilities. We are
10 supportive of party recommendations to phase or track
11 the various issues for consideration in this proceeding.
12 We would, I think, further support kind of sub-phasing
13 or sub-tracking certain issues to break out how some of
14 these reforms are going to occur for the large utilities
15 versus the smaller utilities, given some of the
16 significant differences between the larger and smalls.
17 Otherwise, we have nothing further to add.

18 Thank you.

19 ALJ PEREZ-GREEN: Building Decarbonization
20 Coalition.

21 MS. MENTEN: Thank you, your Honor. We have no
22 additional comments.

23 ALJ PEREZ-GREEN: Cal Advocates.

24 MS. AKIYA: Thank you, your Honor. No further
25 comments from us. Thank you.

1 ALJ PEREZ-GREEN: SEJA.

2 MS. LAZEROW: Thank you, your Honor.

3 Shana Lazerow on behalf of CEJA.

4 We -- CEJA agrees with parties that highlighted
5 the need to have the full evaluation of the BSC before
6 concluding a residential check. It's critical to see
7 where we, in fact, are with the measures that
8 statutorily are required to bring down the burdens on
9 low-income customers. Regarding the data center track,
10 it is extremely important that this proceeding not
11 relitigate procurement of resources, like gas and diesel
12 generation, or the question of whether diesel generation
13 can participate in demand response programs. So, those
14 are scoping issues.

15 Also want to circle back to highlight that in
16 the data centers track, we want to be sure to include
17 all of the data centers' related costs so that the --
18 the tariff that -- the rate that comes out of this
19 proceeding adequately does what it needs to do for
20 protecting other customers.

21 And we'll close there. Thank you.

22 ALJ PEREZ-GREEN: CLECA.

23 MS. SHERIFF: Thank you, your Honor.

24 Nora Sheriff for CLECA. I have nothing to add to the
25 comments that we submitted in writing or the comments

1 that were made here at the prehearing conference.

2 Thank you.

3 ALJ PEREZ-GREEN: CalCCA.

4 MR. JOHNSTON: Thank you, your Honor. Kevin
5 Johnston for CalCCA. Just to add support for the
6 comments that were raised regarding the need to wait for
7 the base service charge evaluation, which was also
8 reflected in our opening comments.

9 Thank you.

10 ALJ PEREZ-GREEN: CALSSA.

11 MR. HEAVNER: Brad Heavner with CALSSA. We
12 have no further comments. Thank you.

13 ALJ PEREZ-GREEN: C4AT.

14 MS. KASNITZ: Melissa Kasnitz, Center for
15 Accessible Technology. No further comments.

16 ALJ PEREZ-GREEN: Enchanted Rock?

17 MS. HENDREN: Chasity Hendren for Enchanted
18 Rock. We support separating off the large load issues,
19 potentially into two tracks, one for the SB 57
20 assessment. And the second for large load tariffs and
21 rate design issues.

22 Thank you, your Honor.

23 ALJ PEREZ-GREEN: EDF?

24 MR. COLVIN: Michael Colvin with Environmental
25 Defense Fund. We would like to just offer broad support

1 for the comments offered by CLECA, by Natural Resources
2 Defense Council, and by Sierra Club. And after hearing
3 all the different party comments, something that
4 Ms. Lazerow said at CEJA I think is worth emphasizing,
5 which is the need for very clear marketing, education,
6 and outreach and explanation of the rate designs. And
7 so as we are thinking through each of these individual
8 phases, EDF would encourage the Commission to address
9 how these updates are going to be communicated to
10 customers both in the transition and in the overall
11 offering of what their benefits to them could be from
12 having these new updates, with particular emphasis on
13 using the affordability metrics that the Commission has
14 developed.

15 Beyond that, we thank the Commission for, you
16 know, all the thoughtfulness in this morning's PHC.

17 ALJ PEREZ-GREEN: NRDC.

18 MS. KUBIAK: Thank you, your Honor. Lauren
19 Kubiak with NRDC. Nothing to add at this time.

20 ALJ PEREZ-GREEN: PG&E?

21 MS. WILSON: Thank you, your Honor. Maria
22 Wilson for PG&E. Responding to two comments, one on
23 marginal cost and the other on data centers.

24 PG&E would seek clarity on the marginal cost
25 report and would not recommend it to be a priority in

1 light of the other pressing issues in this proceeding.
2 Each IOU's marginal cost characteristic reflects the
3 IOU's unique cost and customer composition. Although
4 PG&E recognizes the Commission's desire to evaluate
5 marginal costs statewide, marginal costs are best
6 addressed in GRC Phase 1s, which are -- 2s -- excuse
7 me -- which are facilities -- utility specific. And to
8 the extent that the Commission provides additional
9 guidance, PG&E would recommend submittal in Q3 of that
10 report, given the Q1 2028 proposed decision timeline.

11 On data center specific generation, this
12 proceeding can also explore generation arrangements,
13 such as bring your own generation arrangements,
14 including how these arrangements can align with the
15 Commission's planning and compliance processes, like RA,
16 resource adequacy or renewable support portfolio
17 standard to avoid duplicative procurement. Novel cost
18 recovery mechanisms attributed to large load customers
19 should strive to seamlessly fit with other existing cost
20 recovery mechanisms for other large -- non-large-load
21 customers.

22 Thank you very much.

23 ALJ PEREZ-GREEN: PacifiCorp.

24 MR. DALLAS: Yeah. Thank you. Joe Dallas on
25 behalf of PacifiCorp. And we have no additional

1 comments. Thank you.

2 ALJ PEREZ-GREEN: SDG&E.

3 MS. HANSSON: Rebecca Hansson on behalf of
4 SDG&E. SDG&E, I think, notes really, I guess, that it
5 just supports PG&E's additional comments on marginal
6 cost issues and the potential delay of that joint
7 report, as well as clarification as to what that would
8 include. I think se- -- the amount of details on that
9 particular phase or track of the proceeding would be
10 helpful, to the extent that it's not excluded.

11 Thank you, your Honor.

12 ALJ PEREZ-GREEN: SDG&E.

13 (No response.)

14 ALJ PEREZ-GREEN: SDG&E?

15 (No response.)

16 ALJ PEREZ-GREEN: My apologies, we have Sierra
17 Club.

18 MR. VESPA: Thank you, your Honor.

19 Just to respond to something PG&E just said
20 about bringing your own generation for data centers. I
21 just want to flag this raises a lot of significant
22 concerns, depending on what you're bringing. Is it
23 diesel backup? Is it running off fossil fuels?
24 Particularly, for this large load, that could have very
25 serious implications on air quality and our climate

1 goals. So I would encourage us -- I think it's -- it
2 raises a lot. It may complicate the proceeding. If it
3 does get brought in, those are very serious issues that
4 need to get brought in with it. Thank you.

5 ALJ PEREZ-GREEN: SBUA.

6 MS. WEBERSKI: Thank you, your Honor. We have
7 no further questions -- or no further comment at this
8 time.

9 ALJ PEREZ-GREEN: SEIA.

10 MS. ARMSTRONG: Thank you, Jeanne Armstrong for
11 SEIA. Just one additional comment I forgot to raise
12 earlier. We do support CALSSA in its suggestion to
13 expand the scope of the departing load issue, especially
14 for departing load charges being assessed on non-export
15 generation. It's -- the departing load charge is --
16 well, it was established a long time ago to fit other,
17 sort of, departing load. It wasn't intended to be --
18 non-export generation wasn't even in existence, really,
19 when the departing load charge setup was adopted by the
20 Commission. So having to re-look at that, with respect
21 to these non-export generators, is something that we
22 really should include in the scope.

23 ALJ PEREZ-GREEN: SCE.

24 MR. JERMAN: Thank you, your Honor.

25 Ryan Jerman for SCE.

1 And I just wanted to echo comments that
2 affordability-related residential issues, such as
3 optional rates to support affordability, should be
4 accelerated within the residential track.
5 Affordability-related issues can be focused on early in
6 the workshops that will be held in that track. But also
7 to the extent that issues are resolved regarding
8 affordability, the Commission should issue early orders
9 in the residential track addressing the affordability
10 issues. Thank you.

11 ALJ PEREZ-GREEN: Tesla.

12 MR. SCHWARTZ: Thank you, your Honor. Andy
13 Schwartz with Tesla. No further comments at this time.

14 ALJ PEREZ-GREEN: TURN.

15 MS. TORRES: Thank you, your Honor. TURN has
16 no further comments at this time.

17 ALJ PEREZ-GREEN: UCAN.

18 MS. KRIKORIAN: Thank you, your Honor. Jane
19 Krikorian for UCAN. We have no further comments.

20 ALJ PEREZ-GREEN: VGIC.

21 MS. PRATT: Thank you, your Honor. Grace Pratt
22 for VGIC. We have no further comments at this time.
23 Thank you.

24 ALJ PEREZ-GREEN: Wikler Consulting.

25 MR. WIKLER: Thank you, your Honor. Greg

1 Wikler with Wikler Consulting. We have no further
2 comments at this time. Thank you.

3 ALJ PEREZ-GREEN: Thank you, all, for your
4 participation. And thank you to the court reporter.

5 We are adjourned.

6 (At the hour of 10:52 a.m., this matter
7 having been concluded, the Commission then
8 adjourned.)]

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

I, KARLY POWERS, CERTIFIED SHORTHAND REPORTER
NO. 13991, IN AND FOR THE STATE OF CALIFORNIA DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
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TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON JUNE 18, 2026.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.

EXECUTED THIS JUNE 24, 2026.



KARLY POWERS
CSR NO.#13991

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

I, REBEKAH L. DE ROSA, CERTIFIED SHORTHAND
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DO HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON JUNE 18, 2026.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
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EXECUTED THIS JUNE 24, 2026.



REBEKAH L. DE ROSA
CSR NO. 8708

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