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BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Modernize the Electric Grid for a High Distributed Energy Resources Future.	Rulemaking 21-06-017

OPENING COMMENTS OF ADVANCED ENERGY UNITED ON THE ASSIGNED COMMISSIONER'S AND ADMINISTRATIVE LAW JUDGE'S RULING ISSUING QUESTIONS ON THE DISTRIBUTED ENERGY RESOURCES ORCHESTRATION WORKSHOP REPORTS

I. Introduction and Summary of Position

Pursuant to the Assigned Commissioner's and Administrative Law Judge's Ruling Issuing Questions on the DER Orchestration Workshop Reports, issued July 9, 2026 ("Ruling"), Advanced Energy United ("United") submits these comments on the two Track 2 DER Orchestration workshop reports and the questions set forth in the Ruling.

United continues to have concern that it is premature to order utility applications to implement DER Orchestration prior to establishing bedrock, foundation principles, policies, and platforms to support an open-access Orchestration framework. We are more hopeful after the workshops discussed in these comments, however, that further work can be done on these common foundational elements prior to and

following a Commission Decision in Track 2 that could make Applications appropriate after a focused working group process discussed below.

Specifically, United recommends the Commission require the following six threshold parameters be established before, or as a condition of, authorizing IOU DER orchestration applications to proceed:

1. **Common, published technical and data standards, developed with device- and standards-readiness in mind.**

   The Commission should establish common interoperability standards across all IOU platforms before any application is approved. By common standards, we do not suggest a single protocol be mandated across all technologies, customers, and use cases. Rather we suggest that different protocols be established at appropriate scales (for instance IEEE 2030.5 may be appropriate for larger customers and aggregations, but not for individual smaller devices). But the acceptable protocols should be common and established across utilities.

2. **A single, statewide (or fully harmonized cross-IOU) data hub, DER registry, and flexibility-market platform, with vendor-neutral governance.**

   United strongly supports moving to technical and governance scoping for common platforms to support open access to orchestration. United has primarily focused on customer energy data access platforms – as have been or are being implemented in multiple jurisdictions currently – but we also recognize and support scoping cost and capability for other flexibility platforms as well.

   The three-part structural solution Utility Consumers Action Network (UCAN) presented at Workshop 1 (a statewide DER registry providing common visibility to DSOs, CAISO, and aggregators; a statewide data hub functioning as a single, certified API layer for customer usage, DER, and grid data shared among DSOs, CCAs, energy service providers, aggregators, and CAISO; and a statewide flexibility market platform through which DSOs and load-serving entities procure services from DERs and aggregators on transparent terms) captures the range of potential enabling platforms. These components should be governed by a multi-stakeholder body, not administered unilaterally by the hosting IOU.

3. **Non-discriminatory registration, telemetry, and dispatch access, defined using United's six-part open-access test.**

   United's April 20 comments proposed a working definition of open access, drawn from FERC and Commission precedent, consisting of:

1. non-discrimination,
2. comparability (no utility self-preference),
3. third-party access to grid infrastructure,
4. tariff-based standardized terms,
5. support for competition, and
6. transparent and timely data and processes.

United recommends the Commission adopt that six-part test as the operative definition of "open access" in any DER orchestration framework decision, and require that third-party aggregators, OEMs, and technical service providers be able to register resources, receive dispatch signals, and be compensated on the same timelines, through the same interfaces, and under the same eligibility criteria as any utility-run or utility-affiliated program, with no preferential queueing, data access, or settlement treatment for utility programs. This is consistent with SDG&E's own stated position at Workshop 1 that any qualified provider should be able to compete.

United also continues to support California Community Choice Association's (CalCCA) suggestion, raised at Workshop 1, that the Commission evaluate an independent flexibility marketplace operator model as an alternative to assuming the IOU itself must run the platform its own competitors depend on. Alternatively, the Commission may also consider requiring the separation of utility DER aggregation program functions and personnel from the DSO operations staff as one specific mitigation. If an IOU is going to operate the registry, dispatch platform, and settlement system, the personnel and functions administering that platform should be organizationally separated, with a strict, auditable code of conduct and information barrier, from the personnel and functions running any competing IOU-affiliated DER program.

The Commission need not make a direction regarding specific open access mitigations in its Track 2 Decision, but may instead establish the six-part test described here and require the working group suggested later here to explore options, and require utilities to adopt the most protective and cost-effective solutions in their Applications.

4. **Transparent, cost-based tariffs for platform access.**

United is not opposed to user fees as part of cost allocation for a data access platform, or other platforms. We suggest cost allocation be addressed in a scoping phase, in which a cost effectiveness and allocation methodology could be proposed. We recommend any fees charged to

third parties for registry, telemetry, or dispatch platform access must be publicly filed, cost-based, and subject to Commission review.

5. **Data access and portability for customers and their authorized third parties.**

   Customers must be able to direct the sharing of their own DER performance and telemetry data to any qualified third party of their choosing, and that performance history should be portable if a customer switches aggregators, preventing data from being used to lock customers into a single provider.

6. **Phased but expeditious, milestone-based rollout tied to demonstrated compliance, not simply to elapsed time.**

   Authorization to proceed from one implementation phase to the next should be conditioned on the IOU demonstrating compliance with the open-access parameters above rather than on the passage of time alone. United notes that the wide range of timelines proposed in the Workshop 1 record, from PG&E's multi-year sandbox-piloting-scaling sequence extending past 2030 to UCAN's proposed fifteen-to-eighteen-month procure-and-activate pathway, underscores why milestone-based, compliance-driven gating is preferable to a fixed calendar that either moves too slowly or outpaces the guardrails described here. We do note significant urgency however, as the scale of both electrical system needs (in infrastructure, capacity, and energy) and the supply of flexible devices (gigawatts of BTM batteries and EVs) are both growing rapidly, with only the market and regulatory structures standing as barriers to engaging these resources.

The March 23 ACR proposed ten guiding principles to shape the IOUs' eventual applications, including "Open access and Interoperability," "Transparent participation pathways and compensation," and "Preventing double compensation," and asked whether the Commission should adopt, modify, or add to that list. United's April 20 comments proposed adding two further principles: scale of DER participation commensurate with the maximum cost-effective potential of the resource, and promotion of competition and liquidity in the market for DER grid services. United also cautioned that the proposed principles, as listed, were not yet structured as enforceable principles and would need further development through a stakeholder process to avoid ambiguity. The California Independent System Operator's April 20 comments on the same Ruling separately urged the Commission to add "Reliable" as a principle.

United continues to support all three additions, and the six threshold parameters above are United's attempt to give the Open Access and Interoperability principles the specific, enforceable content that United argued in April was still missing.

The responses below apply these threshold parameters to the specific questions posed in the Ruling.

II. Responses to Questions

Question 1. ***Are there any factual inconsistencies or areas needing clarification in the summary workshop reports set out in Attachments 1 and 2? Are the party perspectives discussed in the respective reports accurate?***

United has reviewed both reports closely and identifies no material factual inconsistencies in their summaries of party presentations.

Question 2. ***What additional information or development on a proposed orchestration framework should be considered before directing the IOUs to file DER orchestration framework applications? What recommendations do parties have regarding additional work needed and timelines, including timing for filing of IOU DER orchestration applications?***

As explained in Section I, United's April 30 reply comments concluded that the Commission should not require separate IOU applications at this time, and should instead focus Track 2 on defining fundamental and consistent framework elements through working groups, stakeholder proposals, and IOU reports, with near-term implementation proceeding through existing venues such as the Distribution Planning Process, the Demand Response rulemaking, and advice letters.

However, through the workshops and other Rulings and comments in this record (notably the July 7 ACR/ALJ Ruling Requesting Comment on Flexible Service Connections) United and our members have taken a more favorable view of authorizing utility DER Orchestration Applications – provided that the foundational and common principles, platforms, and protocols we have consistently advocated for are adopted prior to those applications being filed.

United recommends the Commission convert the workshop process into a formal working group, as United proposed in April, with a defined charter and output deadline of approximately four to six months, tasked with resolving the six threshold parameters in Section I and the cost-effectiveness methodology discussed in Question 17 below. United recommends the Commission then adopt those parameters and that methodology in a binding ruling or decision, and only then set an application filing window, of approximately six months, so that IOUs design compliant proposals once rather than each filing before the ground rules exist.

Question 3. ***Given the time required to prepare and decide on potential IOU DER orchestration applications and the related IOU pilots currently underway, how can IOUs (a) ensure DER orchestration strategies incorporate lessons learned from ongoing pilots and the record of this proceeding, and (b) coordinate the pilots with the formal DER orchestration application proceeding?***

United recommends that each IOU be required to file a pilot-learnings appendix with its application that expressly maps results from ongoing pilots to the specific program design choices proposed in the application, including any instances where pilot results changed the utility's approach. To coordinate pilots with the formal proceeding, United recommends that any pilot continuing after a Commission ruling adopting the threshold parameters in Section I be required to operate consistent with those parameters going forward (e.g., open registration, non-discriminatory data access) so that pilots do not become de facto closed systems that third parties must later be retrofitted into, or that create sunk-cost pressure toward a particular vendor or architecture before the Commission has weighed in.

Question 4. ***What, if any, specific pre-application steps and activities related to DER orchestration, such as convening workshops or a working group process, should be completed prior to the IOUs filing of DER orchestration applications?***

United strongly recommends the Commission convene a structured technical working group (not merely additional workshops) facilitated by Energy Division, an outside contractor or institution – with a defined charter and output deadline of four to six months. Unlike the Workshop 1 and Workshop 2 discussions, which were valuable for surfacing perspectives, a working group with a mandate to draft specific requirements is needed to actually produce the common standards, platform scoping, cost frameworks, and open access protections described in Section I.

United's April 20 comments identified at least four other proceedings already addressing overlapping issues, including standardized data systems and communications protocols in the Demand Response rulemaking (R.25-09-004), DER communications and interoperability in the Distribution Interconnection Rules rulemaking (R.25-08-004), data-infrastructure standardization recommendations from the Data Working Group in R.22-11-013, and the CEC's rulemaking to improve the Load Management Standards. The working group should borrow from or coordinate with, rather than duplicate, that work.

Question 5. ***If convening a working group or workshops is warranted, what should be the explicit objectives and key topics to address?***

United recommends the working group be charged with producing concrete work products on: (1) interoperability and communication standards and their applicability (2) open access principles,

safeguards and mitigations (3) data access, DER Registry, and flexibility marketplace scoping (esp. functionality and cost) (4) a cost effectiveness and allocation methodology distinguishing ratepayer-funded infrastructure from platform-user fees. Each topic should produce a specific, reviewable draft requirement, not just a discussion summary.

Question 6. ***Parties provided recommendations on regulatory pathways. Please provide feedback on the recommended regulatory pathways or provide alternative proposals.***

Parties discussed regulatory pathways in the workshops, as well as in comments and reply to the March 23 ACR. These views range from ordering the implementation of an independent DSO model, to rejecting the proposal for IOU Applications, to authorizing 5-10 year sandboxed exploration for the utilities.

CalCCA argued the Ruling wrongly assumes IOU-led orchestration is the only DSO model that has been adequately considered, suggesting an independent DSO could still be explored. Cal Advocates argued the process moves to applications too quickly, before the Commission has provided guidance detailed enough for IOUs to apply a consistent framework. SDG&E endorsed a conceptual distinction United also finds useful: an overarching DER Orchestration Framework decision, which should set guiding principles, core design elements, and the procedural pathway, is a different thing from review of a utility-specific application to operationalize that framework, and utilities can be held to a common readiness framework while still proposing implementation pathways suited to their own system conditions. CalSSA, by contrast, warned that overemphasizing "framework" risks keeping DER orchestration theoretical rather than moving to actual programs, and urged the Commission to identify target locations and get cost-effective non-wires alternatives underway quickly.

United's own pathway recommendation tries to reconcile these views. We recommend the Commission direct a working group to develop the topics described in Question 5 above, use the output of that working group process to adopt a Commission framework decision that fixes the six open access principles and six threshold parameters in Section I, and only then authorize applications to operationalize utility-specific implementation. United is not persuaded that framework development requires the multi-year delay CalSSA is concerned about; a four-to-six month working group, as United proposed in April, is intended to move quickly precisely so that near-term implementation is not held up.

Question 7. ***Of the six key discussion topic areas identified during Workshop 1 for developing a DER orchestration framework, which topics or subtopics are best suited for development through stakeholder working groups or future workshops?***

The Workshop 1 report itself demonstrates why Topics 2 and 3 need statewide working-group resolution rather than utility-by-utility development. On Topic 2 (Open, Interoperable Communications), CalCCA warned that utility-centric ADMS/DERMS architectures were not designed for market administration and that mandating IEEE 2030.5 could raise participation costs, while SDG&E opposed mandating any single protocol. Reconciling these positions utility by utility would produce exactly the fragmented, three-times-integration outcome United has warned against.

On Topic 3 (Dispatch Mechanisms and Aggregator Roles), PG&E, SCE, and SDG&E each proposed different utility-anchored models while CalCCA urged evaluation of independent marketplace operators and Universal Devices proposed splitting aggregation from device execution. This range of structural approaches should be narrowed to a common model before, not after, applications are filed.

Topic 4 (Cost-Benefit Methodologies) needs a common statewide methodology, a point on which PG&E, SDG&E, Cal Advocates, and Clean Coalition were notably aligned in identifying this as a foundational, unresolved prerequisite.

Topic 1 (Grid Services and Use Cases) and Topic 6 (IOU Readiness and Scalability) are more naturally utility- and territory-specific and can be addressed within individual applications, provided they are built on the common standards adopted through the working group process.

Question 8. ***How should the Commission and/or IOUs ensure engagement with California Tribal Nations, environmental social justice communities, and other communities that may be impacted by implementation of the DER orchestration framework that may not be tracking the current proceeding, or have capacity to engage on the highly technical aspects of the proceeding?***

United recommends the Commission require each IOU application to include a dedicated Tribal and environmental-and-social-justice (ESJ) engagement plan. United recommends Commission-led and/or contractor-run (rather than solely utility-led) outreach sessions to preserve independence and credibility, and recommends that each application include measurable participation and benefit-distribution metrics for disadvantaged and Tribal communities, reported on an ongoing basis after program launch.

Question 9. ***Regarding PG&E's Workshop 1 presentation, when implementing the primary use cases described under Key Topic #1 (system peak reduction, speed to power, and resource-efficient grid investments), are these the correct use cases to implement? If so, which use cases should be implemented first, and which should be implemented in parallel or sequentially?***

United agrees these are appropriate near-term use cases because each has a reasonably clear ratepayer benefit and measurable performance metric, and they overlap substantially with use cases SCE and SDG&E separately identified, including SCE's flexible service connections and service-panel-upgrade avoidance, and SDG&E's thermal overload mitigation and voltage support.

United recommends system peak reduction be prioritized first, since it can build on existing demand-response infrastructure and established avoided-cost methodologies. Speed-to-power should be pursued in parallel rather than sequentially, given the urgency of California's interconnection queue backlog and its direct relevance to enabling third-party developers and OEMs to bring projects online faster. Additionally the Commission and utilities have and continue to have impressive success in putting forward flexible service connection models that are a powerful tool to implement this goal alongside DER orchestration.

Resource-efficient grid investments (non-wires alternatives) should follow closely behind, since it depends on the more granular, locational forecasting capability the CAISO and SDG&E described at Workshop 2 and the circuit-level flexibility modeling addressed in Question 14 below. Sequencing it last should not become an excuse to delay it indefinitely once that forecasting capability exists.

Question 10. ***How should the Commission coordinate DER orchestration implementation for IOUs in different stages of technical readiness with regards to telemetry, DER management systems, and other DER orchestration aspects?***

United recommends the Commission adopt a common readiness rubric that all three IOUs are assessed against, with utility-specific implementation timelines but common minimum standards that do not vary by utility. The Workshop 1 record already shows meaningfully different starting points and philosophies: PG&E proposed a sandbox phase feeding a multi-year piloting-to-scaling sequence; SCE proposed a phased 2026-2033 roadmap built around ADMS/DERMS maturation and AMI 2.0 deployment; and SDG&E argued against any mandated implementation timeline at all, preferring to proceed only when capabilities and demonstrated ratepayer benefits justify it. United recommends the Commission avoid two distinct dangers in timelines: allowing the least-ready utility's pace, or SDG&E's preference for no mandated timeline, to become the de facto ceiling for adopting common open-access standards statewide; and allowing the most-ready utility to bypass third-party access requirements in the name of speed. Readiness differences should affect the pace of rollout, not the substance of the access and interoperability rules third parties can rely on.

Question 11. ***How can current AMI 1.0 and next-generation AMI 2.0 Grid Edge DERMs capabilities support IOU-led DSO DER orchestration programs?***

AMI 1.0 provides limited support: it generally cannot disaggregate DER output from total load and lacks the resolution needed for real-time dispatch verification, as SDG&E's presentation at Workshop 2 illustrated. AMI 2.0 and Grid Edge DERMS should enable higher-resolution, more granular visibility that can support more sophisticated dispatch and settlement, and these technologies can mitigate or avoid the cost, complexity, and latency of Enterprise DERMS integrations. United emphasizes however that Grid Edge DERMS is not dependent on AMI 2.0 rollout – numerous third-party aggregators and Grid Edge DERMS providers can provide the locationally-specific visibility and dispatchability, integrated cloud-to-cloud into Enterprise DERMS, necessary to achieve Orchestration. However this potential will only translate into third-party market access – and all of the capacity, customers, and innovation third parties bring – if it is paired with open interfaces, as addressed in the two sub-questions below.

Question 11a. ***What additional communications or technical capabilities are necessary to enable reliable dispatch and settlement of DERs via Grid Edge DERMS?***

United recommends the Commission establish common interoperability standards appropriate to the scale, customer type, and use case of the device or edge-controller level. For instance, it is not necessary to prescribe communication protocols for all DER devices if sufficient aggregator or Grid Edge DERMS integrations exist to bring these devices into Enterprise DERMS orchestration. We also recommend common cybersecurity certification process for edge devices from any qualified OEM, aggregator, or Grid Edge DERMS provider, not just utility-approved vendors; and open, published APIs that allow third-party dispatch signals and performance data to flow to and from the Grid Edge DERMS layer on the same basis as utility-program signals.

Question 11b. ***What are the differences in capabilities, advantages, and disadvantages of Grid Edge DERMS compared to centralized Enterprise DERMS for enabling IOU-led DSO DER orchestration?***

Grid Edge DERMS offer faster, localized response for real-time voltage and thermal management and can reduce telemetry backhaul requirements, but carry risk of vendor fragmentation and reduced visibility to CAISO and third-party aggregators if edge platforms are proprietary. On the other hand, Enterprise DERMS offer centralized visibility and are generally easier to integrate with a common registry and third-party access layer, but integration may be prohibitively expensive for many use cases, and introduce latency and single-point-of-failure considerations.

United suggests that in many cases a hybrid architecture may be appropriate in which Enterprise DERMS serves as the system of record for registry and settlement purposes while Grid Edge DERMS handles

local real-time control — with both layers required to expose data through the common standards described in Section I, so third parties are not foreclosed from either layer.

Question 12. ***What customer-owned DER technologies (e.g., EVs, smart thermostats, water heaters, batteries, other flexible loads) are currently capable of and/or best fits for participating in IOU-led DSO DER orchestration programs to provide value to ratepayers?***

All of these devices, and more (for just one example, battery-integrated AC/heat pumps and induction stoves), are capable of participating, and should be considered.

Question 13. ***What requirements should be established to enable reliable integration of customer-owned DERs into IOU DER orchestration programs?***

United recommends the Commission require: common (across utilities) telemetry and communication standards for participating devices, aggregators, or Grid Edge DERMS providers appropriate to the use case; a common aggregator certification and registration process; a standardized measurement and verification (M&V) methodology for performance and compensation; and clearly defined curtailment, compensation, and liability rules that apply consistently regardless of which entity — utility program or independent aggregator — enrolled the resource.

Question 13a. ***How should IOUs account for customer behavior and resource availability when determining the dependability of orchestrated DERs on the distribution grid?***

This question reveals one of the many arguments for robust third party participation. Ensuring that the diversity of technologies, individual customer behavior, and resource availability still results in reliable, dependable, predictable aggregation performance is one of the *raison d'etre* of aggregators. It is their secret sauce. If utilities directly run programs, acting as aggregators themselves, they should be held to the same high performance standards as third party aggregators. The Commission should not dictate how they handle this complex challenge – nor should the Commission bail them out if they fail to perform as well as third party aggregators.

Regardless, the Commission should ensure a level playing field and equal access to third parties, and judge utility and third party aggregators on their performance.

Question 14. ***How should circuit-level demand flexibility be modeled by IOU DSOs to better inform how distribution planning investments should be allocated in future planning cycles?***

United recommends that circuit- and feeder-level flexibility be incorporated into the annual Distribution Planning and Electrification Process (DPEP) using locational net-load forecasts, building on the forecasting and data-sharing concepts the CAISO and SDG&E discussed at Workshop 2, and that these forecasts incorporate enrollment data from third-party programs (with customer consent) rather than reflecting only utility-run pilots.

United recommends the Commission require IOUs to publish circuit-level flexibility potential maps, analogous to existing integration capacity analysis (ICA) maps, so that third-party developers and aggregators can use the same planning-grade information the utility uses to target investment and program design.

Question 15. ***What, if any, learnings from PG&E's EPIC 4.08 pilot and its ongoing development can be used to model load flexibility into the annual Distribution Planning and Electrification Process (DPEP) and how would that be accomplished?***

United has not reviewed the EPIC 4.08 pilot.

Question 16. ***The DSO ensures that the system is operated in a safe, reliable manner and is responsible for optimizing system performance. What components are needed for a DER orchestration framework that will ensure these operations continue while also allowing for the flexibility needed to manage load that incorporates a high level of DERs?***

United recommends five components: (1) locational hosting-capacity or flexibility "envelopes," similar to the approach Piclo described from the United Kingdom, that define the operating boundaries within which DER dispatch can occur without distribution-system risk; (2) real-time or near-real-time telemetry validation paired with transparent, published curtailment criteria and automatic curtailment authority where safety requires it; (3) a common data model and registry serving as the authoritative system of record; (4) technology- and provider-neutral dispatch priority rules, so that curtailment or dispatch sequencing decisions are not a mechanism for favoring utility-affiliated resources; and (5) an audit trail and dispute resolution process so that DSO safety and reliability actions remain subject to independent review.

Question 17. ***The IOUs have previously made statements regarding opportunities for lowering costs. Please provide explicit examples of these opportunities including how these opportunities may shift between initial implementation and further scaling.***

United's April 30 reply comments took a position on cost-effectiveness methodology that bears directly on this question: United argued that evaluating DER orchestration constraint-by-constraint and then approving bespoke, one-off solutions (the approach previously used in the Distribution Investment Deferral Framework) is an outdated and discredited model, and that systemic, portfolio-level evaluation tends to outperform case-by-case evaluation because it captures interactions, timing, and shared value streams that siloed analyses miss.

The primary near-term ratepayer benefits from DER orchestration will likely mirror the primary benefits to date of load flexibility: system (or local) peak load reduction and higher average capacity utilization.

For distribution-infrastructure focused DER Orchestration, initial cost-lowering opportunities still come primarily from the utility side: deferred or avoided traditional infrastructure investment through non-wires alternatives, and reduced reliance on higher-cost operational interventions, both of which SCE and SDG&E described at Workshop 2.

Question 18. ***Are there any other relevant issues not discussed in the March 23 Assigned Commissioner's Ruling, but brought up in the workshops that the Commission should consider for the DER orchestration application process?***

United recommends the Commission also address, either in the pre-application working group or in the application review itself: (1) a cybersecurity and customer-data-privacy baseline specifically for third-party platform access, which was not addressed in the March 23 Ruling's five priority areas; (2) explicit non-discrimination and affiliate-transparency rules preventing IOU-affiliated or IOU-preferred programs from receiving faster registration, interconnection, or settlement treatment than independent aggregators; (3) published service-level standards (e.g., platform uptime, dispatch signal latency) for orchestration platforms; (4) a cost allocation methodology, decided before applications are filed, distinguishing ratepayer-funded infrastructure costs from platform-user fees, so that this does not become a point of dispute when platforms are proposed; (5) ongoing Commission tracking and public reporting of third-party market participation metrics, including the number of independent aggregators registered and megawatts enrolled by provider type, so that the open-access commitments described in these comments can be verified in practice; and (6) resolution of the double-recovery question Cal Advocates raised at Workshop 1, namely whether IOUs have already begun recovering DER orchestration-related costs through General Rate Case grid-modernization components, which should be reconciled before any new orchestration-specific cost recovery mechanism is authorized.

IV. Conclusion

United appreciates the Commission's continued efforts to develop a robust DER orchestration framework and looks forward to working with the Commission, the CAISO, the IOUs, and other stakeholders to ensure that framework delivers on the promise of an open, competitive, and reliable high-DER grid. United respectfully requests that the Commission adopt the threshold parameters identified above before directing the IOUs to file DER orchestration framework applications, consistent with the responses provided herein.

Respectfully Submitted July 27, 2026

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