

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA



FILED

06/23/26

01:41 PM

R2409012

Order Instituting Rulemaking to
Establish Policies, Processes, and
Rules to Ensure Safe and Reliable Gas
Systems in California and Perform
Long-Term Gas System Planning

Rulemaking 24-09-012
(Filed October 2, 2024)

**CENTER FOR ACCESSIBLE TECHNOLOGY'S REPLY COMMENTS ON PROPOSED
DECISION ESTABLISHING APPLICATION PROCESS FOR SB 1221
NEIGHBORHOOD DECARBONIZATION PILOT PROGRAM**

Melissa W. Kasnitz
Center for Accessible Technology
3075 Adeline Street, Suite 220
Berkeley, CA 94703
Phone: (510) 841-3224
Fax: (510) 841-7936
E-mail: service@c4at.org

June 23, 2026

Table of Contents

I.	Introduction.....	1
II.	Discussion.....	1
A.	Outreach and Engagement.....	1
B.	Guidance re: Non-Consenting Participants.....	2
C.	Application Process.....	2
III.	Conclusion.....	3

I. INTRODUCTION

In accordance with Rule 14.3 of the Commission’s Rules of Practice and Procedure, Center for Accessible Technology (CforAT) files these timely reply comments addressing the Proposed Decision establishing an application process for pilot programs establishing neighborhood decarbonization zones, as authorized under SB 1221 (the Pilot Application PD).

II. DISCUSSION

A. Outreach and Engagement

Sierra Club and NRDC recommend that the Commission revise the PD to ensure more direct input by electric utilities, CBOs, and other relevant stakeholders in the development of outreach strategies and materials to support pilot proposals.¹ Their concern focuses on the current outreach structure which primarily gives responsibility for outreach to the gas utilities. UCAN similarly expresses concern about the level of control over outreach efforts that the PD would give to the gas utilities.² UCAN also opposes giving gas utilities the authority to direct funds to CBOs other than CCAs.³

CforAT shares these stakeholders’ concerns about allowing gas utilities to control outreach about a pilot project whose purpose is to remove customers from the natural gas system. In opening comments, our focus was on the content, delivery method and timing of outreach efforts,⁴ and also the need to ensure that appropriate CBOs are identified and that their outreach efforts are compensated.⁵ We agree with Sierra Club/NRDC and UCAN that this effort should not be left to the discretion of the gas utilities. We also continue to believe that effective, funded

¹ Sierra Club/NRDC Comments at pp. 9-11.

² UCAN Comments at pp; 2-3.

³ UCAN Comments at p. 3.

⁴ CforAT Comments at pp. 1-4.

⁵ CforAT Comments at pp. 4-5.

work by CBOs and local messengers, using in-language and accessible communications, can increase project participation.⁶

B. Guidance re: Non-Consenting Participants

A number of parties raise questions about how pilot implementation will respond to non-consenting participants. CforAT agrees that more guidance on this issue is needed. While we fundamentally disagree with SoCalGas’s suggestion that one option for such customers would be to allow them to remain on the gas system,⁷ it is true that authorization to remove customers from gas service without their direct consent is potentially fraught and risks backlash, jeopardizing the goals of the pilot.

While it is unlikely that the Commission can incorporate detailed guidance into the Pilot Application PD at this time, CforAT recommends that the Commission provide stakeholders with information on how it plans to develop appropriate guidance before implementation of any neighborhood decarbonization zone pilots begins. CforAT supports the recommendation of the Building Decarbonization Coalition that the Commission set workshops to address this issue.⁸

C. Application Process

In considering whether to authorize proposed pilot projects through an application process or an advice letter process, the PD correctly concludes that an application process “will allow both the Commission and stakeholders to closely review the project proposals, increasing the transparency and rigor of evaluation.”⁹ CforAT respects the concerns set out by parties such

⁶ See Building Decarbonization Coalition Comments at pp. 10-11.

⁷ See Joint Utilities Comments at p. 10. This suggestion is directly counter to the provision of SB 1221 which authorizes a gas corporation to cease providing service in an area where a pilot has been implemented. This authorization is codified at Section 451.9(a) of the California Public Utilities Code.

⁸ Building Decarbonization Coalition Comments at p. 10.

⁹ Pilot Application PD at p. 16.

as Sierra Club/NRDC that the application process can take time.¹⁰ Nevertheless, the anticipated pilots will represent a dramatic change in customer expectations and energy delivery. The pilots are intended to provide information and hopefully a roadmap to expanded efforts to advance electrification and reduce reliance on natural gas. If they are not done with care, and with substantial effort to ensure public understanding and support, the pilots risk hampering the very goals they are intended to advance. Moreover, the opportunities for input and transparency in the advice letter process remain well below that available through the application process.

CforAT supports use of the application process.

III. CONCLUSION

CforAT supports adoption of the Pilot Application PD subject to the recommendations, modifications and clarifications discussed in opening comments and above.

Respectfully submitted,
June 18, 2026

/s/ Melissa W. Kasnitz
MELISSA W. KASNITZ

Center for Accessible Technology
3075 Adeline Street, Suite 220
Berkeley, CA 94703
Phone: 510-841-3224
Fax: 510-841-7936
Email: service@c4at.org

¹⁰ See Sierra Club/NRDC Comments at pp. 3-6.