BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED
07/27/26
04:59 PM
R2106017

Order Instituting Rulemaking to Modernize the Electric Grid for a High Distributed Energy Resources Future.	R.21-06-017 (Filed June 24, 2021)

OPENING COMMENTS OF THE UTILITY CONSUMERS' ACTION NETWORK ON THE ASSIGNED COMMISSIONER'S PROPOSAL ON FLEXIBLE SERVICE CONNECTIONS

Samuel Golding
President
Community Choice Partners, LLC

Jane Krikorian
Staff Attorney
Utility Consumers' Action Network
404 Euclid Avenue
San Diego, CA 92114
619-696-6966
jane@ucan.org

July 27th, 2026

TABLE OF CONTENTS

I. INTRODUCTION 1

II. COMMENTS ON THE PROPOSAL (QUESTION 1) 4

A. SECTIONS 1–3: THE AFFORDABILITY FRAMING AND THE CAPACITY DETERMINATION REFORMS ARE SOUND 4
B. SECTION 4: OPERATING ENVELOPES AND DYNAMIC CAPACITY MANAGEMENT 6
C. SECTION 5: CYBERSECURITY CONSIDERATIONS 14
D. SECTION 6: BRIDGING AND NON-BRIDGING APPROACHES 14
E. SECTION 7: COMPETITION AND MARKET ACCESS CONSIDERATIONS 17
F. SECTION 8: REAL-TIME PRICING — ENROLLMENT SHOULD BE OPT-IN, WITH PARTICIPATION PROTECTIONS UNDER EITHER DESIGN 19

III. RESPONSES TO RULING QUESTIONS 2 THROUGH 9 22

A. QUESTION 2: FEEDBACK ON THE SECTION 9 RECOMMENDATIONS 22
B. QUESTION 3: ADDITIONAL RECOMMENDATIONS IN SUPPORT OF THE PROPOSAL'S GOAL 26
C. QUESTION 4: ADVICE LETTER IMPLEMENTATION, DESIGN ELEMENTS, AND CONSOLIDATION 27
D. QUESTION 5: MEASUREMENT, TRACKING, AND REPORTING OF COSTS AND BENEFITS 32
E. QUESTION 6: COORDINATION WITH THE CALIFORNIA ENERGY COMMISSION 33
F. QUESTION 7: EXTENSION OF THE D.26-02-025 STANDARD OFFER TO SDG&E 34
G. QUESTION 8: HARDWARE, SOFTWARE, AND DATA SAFEGUARDS AGAINST PROPRIETARY RESTRICTION 38
H. QUESTION 9: SAFETY CONSIDERATIONS 40

IV. CONCLUSION 40

SUMARRY OF RECOMMENDATIONS

UCAN recommends that the Commission:

- Adopt the Proposal recommendations with the modifications summarized in Part III.A, which are provided in full and explained in context within Part II, Part III.C and Part III.F herein, notably including:
    - Restructuring real-time pricing enrollment as opt-in instead of opt-out, with default enrollment revisitable once R.26-04-009 establishes baseline customer protections, and with shadow billing, first-year bill protection, and a seamless right of return under either enrollment design (Part III.A, items 11–12; Part II.F);
    - Completing the Grid Edge DERMS scaling framework: an explicit obligation to scale to all eligible residential EV customers on services of ≤ 100 A; validation-triggered extension of default-mitigation status regardless of service size, with that question decided by the Commission rather than through the advice letter process; minimum advice letter contents for PG&E paralleling those prescribed for SCE and SDG&E; extension of the scaling assessment to single-phase small commercial customers on shared secondary infrastructure; and no conditioning of any offering on a territory-wide metering upgrade (Part III.A, item 4; Part II.B);
    - Directing SDG&E to implement its Standard Offer with eligibility keyed to avoiding or deferring ratepayer-funded upgrades rather than to energization delay, and to file its durable non-bridging version concurrently with its bridging version (Part III.A, items 1, 9; Part III.F);
    - Adopting the Proposal's four interoperability and customer-choice requirements in the Track 3 decision itself, with the Energy Division workshop addressing implementation details, rather than referring them to a workshop for discussion (Part III.A, item 10; Part II.E); and
    - Requiring a shared-savings evaluation framework in the Tier 2 Non-Bridging Solutions AL and a hardship exit from the ten-year non-bridging Standard Offer (Part III.A, items 7, 9; Part II.D).
- Integrate flexible connections into distribution planning: require flexible-connection alternatives analysis in the GNA/DDOR cycle, and require that projects avoided or deferred through flexible connections be identified and removed from capital plans, with attribution reported in the annual distribution planning proposals. (Part III.B.)
- Direct Energy Division to convene a workshop on compensation and shared-savings design for durable non-bridging offerings, to inform the shared-savings evaluation framework required of the Tier 2 Non-Bridging Solutions AL. (Parts II.D, III.B.)
- Adopt a uniform measurement and public reporting framework across all flexible connection offerings — utilization and service, financial, planning, and customer protection metrics, with cost-efficiency assessed at the portfolio level but reported with project-level granularity — incorporated into the D.24-09-020 biannual reports and annual distribution planning filings. (Parts III.B, III.D.)

- Adopt equity guardrails providing that flexible connections remain voluntary customer elections, prohibiting the steering of low-income customers toward non-firm service as the only timely option, and monitoring enrollment demographics alongside the planning-integration reporting. (Parts II.B, III.B.)
- Adopt the advice letter process refinements and required program design elements described in Part III.C: resolution of the Proposal's two AL tier-designation inconsistencies; a common Energy Division template for the Tier 2 FSC Implementation AL with joint filing of uniform elements; proportionate pre-filing review of draft advice letters before the adopted filing deadlines; and uniform eligibility criteria, standardized plain-language customer disclosures, capacity-sharing rules, education-first curtailment protocols, and dispute resolution procedures in each AL. (Part III.C.)
- Direct the IOUs to report the megawatts under bridging and non-bridging arrangements, and elections, conversions, and terminations, through the D.24-09-020 biannual reports and annual distribution planning filings served on the CEC, aligned with the IEPR demand forecast data cycle and with prompt flagging of conversions material to planned projects. (Part III.E.)
- Beyond the interoperability requirements adopted per Part III.A, adopt safeguards against proprietary restriction at each layer of the flexible connection framework — certified hardware from any manufacturer with local fail-safe control; no per-device or per-signal fees for access to ratepayer-funded platforms; preserved customer choice of provider, including on shared infrastructure, with switching free of new studies or fees; and machine-readable customer access to operating envelope schedules and capacity data. (Parts II.E, III.G.)

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.	R.21-06-017 (Filed June 24, 2021)

OPENING COMMENTS OF THE UTILITY CONSUMERS' ACTION NETWORK ON THE ASSIGNED COMMISSIONER'S PROPOSAL ON FLEXIBLE SERVICE CONNECTIONS

I. INTRODUCTION

The Utility Consumers' Action Network (UCAN) respectfully submits these Opening Comments pursuant to the Assigned Commissioner's and Administrative Law Judge's Ruling Requesting Comment on Assigned Commissioner's Proposal on Flexible Service Connections (Ruling), issued July 7, 2026, and the E-Mail Ruling Granting Schedule Modification, issued July 10, 2026. UCAN is a non-profit public benefit corporation that has represented residential and small business ratepayers before the Commission since 1983 and has participated in this proceeding since its inception.

The Proposal is the decisive turn this Track has needed. It converts the central lesson of the Track 3 record — that the technologies required to unlock existing distribution capacity are commercially mature and deployed in California today, while the binding constraints are policy-driven — into a concrete program of Commission action organized around ratepayer affordability. UCAN strongly supports the Proposal's architecture: the requirement that every investor-owned utility (IOU) evaluate flexible connection mitigations *before* initiating any ratepayer-funded distribution upgrade; the extension of the D.26-02-025 Standard Offer to

SDG&E; Limited Power arrangements implemented through certified UL 3141 devices as the default mitigation for distribution transformer and secondary conductor upgrades; Variable Operating Envelope offerings in SCE and SDG&E territory modeled on PG&E's production-proven Flex Connect; Grid Edge DERMS deployment for the secondary system; and, above all, the establishment of durable non-bridging solutions that treat customer flexibility as a permanent alternative to capital expenditure rather than a waiting room for it.

These are the reforms UCAN urged throughout this Track. UCAN asked the Commission to reject SDG&E's "no near-term need" narrative and direct near-term deployment of static operating envelopes in San Diego;[1] to require the IOUs to evaluate and exhaust customer-side load-limiting solutions as the default mitigation for secondary capacity constraints before authorizing traditional wire upgrades under Rules 15 and 16;[2] and to recognize demand flexibility as a permanent grid resource whose associated capital upgrades are removed from the utility's plans, not merely delayed.[3] The Proposal adopts the substance of each. UCAN also notes that the Proposal's cost-discipline on Enterprise DERMS—declining to scale Dynamic Operating Envelopes that depend on it, and routing that question to a workshop—correctly credits the concern, raised by UCAN and Cal Advocates, that the benefits of that architecture may not justify its costs.[4]

One recommendation in particular warrants restructuring before adoption. Section 8 would enroll every Variable and Dynamic Operating Envelope customer onto a real-time pricing

[1] Comments of the Utility Consumers' Action Network on the Track 3 All-Party Workshop Report, R.21-06-017 (Apr. 3, 2026) (UCAN Workshop Report Comments) at 3–5; Comments from Utility Consumers Action Network on Assigned Commissioner Houck's Ruling Issued November 3, 2025 (Dec. 19, 2025) (UCAN Opening Comments on ACR) at 2–3.

[2] UCAN Workshop Report Comments at 8–9.

[3] UCAN Workshop Report Comments at 9–11; UCAN Opening Comments on ACR at 7 (Question 23).

[4] Proposal at 48 & n.70 (citing UCAN December 19, 2025 Comments to ACR at 3 and Cal Advocates December 19, 2025 Comments on ACR at 1–2).

(RTP) rate by default, with an opt-out. Default enrollment with an opt-out is a meaningfully better design than the mandatory enrollment considered earlier in this Track—but the better course, and the one the record uniformly supports (including the filings the Proposal cites), is opt-in participation, presented clearly to every customer at the time of taking flexible service, with default enrollment revisited once the Advanced Rate Design proceeding (R.26-04-009) establishes baseline RTP customer protections. Under either enrollment design, the Commission should adopt shadow billing, first-year bill protection, and a seamless right of return, so that customers are encouraged to participate and to remain enrolled.

Finally, the Proposal stops one step short in several areas where the Commission should go further. It should require that avoided and deferred upgrades be verifiably removed from utility capital plans and reflected in the Grid Needs Assessment (GNA) and Distribution Deferral Opportunity Report (DDOR), so that ratepayers actually capture the savings the Proposal promises. It should put the durable non-bridging offerings on a footing to succeed, by pursuing a compensation and shared-savings framework in light of record evidence that comparable offerings have underperformed without a sufficiently strong customer value proposition. It should direct SDG&E, in addition to filing a bridging version of the Flexible Service Connection (FSC) Standard Offer, to file a durable non-bridging version at the same time. It should adopt the interoperability and customer-choice principles of Section 7 as binding requirements now, rather than referring them entirely to a workshop. And it should complete the Grid Edge DERMS scaling framework: make explicit the obligation to scale to all eligible residential EV customers on services of 100 A or smaller, prescribe for PG&E's advice letter the same minimum requirements prescribed for SCE's and SDG&E's, keep the question whether the offering becomes the default mitigation for all residential EV customers with the Commission rather than

the advice letter process, and adopt the uniform measurement framework and equity guardrails that will let the Commission verify both the savings and their fair distribution.

As directed by the Ruling, Part II of these comments provides UCAN's feedback on the Proposal within the same structure as the Proposal itself to address Question 1. Subsequently, Part III responds to Questions 2 through 9.

II. COMMENTS ON THE PROPOSAL (QUESTION 1)

Please provide feedback on the Proposal itself, identifying any concerns with and/or support for the direction and background. Comments on the Proposal shall be provided within the same structure as the Proposal where possible (e.g., discussion of Operating Envelopes should come in Section 4 of party comments).

A. Sections 1–3: The Affordability Framing and the Capacity Determination Reforms Are Sound

The Proposal's framing is correct and overdue: distribution infrastructure costs are "highly sensitive to load shapes and peak demand assumptions," meaning "distribution upgrade needs and costs are highly dependent on customer flexibility, not just customer load."[5] That is the affordability opportunity UCAN has pressed since the Electrification Impact Study (EIS) Part 2 record revealed tens of billions of dollars in forecast distribution upgrades—including PG&E's $15.9 billion estimate for secondary upgrades alone—premised on conservative planning assumptions that treat commercially available flexibility as if it did not exist.[6] The Proposal's focus on "predefined operational limits, contractually obligated flexibility, and customer-side controls" rather than near real-time provisioning of centralized commands[7] is the pragmatic, least-cost orientation the intervenor coalition urged, and it properly directs attention to the

[5] Assigned Commissioner's Proposal on Flexible Service Connections, Attachment 1 to the Ruling (July 7, 2026) (Proposal) at 10.
[6] UCAN Workshop Report Comments at 5–7.
[7] Proposal at 11.

Lateral primary and secondary systems where most customers—and most forecast costs—reside.[8]

Within Section 3, UCAN supports all four recommendations.[9] The flexible connection evaluation requirement (Recommendation 4 of Section 3) is the single most consequential reform in the Proposal: before initiating a ratepayer-funded distribution upgrade, each IOU must evaluate whether a Limited Power arrangement, Operating Envelope, or other PCS-enabled flexible solution can safely satisfy the customer's requested capacity, and must document and communicate that evaluation before proceeding to engineering and design.[10] This is, in substance, the default-mitigation policy UCAN asked the Commission to establish for the 2026–2027 distribution planning cycle.[11] To make it enforceable, the Tier 2 FSC Implementation AL should include auditable documentation standards and a customer-facing disclosure whose adequacy Energy Division can verify, and subsequent updates should flow through the annual distribution planning proposals as the Proposal contemplates.

Recommendation 2 of Section 3 (recording and providing service conductor capacity and demand load values within 30 days of request) closes an information asymmetry the Proposal itself documents: "[t]he IOUs do not make demand load values available to the customer and it is unclear whether they are retained once a customer is provided service."[12] Customers cannot self-

[8] Proposal at 10–11 & nn.14–15 (citing UCAN Workshop Report Comments at 9 and IREC Comments on All-Party Workshop Report at 7).
[9] The Proposal's recommendations for Commission action are set forth in Section 9 of the Proposal, organized by the substantive section of the Proposal to which each relates. Proposal at 43–56. For readability, these comments cite them in the form "Recommendation 4 of Section 3," referring to the fourth numbered recommendation appearing under the Section 3 heading of Section 9 of the Proposal.
[10] Proposal at 46.
[11] UCAN Workshop Report Comments at 8–9 (requesting that the Commission require the IOUs to "evaluate and exhaust customer-side load-limiting solutions as the default mitigation for secondary capacity constraints before any ratepayer-funded traditional wire upgrades are authorized under Tariff Rules 15 and 16").
[12] Proposal at 18.

implement Operating Limits they cannot see. Recommendation 3 of Section 3—modifying Rule 2 Section H.7 so that the PCS limit for controlled load is the lesser of connected load, demand load, or secondary conductor rating—responsibly answers the planning-integrity concern IREC raised about the connected-load pathway,[13] and the alignment of SCE's and SDG&E's Rule 2 with PG&E's IEEE 519 language is a sensible housekeeping measure. UCAN also supports the extension of the Standard Offer to SDG&E (Recommendation 1 of Section 3), which is addressed in detail in response to Question 7 in Part III.F below.

B. Section 4: Operating Envelopes and Dynamic Capacity Management

UCAN supports the five-tier capacity control framework and, in particular, its static-first orientation. UCAN has consistently advised that simple static limits deliver approximately 80 percent of the benefits at roughly 20 percent of the cost of advanced dynamic systems, and that customers should be able to interconnect today rather than wait for enterprise software maturity.[14] The Proposal operationalizes that principle.

1. Limited Power as default mitigation (Recommendation 1).

UCAN strongly supports making Limited Power arrangements, implemented by certified UL 3141 devices, the default mitigation for distribution transformer and secondary conductor upgrades. Because Limited Power requires "no utility communications channel, DERMS integration, interoperability testing, or real-time operational coordination,"[15] it is immune to the readiness asymmetries that have stalled this Track: it works in SDG&E territory today just as it works in PG&E territory. The Commission has already found that Standard Offer customers

[13] Track 3 All-Party Workshop Report (Mar. 20, 2026) (Workshop Report) at 115–118 (IREC); Proposal at 45 & n.66.
[14] UCAN Opening Comments on ACR at 3.
[15] Proposal at 24.

"should be able to find UL 3141 certified equipment for the majority of their needs."[16] This recommendation extends the benefits of flexible service to the Lateral primary and secondary customers whom Enterprise DERMS architectures cannot economically reach for years, if ever.

2. SCE and SDG&E Flex Connect analogues (Recommendation 2).

UCAN supports directing SCE and SDG&E to implement Variable Operating Envelope bridging offerings modeled on PG&E's Flex Connect within one year of a Track 3 decision, with quarterly Energy Division progress updates and the six-month preview workshop. The record documents a stark readiness asymmetry: PG&E has operated flexible connections in production since October 2024, while SCE's equivalent capability is planned for 2027–2028—a year later than SCE represented in its December 2024 Bridging Strategies report—and SDG&E has not yet selected a DERMS platform.[17] The Proposal correctly concludes that SCE's LCMS experience and SDG&E's WDAT As-Available Capacity pilot make a one-year implementation realistic.[18] The quarterly reporting and preview workshop are essential; without them, the record suggests these deadlines will quietly slip as SCE's prior commitments have.

3. Enterprise DERMS Dynamic Operating Envelopes (Recommendation 3)

UCAN supports the workshop-first approach. The Proposal correctly declines to scale Enterprise DERMS-based Dynamic Operating Envelopes, recognizing—as UCAN and Cal Advocates cautioned—that "the benefits may not justify the cost of the development effort,"[19]

---

[16] D.26-02-025, Finding of Fact 32; see Proposal at 24 & n.40.

[17] Workshop Report at 4 (PG&E), 8 (SDG&E); SCE Responses to ACR (Nov. 25, 2025) at 3 (Questions 1(a), 1(c)) (capability "not currently available" and planned for 2027–2028; "At the time of SCE's Bridging Strategies report in December 2024, the timeframe was stated as 2026-27."); SDG&E Responses to ACR (Nov. 25, 2025) at 10–12 (Questions 4, 4(a), 6) (DERMS head-end server "has not yet been selected"; procurement and integration planned for 2027–2028).

[18] Proposal at 47.

[19] Proposal at 48 & n.70.

and that Enterprise DERMS "may be best suited for managing a relatively limited number of large and operationally significant resources rather than serving as the primary control mechanism for very large populations of flexible connection customers."[20] There is likely value, as the Proposal recognizes, in continued IOU, Commission staff, and stakeholder work in this area before any capital commitment is made.

4. Grid Edge DERMS (Recommendations 4 and 5).

UCAN strongly supports requiring SCE and SDG&E to implement ChargeBoost-like Grid Edge DERMS offerings for residential EV customers, and the accompanying Energy Division workshop series. Grid Edge architectures compute Operating Envelopes locally, avoiding both the scalability limits of Enterprise DERMS and the $20,000 to $50,000 per-site communications and control costs that make direct utility integration prohibitive for all but the largest customers.[21] UCAN particularly endorses the workshop question of "[e]nsuring that more devices than EV chargers can be locally controlled to ensure rapid response and prevent ongoing access fees"[22]—a direct answer to the record's warning that the fees equipment manufacturers or service providers charge for access to customer-owned equipment "may counterbalance ratepayer savings from avoided upgrades or promote vendor lock-in."[23] UCAN further recommends that the consumer protections it identified earlier in this Track be included among the workshop topics: transparency and documentation of the grid conditions asserted to justify

[20] Proposal at 30.

[21] PG&E Response to ACR (Nov. 25, 2025) at 11 (direct connections between single-phase customers and PG&E's DERMS are "cost prohibitive (on the order of tens of thousands of dollars)"); IREC Comments on ACR (Dec. 19, 2025) at 13 (PG&E estimates customers must spend "between $20,000 and $50,000, and sometimes more" for Flex Connect communications and controls); Reply Comments from Utility Consumers Action Network (Jan. 2, 2026) (UCAN Reply Comments on ACR) at 4.

[22] Proposal at 49.

[23] Proposal at 37 & n.58 (citing SDG&E's December 19, 2025 response to ACR at 5, 9–10, and Universal Devices' April 4, 2026 Comments on All-Party Workshop Report at 6).

curtailment of a flexible connection, non-discriminatory curtailment protocols, and safeguards ensuring that operational flexibility does not become a substitute for routine maintenance.[24]

The scaling framework in Recommendation 4 of Section 4 is well conceived, and its central virtue should be made explicit. As written, the recommendation directs all three large IOUs to propose "how they plan to scale this offering beyond the first 1,000 customers"—the how, not the whether—while reserving a single open policy question: "whether this approach should become the default mitigation for all residential EV customers, not just those on 100 A services."[25] UCAN reads the first clause as an implicit direction that the offerings will scale to the full population of eligible residential EV customers on 100 A services, with the advice letters supplying the schedule and mechanics, and commends that design. The decision should state the obligation explicitly, so that the advice letter process cannot relitigate whether scaling occurs. The decision should also clarify that the eligible population comprises customers on services of 100 A or smaller: read literally, "100 A services" would exclude homes on sub-100 A services—a small population, but one concentrated in the State's oldest and lowest-income housing, where upgrade costs bind hardest.[26]

What remains genuinely open, then, is the extension of default-mitigation status beyond the 100 A population—and the Commission should answer that question affirmatively, conditioned on validation, rather than leave it to three utility-authored proposals. By validation, UCAN means a concrete showing, drawn from the data reported under the measurement

[24] UCAN Opening Comments on ACR at 3–5 (Questions 16–18); UCAN Reply Comments on ACR at 7.
[25] Proposal at 49.
[26] Less, Walker & Murphy (Lawrence Berkeley National Laboratory) and Fournier (UCLA), Electrical Service Panel Capacity in California Households with Insights for Equitable Building Electrification, 2024 ACEEE Summer Study on Energy Efficiency in Buildings (2024) (Less et al.) (estimating that 1.8 to 3.0 percent of California single-family homes have panel capacity below 100 A); see also Quantifying the electric service panel capacities of California's residential buildings, 190 Energy Policy (2024).

framework described in response to Question 5, that the initial deployments have (1) maintained shared transformer and secondary conductor loading within applicable ratings; (2) modulated EV charging without material degradation of the customer charging experience; and (3) avoided or deferred the targeted upgrades at a program cost below the verified cost of the upgrades displaced. The decision can make the extension self-executing: direct that, upon an Energy Division determination that these criteria are satisfied—made on the reported data, through a Tier 2 compliance filing—the default-mitigation obligation extends to all residential EV energization requests that would otherwise trigger a distribution transformer or secondary conductor upgrade, regardless of service size. The service-size screen is a proxy, not a boundary. The constraint Grid Edge DERMS manages is the loading of the shared service transformer and secondary conductor,[27] and a cluster of homes on 200 A services can overload a shared transformer just as surely as homes on 100 A services once EV charging stacks onto building electrification. The population outside the screen is also the majority: PG&E reports that roughly half of the customers in its territory remain on 100 A panels,[28] and the best available independent estimate places approximately 35 percent of California single-family homes at or below 100 A capacity—meaning that a 100 A-only default would leave one-half to two-thirds of residential customers outside the framework, even as the homes inside it skew heavily toward disadvantaged communities and the lowest-income households.[29] The 100 A cohort should come first—those customers face upgrade paths the record prices in the thousands to tens of thousands

[27] Proposal at 22–23 (Grid Edge Dynamic Operating Envelopes "primarily focus on limiting small loads to avoid constraints on secondary transformers and conductors"); id. at 30–31 (describing the virtual transformer model built from contiguous customers' metering data).

[28] Workshop Report at 65 (PG&E EPIC 4.02 presentation).

[29] Less et al. (estimating 31.7 to 33.3 percent of single-family homes at exactly 100 A, approximately 35 percent at or below; 46 percent at or below 100 A within disadvantaged communities, versus 31 percent outside them; and 39 percent among households below 30 percent of area median income).

of dollars per site, and can least afford them[30]—but first should not mean only. The justification for directing the broader outcome is the Proposal's own: Section 9 rests the recommendation on "the outsized role that EV charging and secondary upgrades play in projected infrastructure costs,"[31] and PG&E has already made its EPIC 4.02 programs its "default mitigation for secondary capacity constraints experienced by residential customers on 100 A services."[32] Converting a validated practice into the default planning assumption is what produces ratepayer savings at forecast scale; leaving the question to utility-authored advice letters invites three different answers on three different schedules.

Nor should the scaling assessment stop at the residential class line. Nothing in the record justifies excluding single-phase small commercial customers served from shared secondary infrastructure: a small business on a shared service transformer presents the same constraint physics, and the same avoided-upgrade economics, as the residence next door. The Small Business Utility Advocates made this point earlier in this Track—noting that many small commercial customers, such as offices and retail stores, take single-phase service in the 200 A category, objecting to pilot descriptions that would confine grid-edge tools to the "customer's home," and asking that single-phase directives be clarified to apply to residential and commercial customers alike.[33] UCAN, which represents San Diego's residential and small business customers, recommends that the Tier 2 Grid Edge DERMS AL scaling proposals and the Energy Division workshop scope expressly address extension to single-phase small commercial customers on shared secondary infrastructure.

[30] Proposal at 37 n.59; Workshop Report at 65 (service upgrades of $3,000 to $50,000 per site with two-to-twelve month durations).
[31] Proposal at 49.
[32] Proposal at 31.
[33] SBUA Reply Comments on ACR (Jan. 2, 2026) at 3–4.

The assignment of the remaining discretionary question matters as much as its answer. Whether Grid Edge DERMS becomes the default mitigation for all residential EV customers regardless of service size sets the planning assumption for the majority of residential customers, and for what the Proposal identifies as an outsized driver of forecast infrastructure costs. As drafted, however, the Proposal would have each IOU "propose" the answer in a Tier 2 advice letter—a vehicle disposed of by Energy Division under delegated authority, ill-suited to a discretionary determination of this magnitude, and capable of producing three different policies across the three service territories.[34] UCAN's primary recommendation resolves the problem cleanly: the Commission should decide the question in the Track 3 decision, conditioned on validation, as described above. In the alternative, if the Commission prefers to receive the IOUs' proposals first, the default-mitigation element should be severed from the Tier 2 Grid Edge DERMS AL and resolved by Commission action—a Tier 3 resolution, or a subsequent decision on the workshop record and validation data—while the initial deployments and the directed 100 A scaling proceed on the Tier 2 schedule. Under either path, the initial offerings launch without delay, and the decision-maker on the default-mitigation question is the Commission.

One further ambiguity in Recommendation 4 of Section 4 should be resolved: the scope of PG&E's obligations in the Tier 2 Grid Edge DERMS AL. The Proposal's executive summary would "direct PG&E to expand and scale this pilot," but Section 9 prescribes minimum advice letter contents only for SCE and SDG&E—a ChargeBoost-like offering established within six months, with any differences from ChargeBoost explained—leaving PG&E's only express

[34] Proposal at 49; see General Order 96-B, General Rules 5.1–5.3 (Tier 2 advice letters become effective upon staff approval under delegated authority; matters requiring the Commission's own judgment are disposed of by Commission resolution under Tier 3).

obligation the common scaling-and-default proposal.[35] The result is a paradox: the two utilities without the capability face deadlines and minimum requirements, while the utility with the working program faces neither—and the benchmark against which SCE and SDG&E must explain their differences remains an EPIC pilot with no defined scope. The decision should prescribe a parallel floor for PG&E's AL: (1) formalization of ChargeBoost as a standing offering beyond EPIC pilot status—the same transparency logic, grounded in Public Utilities Code Section 489(a), on which the Proposal recommends tariffing Flex Connect;[36] (2) reporting of current enrollment and performance results; (3) an expansion schedule reaching all eligible residential EV customers on services of 100 A or smaller in PG&E's territory; and (4) the funding transition from EPIC to program status.

Finally, metering prerequisites should be framed accurately, so that they cannot become the next artificial gatekeeper. PG&E has not received authorization for a ubiquitous AMI 2.0 rollout; it deploys AMI 2.0 meters selectively, at sites participating in its EV programs—one meter per connecting customer, and one meter per service transformer where a shared transformer is virtualized.[37] The Tier 2 Grid Edge DERMS ALs should reflect that same model: SCE and SDG&E should procure and deploy the necessary meters selectively, as program enrollment requires, and no IOU should be permitted to condition its Grid Edge DERMS offering—or delay it—pending a territory-wide metering upgrade.

[35] Compare Proposal at 7 ("direct PG&E to expand and scale this pilot") with Proposal at 48–49 (prescribing implementation requirements for SCE and SDG&E only).
[36] Proposal at 53.
[37] Workshop Report at 13 (PG&E: only meters serving new flexible loads require replacement); id., Appendix B at 24 (one AMI 2.0 meter per connecting customer; the "minimum to virtualize a service transformer is one per service transformer").

C. Section 5: Cybersecurity Considerations

UCAN supports adopting the SIO-CS phased requirements as the baseline cybersecurity framework for communicating flexible connection systems larger than 1 MW, and the workshop-and-AL implementation process, including the requirement that IOUs justify deviations. UCAN's sole caution is proportionality: the Commission should not permit utility-grade security requirements to migrate below the 1 MW threshold in ways that recreate the hardware cost barriers this Proposal otherwise dismantles. For residential and small commercial customers, the fail-safe design principle the Proposal adopts elsewhere—on communications loss, the PCS defaults to the firm capacity of the underlying Static Operating Envelope[38]—already bounds the reliability consequence of any compromised or failed communications channel, and Limited Power arrangements implemented through certified UL 3141 controls operate without any utility communications channel at all.

D. Section 6: Bridging and Non-Bridging Approaches

Section 6 is the heart of the Proposal, and UCAN supports it emphatically. Throughout this Track, UCAN has argued that the fundamental policy question is whether demand flexibility is "merely a temporary waiting room until traditional infrastructure can be built," or "a permanent, structural alternative to wires"—and that a bridging-only regime forces ratepayers to pay twice: once for the control infrastructure that manages the temporary bridge, and again for the capital upgrade when the bridge ends.[39] The Proposal's persistent and durable non-bridging taxonomy, its finding that durable solutions "offer the greatest potential benefits because they

[38] Proposal at 26, 29; see also id. at 24 (Limited Power requires no utility communications channel, DERMS integration, or real-time operational coordination); UCAN Opening Comments on ACR at 4 (Question 17) and 9 (Question 27) (cautioning that hardware and communications requirements costing tens of thousands of dollars per site would exclude residential and small commercial customers); UCAN Reply Comments on ACR at 4–5.
[39] UCAN Workshop Report Comments at 9–11.

can avoid capital expenditures entirely, increase utilization of existing assets, preserve the remaining undepreciated value of constrained equipment, and generate additional utility revenue,"[40] and its recommendations to establish durable non-bridging offerings, a non-bridging Standard Offer with a ten-year term, and a non-bridging Flex Connect for load customers, together constitute the structural reform the intervenor coalition sought.[41]

UCAN likewise supports the bridging-to-non-bridging election (Recommendation 2 of Section 6) and the 45-day election window, which fairly balances customer flexibility against the stranded-cost concern SCE raised.[42] Two implementation safeguards are appropriate. First, where engineering and design costs incurred before a customer's opt-out are rate-based, recovery should be limited to documented, prudently incurred costs subject to Energy Division review—not a blanket pass-through. Second, the "reasonable period of time" during which a persistent non-bridging customer may not demand the foregone upgrade should be defined in the AL itself (UCAN suggests a term of five years, or the remaining life of the constraining asset if shorter) so it is not left to per-customer negotiation.

UCAN supports the ten-year durable non-bridging Standard Offer term and the requirement of UL 3141 certified controls for it. For residential and small commercial participants, the ALs should include a hardship exit—permitting early termination upon a bona fide change in circumstances (e.g., medical baseline enrollment, change of occupancy)—so that a

[40] Proposal at 36.

[41] See, e.g., Cal Advocates Comments on ACR (Dec. 19, 2025) at 5 (recommending the Commission "pursue non-bridging [Flexible Service Connections] as an option for both single-phase and polyphase customers wherever an import or export limit can cost-effectively avoid or defer a distribution upgrade"); IREC Reply Comments on ACR (Dec. 31, 2025) at 7 ("Most parties support pursuing non-bridging solutions, which are key to the value of flexible connections for ratepayers."); Clean Coalition Comments on ACR (Dec. 19, 2025) at 4.

[42] Proposal at 37–38 & n.61.

decade-long commitment does not become a trap for small customers whose circumstances change.

The Proposal stops short, however, in two respects:

1. First, customer participation. UCAN's objective is the maximization of ratepayer savings, and the Proposal locates the "greatest potential benefits" for ratepayers in precisely these durable non-bridging solutions.[43] Those benefits materialize only if customers actually elect the offerings and remain on them, and the record gives concrete grounds for concern on that score. The Proposal itself acknowledges that "one approach to addressing these high customer costs would be an incentive or rebate structure based on the avoided upgrade cost or customer allowance value," but "does not explicitly recommend this."[44] SCE attributes the failure of the Distribution Investment Deferral Framework in part to "an overly complex system with insufficient compensation";[45] and VGIC cautioned at the All-Party Workshop that customers incur real, upfront costs to implement non-bridging strategies and that, without some form of incentive or compensation, "there is limited value in advancing discussion of non-bridging FSCs."[46] UCAN does not ask the Commission to adopt incentives in this decision. It asks the Commission to protect the offerings' prospects of success: direct Energy Division to convene a workshop on compensation and shared-savings design, and require the Tier 2 Non-Bridging Solutions AL to include an evaluation framework under which any future incentives remain below the verified avoided or deferred upgrade value—a

[43] Proposal at 36.
[44] Proposal at 37.
[45] SCE Updated Responses to ACR (Dec. 19, 2025) at 10 ("SCE cautions that an overly complex system with insufficient compensation must be avoided; this was among the causes for the failure of the Distribution Investment Deferral Framework (DIDF).").
[46] Workshop Report at 10 (VGIC).

structure that preserves a guaranteed net benefit for ratepayers while giving participating customers a durable reason to enroll and stay enrolled.[47]

2. Second, planning integration. Ratepayers capture the savings from a durable non-bridging solution only if the avoided project actually leaves the utility's capital plan. The Proposal states the objective of "moving towards incorporation of these offerings within the utility Distribution Planning Process,"[48] but orders nothing to effectuate it. The Commission should require that (1) flexible-connection alternatives analysis be reflected in each IOU's GNA and DDOR submissions; (2) projects avoided or deferred through flexible connections be identified, with attribution, in those filings and in the annual distribution planning proposals; and (3) associated forecast adjustments flow through to the CEC coordination process described in response to Question 6. Absent that closure, the danger UCAN identified remains: flexibility defers the capital project without ever cancelling it, and the rate base grows regardless.[49]

E. Section 7: Competition and Market Access Considerations

Section 7 states the right principles: information regarding capacity constraints and Operating Envelope requirements should be available; customers "should retain the ability to choose how they satisfy flexible connection requirements, whether through utility programs, OEM-provided solutions, third-party aggregators, CCAs, or self-managed equipment"; and flexible connection frameworks must not "confer undue advantages on particular technologies, vendors, or market actors."[50] UCAN's concern is procedural: the Proposal's only action item is a workshop. The

[47] Workshop Report at 145 (VGIC net-benefit design); UCAN Opening Comments on ACR at 7 (Question 23) (supporting permanent flexible arrangements "provided the savings are shared with the participating customer").
[48] Proposal at 43.
[49] UCAN Workshop Report Comments at 10–11.
[50] Proposal at 39.

record already establishes the problem—PG&E confirmed at the All-Party Workshop that its DERMS aggregator interface is currently proprietary, with an open interface only "under development,"[51] and CCAs, aggregators, and technology providers documented the competitive risks of enterprise-platform information asymmetries and proprietary device pathways.[52]

The Commission should adopt the following as requirements in the Track 3 decision, reserving the workshop for implementation details: (1) IOU DERMS and aggregator interfaces must be open, documented, and non-exclusive, published on a defined timeline;[53] (2) protocol neutrality consistent with Rule 21's mutual-agreement provisions—IEEE 2030.5/CSIP as the utility-facing baseline, with OpenADR and other protocols permitted where the parties agree, particularly downstream of cloud interfaces;[54] (3) customer choice of provider on shared infrastructure—where several customers share a service transformer or secondary conductor and their operating envelopes are coordinated as a group, no single aggregator or platform vendor may hold the exclusive right to manage all customers on that shared asset; each customer must remain free to select any qualified provider, or to self-manage, with coordination accomplished through the operating envelope assigned at each customer's point of common coupling;[55] and (4) no conditioning of participation in a ratepayer-funded flexible connection offering on proprietary subscriptions or recurring third-party access fees.[56] These requirements cost nothing to adopt

[51] Workshop Report at 14.

[52] Proposal at 39 & n.63; Workshop Report at 136–140 (CalCCA).

[53] Accord Universal Devices Comments on All-Party Workshop Report (Apr. 4, 2026) at 10–11.

[54] Electric Rule 21 provides that "other application-level protocols may be used by mutual agreement of the parties." See Workshop Report at 139 (CalCCA); UCAN Workshop Report Comments at 11–13.

[55] CalCCA Comments on ACR (Dec. 19, 2025) at 11; cf. Workshop Report at 14–15 (PG&E confirming that its aggregator interface "will be open to multiple aggregators").

[56] See Proposal at 37 & n.58 (fees charged for access to customer-owned equipment "may counterbalance ratepayer savings from avoided upgrades or promote vendor lock-in"); id. at 49 (workshop objective of preventing "ongoing access fees"); Universal Devices Comments on All-Party Workshop Report (Apr. 4, 2026) at 6–7.

now and prevent the market structure from hardening around incumbents while the workshop process runs.

F. Section 8: Real-Time Pricing — Enrollment Should Be Opt-In, With Participation Protections Under Either Design

UCAN agrees with Section 8's premise: operating envelopes communicate the physical availability of distribution capacity, real-time prices communicate its economic value, and for suitably equipped customers the two signals can be complementary. UCAN also acknowledges that the Proposal recommends default enrollment with an opt-out and a preserved right to return to the customer's prior rate[57]—a meaningfully better design than the mandatory enrollment considered earlier in this Track. UCAN nonetheless recommends that enrollment be opt-in, for three reasons.

First, the record supports opt-in. Every party that addressed the question—including all three IOUs—recommended that dynamic rate participation for flexible connection customers remain voluntary: SCE "strongly believes that dynamic rates should exclusively be an opt-in offering";[58] PG&E cautioned that "the operating envelope may constrain a customer's ability to optimize load response to prices" and that "not all customers who can manage load within a variable or dynamic operating envelope may be able to manage load under a complex dynamic pricing structure";[59] SDG&E answered the mandatory-enrollment question with a flat "No," explaining that "[r]equiring customers to enroll in a pilot defeats the purpose of a pilot";[60] Cal Advocates documented that "the dynamic rate pilots have not shown consistent or large impacts

[57] Proposal at 42, 55.
[58] SCE Updated Responses to ACR (Dec. 19, 2025) at 1; see also id. at 11–12 (identifying double-compensation and dispatch-priority conflicts between operating envelope incentives and dynamic rates).
[59] PG&E Supplemental Response to ACR (Dec. 10, 2025) at 5–6.
[60] SDG&E Response to ACR (Dec. 19, 2025) at 11 (Question 28).

to load";[61] and CalCCA, Enphase, and The Mobility House reached the same conclusion.[62] The filings that footnote 64 of the Proposal cites are consistent with these customers being well suited to RTP, but not with defaulting them onto it: The Mobility House's cited page states that "dynamic rates should remain opt-in for flexible connections customers."[63]

Second, the Advanced Rate Design proceeding (R.26-04-009) is examining the customer protections and education requirements that would govern the very RTP rates at issue, as the Proposal acknowledges.[64] Beginning with opt-in enrollment preserves the Commission's ability to revisit default (opt-out) enrollment for flexible connection customers once R.26-04-009 establishes those baseline protections, and avoids asking customers who are new to operating envelopes to absorb an unfamiliar rate structure by default—a pairing that could dampen enthusiasm for the flexible connection offerings this Proposal exists to scale.[65]

Third and most fundamentally, the operating envelope and the price signal will frequently conflict — leaving many defaulted customers structurally unable to benefit from and potentially harmed by RTP. PG&E's Electrification Impact Study Part 2 analysis found, "based on five years of historical data, that only approximately 45% of distribution feeders were strongly correlated with system-level prices during summer evenings and approximately 12% exhibited negative correlation." [66] Because the operating envelope is, and must remain, the binding constraint, a

[61] Cal Advocates Comments on ACR (Dec. 19, 2025) at 8.
[62] CalCCA Comments on ACR (Dec. 19, 2025) at 12; Enphase Comments on ACR (Dec. 19, 2025) at 4 ("electing one program should not obligate the customer to participate in the other, at least at this early stage when both program areas are under development"); The Mobility House Comments on ACR (Dec. 18, 2025) at 3–4; see also Workshop Report at 74 (PG&E recommending that dynamic pricing "remain an active optional choice"), 10 (CalCCA), 10–11 (VGIC).
[63] Proposal at 41 n.64; The Mobility House Comments on ACR (Dec. 18, 2025) at 3.
[64] Proposal at 41.
[65] UCAN Workshop Report Comments at 13–15; UCAN Reply Comments on ACR at 5–6.
[66] PG&E Reply Comments on the March 23 Ruling (Apr. 30, 2026) at 4 & n.9 (citing PG&E EIS Part 2 Report, Attachment A at 95 (Jan. 28, 2026)).

customer served from one of the majority of feeders that are weakly or negatively correlated with system prices will often find the envelope tightening in the very hours when system prices are low—the hours an RTP customer must exploit to generate bill savings. That customer cannot chase low prices without exceeding the envelope, and the envelope will not yield, because local conditions, not system prices, define it. Defaulted onto RTP, the customer bears the rate's volatility with diminished flexibility to capture its upside: a structural likelihood of economic harm relative to their otherwise applicable rate. This quantifies PG&E's own caution, previously quoted above, that "the operating envelope may constrain a customer's ability to optimize load response to prices"—and the same study confirms where the distribution value actually comes from: grid-aware, locationally targeted orchestration, which PG&E found was "required to avoid triggering new local overloads and upgrades and achieved material distribution infrastructure cost reductions." [67]

Consequently, UCAN recommends that the Commission adopt Section 8's recommendations with enrollment restructured as opt-in: the IOUs should present available RTP options, with plain-language explanatory material and an estimated bill comparison to every customer at the time of taking service under a Variable or Dynamic Operating Envelope — so that RTP is elected by the customers actually positioned to benefit (e.g., those on strongly price-correlated feeders, or with storage capable of arbitraging within a binding envelope) rather than imposed by default on a population for whom envelope and price will frequently pull in opposite directions, causing economic harm. The decision could provide that opt-out enrollment may be reconsidered following the outcome of R.26-04-009. Whichever enrollment design the Commission adopts — opt-in or opt-out —it should also adopt participation protections that

[67] PG&E Reply Comments on the March 23 Ruling (Apr. 30, 2026) at 4 & n.10 (citing PG&E EIS Part 2 Report, Attachment A at 95–96).

encourage customers to try RTP and remain on it: mandatory shadow billing against the customer's prior rate for at least twelve months; bill protection holding the customer harmless for the first year; and prominent notice with a seamless, penalty-free right of return.[68] Relatedly, UCAN supports Recommendation 2 of Section 8 (data tracking) under either design, and recommends adding realized bill impacts relative to the customer's prior rate, the timing of and stated reasons for opt-outs or elections, and enrollment demographics sufficient to monitor whether flexible connections or RTP enrollment concentrate in disadvantaged communities.

III. RESPONSES TO RULING QUESTIONS 2 THROUGH 9

A. Question 2: Feedback on the Section 9 Recommendations

Section 9 of the Proposal includes a summary of the recommendations for Commission action. Please provide feedback on the recommendations, being as specific as possible regarding the pros and cons of the proposed recommendations, and on the feasibility of implementation.

UCAN supports adoption of the following recommendations as presented in the Proposal: Section 3 Recommendations 2 and 3; Section 4 Recommendations 1 and 3; and Section 6 Recommendation 3.

UCAN supports the remaining recommendations with the modifications listed below. The list summarizes recommendations UCAN has explained in context in Part II, with the following exceptions: the modifications to the D.26-02-025 requirements for SDG&E's Standard Offer (item 1 below) and the direction that SDG&E implement its non-bridging Standard Offer concurrently with its bridging offering (item 9 below) are explained in Part III.F, in response to Question 7; and the advice letter tier-designation clarifications (items 3 and 6 below) are explained in Part III.C, in response to Question 4.

[68] See UCAN Opening Comments on ACR at 9–10; UCAN Workshop Report Comments at 14–15.

1. **Section 3 Recommendation 1 (SDG&E Standard Offer):** make the offering available wherever a flexible connection can avoid or defer a ratepayer-funded upgrade—including upgrades triggered within Rule 15 and 16 allowances—rather than only where an upstream constraint delays energization; direct SDG&E to file its durable non-bridging counterpart concurrently in the same Tier 2 Advice Letter; and apply the further modifications to the D.26-02-025 requirements described in Part III.F (reporting parity, preliminary capacity assessment parity, wholesale adoption of the technical requirements, and no memorandum account).
2. **Section 3 Recommendation 4 (pre-upgrade flexible connection evaluation):** require the Tier 2 FSC Implementation AL to include auditable documentation standards, uniform eligibility criteria consistent across the large IOUs, and the customer communication process, with subsequent updates through the annual distribution planning proposals.
3. **Section 4 Recommendation 2 (SCE and SDG&E Flex Connect analogues):** clarify that the Flex Connect AL is a Tier 3 Advice Letter, and retain the quarterly Energy Division progress updates and six-month preview workshop as adopted requirements.
4. **Section 4 Recommendation 4 (Grid Edge DERMS implementation):** (a) make explicit that the offerings shall scale to all eligible residential EV customers on services of 100 A or smaller, with the Tier 2 Grid Edge DERMS ALs proposing the schedule and mechanics of that scaling rather than whether it occurs; (b) direct that, upon an Energy Division determination that the initial deployments satisfy the validation criteria described in Part II.B.4 (drawn from the Question 5 measurement framework), Grid Edge DERMS offerings become the default mitigation for all residential EV energization requests that would otherwise trigger a distribution transformer or secondary conductor upgrade, regardless of

service size; (c) prescribe minimum contents for PG&E's Tier 2 Grid Edge DERMS AL paralleling those prescribed for SCE and SDG&E—formalization of ChargeBoost as a standing offering beyond EPIC pilot status, current enrollment and performance results, an expansion schedule, and the funding transition from EPIC; (d) clarify that selective deployment of AMI 2.0 or equivalent meters at participating customer sites satisfies the offering's metering requirements, and that no IOU may condition or delay its offering pending a territory-wide metering upgrade; (e) direct that the scaling proposals address extension to single-phase small commercial customers served from shared secondary infrastructure; and (f) provide that, if the default-mitigation question is not decided in the Track 3 decision itself, that element be severed from the Tier 2 Grid Edge DERMS AL and resolved by Commission resolution or subsequent decision rather than by staff disposition.

5. **Section 4 Recommendation 5 (Grid Edge DERMS workshops):** include within the workshop scope, in addition to the topics identified in the Proposal: transparency and documentation of the grid conditions asserted to justify curtailment of a flexible connection; non-discriminatory curtailment protocols; safeguards ensuring that operational flexibility is not used to defer routine maintenance; CCA and third-party program access; and applicability to single-phase small commercial customers served from shared secondary infrastructure.
6. **Section 5 Recommendation 1 (cybersecurity baseline):** clarify the Cybersecurity Implementation AL's tier designation, and provide that requirements applied to systems at or below 1 MW remain proportionate to system size and risk.
7. **Section 6 Recommendation 1 (durable non-bridging solutions):** require the Tier 2 Non-Bridging Solutions AL to include, in addition to the elements identified in the Proposal, a

shared-savings evaluation framework under which any customer incentives remain below verified avoided or deferred upgrade value.

8. **Section 6 Recommendation 2 (bridging-to-non-bridging election):** provide that engineering and design costs rate-based upon a customer's transition are limited to documented, prudently incurred amounts; and define in the Tier 2 FSC Implementation AL the period during which a transitioning customer may not request the foregone upgrade (UCAN suggests five years, or the remaining life of the constraining asset if shorter).
9. **Section 6 Recommendation 4 (non-bridging Standard Offer):** add a hardship exit for residential and small commercial customers, and direct SDG&E to implement its non-bridging version concurrently with its bridging Standard Offer.
10. **Section 7 Recommendation 1 (interoperability and customer choice):** adopt in the Track 3 decision, as requirements rather than workshop topics: (a) IOU DERMS and aggregator interfaces shall be open, documented, and non-exclusive, published on a defined timeline; (b) communications protocols in addition to IEEE 2030.5/CSIP are permitted by mutual agreement consistent with Electric Rule 21; (c) no aggregator or vendor shall hold an exclusive right to manage all customers on shared secondary infrastructure; and (d) participation in a flexible connection offering shall not be conditioned on proprietary subscriptions or recurring third-party access fees; with the Energy Division workshop addressing implementation details.
11. **Section 8 Recommendation 1 (RTP enrollment):** provide for opt-in enrollment—direct the large IOUs to present available RTP rate options, with plain-language explanatory materials and an estimated bill comparison, to each customer at the time of taking service under a Variable or Dynamic Operating Envelope; provide that default enrollment may be

revisited following the resolution of customer protection issues in R.26-04-009; and, under either enrollment design, require shadow billing for at least twelve months, first-year bill protection, and a seamless right of return to the customer's prior rate.

12. **Section 8 Recommendation 2 (data tracking):** add realized bill impacts relative to the customer's prior rate, the timing of and stated reasons for opt-outs or elections, and enrollment demographics sufficient to monitor participation in disadvantaged communities.

B. Question 3: Additional Recommendations in Support of the Proposal's Goal

Section 9 of the proposal summarizes recommendations for Commission action based on the stated goal of the proposal. Do parties find that any additional recommendations are warranted in support of this goal?

Four recommendations in addition to those summarized in Part III.A above would materially advance the Proposal's stated goal of reducing ratepayer spending on grid upgrades while ensuring safe, reliable, and timely energization. Noted below is the Proposal section with which the recommendation is associated and where UCAN discusses it herein:

1. Planning integration (associated with Proposal Section 6; discussed in Part II.D above). Require flexible-connection alternatives analysis in the GNA/DDOR cycle, and require that projects avoided or deferred through flexible connections be identified and removed from capital plans, with attribution reported in the annual distribution planning proposals. Ratepayer savings that never reach the capital plan are not savings.
2. Compensation and shared-savings workshop (associated with Proposal Section 6; discussed in Part II.D above). Support customer participation in durable non-bridging offerings by establishing a compensation and shared-savings framework, developed through an Energy Division workshop and reflected in the Tier 2 Non-Bridging Solutions

Advice Letter (AL) evaluation criteria, in light of record evidence that comparable offerings have underperformed without a customer value proposition.

3. Uniform measurement and public reporting (associated with Proposal Sections 2 and the Section 9 recommendations generally; detailed in Part III.D below). Adopt a uniform, public measurement and reporting framework across all flexible service connection offerings, standardized across the three IOUs, using the metrics detailed in response to Question 5, folded into the D. 24-09-020 biannual reports and annual distribution plan filings.

4. Equity guardrails (associated with Proposal Sections 6 and 8; discussed in Parts II.B.4 and II.F above). Provide that flexible connections remain voluntary customer elections; prohibit steering low-income customers toward non-firm service as the only timely option while similarly situated customers receive firm capacity; and monitor enrollment demographics through the data tracking framework. UCAN raised this concern early in this Track, and the Proposal is currently silent on it.

On the final point, UCAN's prior comments urged that tariffs "ensure equity by preventing flexible connections from becoming the default or only option for low-income customers while wealthier customers receive firm capacity guarantees."[69] That guardrail belongs in the Tier 2 FSC Implementation AL requirements, and precision about what it restrains matters, because "default" carries two distinct meanings in this framework. UCAN supports flexible connections as the default *mitigation*—the first alternative each IOU must evaluate, and offer, before committing ratepayer funds to an upgrade. That planning-side default operates to the customer's benefit, and it matters most for the population first in line under the Proposal: homes at or below 100 A panel

[69] UCAN Opening Comments on ACR at 9 (Question 27).

capacity are concentrated in disadvantaged communities (46 percent, versus 31 percent outside them) and among the lowest-income households (39 percent of households below 30 percent of area median income).[70] For these households, a well-designed flexible connection is the difference between electrifying now and facing an upgrade path priced in the thousands to tens of thousands of dollars per site. What the guardrail protects against is a customer-side default: non-firm service becoming the only option effectively available to low-income customers — offered without a genuine choice between the flexible connection and the conventional upgrade, delivered at degraded quality, or used to justify withholding infrastructure investment from particular neighborhoods while comparable requests elsewhere receive firm capacity. Three safeguards keep the two defaults distinct: every flexible connection offering remains a voluntary customer election, with the conventional upgrade path preserved; performance under the envelope is verified through the Question 5 metrics; and enrollment demographics are monitored alongside the planning-integration reporting recommended above, so that the Commission can confirm flexibility is reaching these communities as a benefit conferred, not a burden imposed.

C. Question 4: Advice Letter Implementation, Design Elements, and Consolidation

For the proposed Advice Letters what, if any, additional implementation or program design elements should be addressed each Advice Letter. Do parties have recommendations on how to consolidate advice letters or make the process more efficient?

The Proposal establishes five advice letter vehicles. For clarity, UCAN lists each below, with the recommendations it implements:

[70] Less, Walker & Murphy (Lawrence Berkeley National Laboratory) and Fournier (UCLA), Electrical Service Panel Capacity in California Households with Insights for Equitable Building Electrification, 2024 ACEEE Summer Study on Energy Efficiency in Buildings (2024).

1. Tier 2 FSC Implementation AL (each large IOU; within 120 days of the Track 3 decision): Section 3 Recommendations 1 through 4 (the SDG&E Standard Offer implementation plan, for SDG&E only; recording and provision of service conductor capacity and demand load values; the Electric Rule 2 modifications; and the pre-upgrade flexible connection evaluation process); Section 4 Recommendation 1 (the Limited Power default-mitigation workflow and customer communications); Section 6 Recommendation 2 (the bridging-to-non-bridging transition plan); and Section 8 Recommendations 1 and 2 (RTP enrollment and data tracking).
2. Flex Connect AL (SCE and SDG&E; within one year): Section 4 Recommendation 2 (implementation plans for Variable Operating Envelope bridging offerings modeled on PG&E's Flex Connect, preceded by quarterly Energy Division updates and a six-month preview workshop).
3. Tier 2 Grid Edge DERMS AL (all three large IOUs): Section 4 Recommendation 4 (SCE and SDG&E implementation of ChargeBoost-like offering, established within six months of a Track 3 decision, explanation of any differences from PG&E's ChargeBoost, and each IOU's proposal for scaling beyond the first 1,000 customers).
4. Cybersecurity Implementation AL (all three large IOUs; following the two-workshop and informal comment process): Section 5 Recommendation 1(implementation of the SIO-CS baseline cybersecurity framework, with justification of any deviations).
5. Tier 2 Non-Bridging Solutions AL (joint PG&E/SCE filing within 90 days; PG&E for Flex Connect formalization): Section 6 Recommendations 1, 3, and 4 (durable non-bridging versions of existing flexible service connection offerings, Flex Connect tariffing and extension to load customers, and the non-bridging Standard Offer).

The Proposal has already consolidated these workstreams sensibly—the Tier 2 FSC Implementation AL alone bundles eight recommendations spanning four sections of the Proposal into a single filing per utility. UCAN supports that consolidation and recommends three refinements:

1. Energy Division should develop a common template for the FSC Implementation AL so that the three utilities' filings are structured identically, and elements that are necessarily uniform across the utilities—such as the Rule 2 alignment—should be filed jointly.
2. The Commission should resolve two internal tier-designation inconsistencies. The Flex Connect AL is described as a Tier 2 AL in the Proposal's executive summary but as a Tier 3 AL in Section 9;[71] and the Cybersecurity Implementation AL is described as a Tier 2 AL in the text of Section 9 but appears as the "Tier 3 Cybersecurity Implementation AL" in the timing sequence on the same page.[72] UCAN supports Tier 3 treatment for the Flex Connect AL, given the scale and novelty of the programs and consistent with the Tier 3 review Cal Advocates urged—and UCAN supported—for the abnormal-condition signaling use case earlier in this Track;[73] for the Cybersecurity Implementation AL, which follows two workshops and an informal comment cycle, Tier 2 treatment appears reasonable, but the designation should be made explicit. Relatedly, the Tier 2 designation of the Grid Edge DERMS AL is appropriate only because the major policy choice associated with that filing—whether the offering becomes the default mitigation for all residential EV customers

[71]Compare Proposal at 7 ("Implemented through a Tier 2 AL within one year of a Track 3 decision (Tier 2 Flex Connect AL)") with Proposal at 47 ("this proposal recommends that the Commission direct SCE and SDG&E within a Tier 3 AL, the Flex Connect AL").
[72]Compare Proposal at 51 (directing submission "through a Tier 2 AL (Tier 2 Cybersecurity Implementation AL)") with id. ("IOUs file Tier 3 Cybersecurity Implementation AL – 60 days after comments filed").
[73]Cal Advocates Comments on ACR (Dec. 19, 2025) at 4 (recommending that the IOUs "seek approval of an abnormal-condition import-limit signaling use case through Tier 3 Advice Letters"); UCAN Reply Comments on ACR at 7.

regardless of service size—would, under UCAN's recommendations, be decided by the Commission itself; if the Commission instead leaves that question to be proposed through the advice letter process, the scaling element warrants Commission-level disposition for the same reasons as the Flex Connect AL (see Part II.B).

3. Stakeholder review should be expanded. The Proposal already builds review into two vehicles (the Flex Connect AL's six-month preview workshop, and the Cybersecurity Implementation AL's two workshops and informal comment cycle) and UCAN does not recommend layering additional workshops onto advice letters whose deadlines are short and whose content largely executes requirements the decision itself will specify. For the remaining three vehicles (the Tier 2 FSC Implementation AL, the Tier 2 Grid Edge DERMS AL, and the Tier 2 Non-Bridging Solutions AL), a lighter mechanism achieves the same protection without stressing the 120-day, six-month, and 90-day clocks: require each IOU to serve its draft advice letter on the service list at least 21 days before filing and to accept informal comments, with Energy Division retaining discretion to notice a workshop where a draft reveals significant divergence from the decision's requirements. The filing deadlines themselves should not move; the review window runs within them.

As to program design elements, each AL should be required to address: uniform eligibility criteria consistent across the IOUs; standardized plain-language customer disclosures (including translated materials) describing the operating limits, term, exit rights, and rate options; the data tracking fields identified in response to Question 5; capacity-sharing allocation rules consistent with D.26-02-025's transparency and class-neutrality requirements;[74] curtailment and

[74]D.26-02-025 at 24–29 (Section 5.10) and Conclusions of Law 19–20 (capacity allocation methods must be transparent, may not disadvantage particular customer classes, and may not reduce an existing Standard Offer customer's capacity).

remediation protocols that begin with customer education, consistent with D.26-02-025's compliance approach;[75] dispute resolution procedures; and the interoperability and interface documentation requirements described in Part II.E.

D. Question 5: Measurement, Tracking, and Reporting of Costs and Benefits

Many of the Proposal's recommendations are premised on the goal of affordability and ratepayer savings from greater capacity utilization, speed to power, and deferral or avoidance of upgrade capital expenditure. To realize these goals, quantification of ratepayer costs and benefits will be necessary. For each recommendation how should the IOUs measure, track and report key costs and benefit metrics?

The Proposal's affordability case ultimately rests on quantification the record does not yet contain—a gap IREC repeatedly flagged.[76] UCAN recommends a uniform framework, applied per offering (Limited Power, Standard Offer bridging and non-bridging, Flex Connect and analogues, Grid Edge DERMS), standardized across the IOUs, reported publicly through the D.24-09-020 biannual reports and annual distribution planning filings, and reviewed by Energy Division:

1. Utilization and service metrics: enrollment and attrition by offering, customer class, and location; kW of connected and unlocked capacity; days from application to energization versus the counterfactual upgrade path; curtailment events, hours, and depth by season; and customer compliance rates.
2. Financial metrics: the engineering estimate of each avoided or deferred upgrade at the time of election (the same estimate produced in the evaluation required by Recommendation 4 of Section 3); program administration and enabling-technology costs, both utility- and

[75] D.26-02-025 at 41–47 (Sections 6.3.1–6.3.3) and Conclusions of Law 35–38 (AMI data as the default compliance-monitoring method; customer education as the first step in remediation of exceedances).

[76] Workshop Report at 21 (IREC, noting "there are currently limited cost data available"); IREC Reply Comments on ACR (Dec. 31, 2025) at 1–2 (recommending that the Commission require utility cost estimates for likely flexible connection use cases and unit cost estimates of the upgrades those use cases could avoid).

customer-side; incremental distribution revenue from earlier energization; and net rate-base impact.

3. Planning metrics: projects removed from or deferred within the GNA/DDOR and capital plans with attribution to flexible connections, and resulting forecast adjustments.
4. Customer protection metrics: for any RTP enrollment, realized bill impacts versus the prior rate, opt-out rates and timing, and enrollment demographics including disadvantaged community indicators.

Cost-efficiency should be assessed at the portfolio level, as D.26-02-025 concluded for the Standard Offer, but reported with project-level granularity so the Commission and parties can verify where value is created.[77]

E. Question 6: Coordination with the California Energy Commission

How should IOUs ensure the existence of bridging solutions, non-bridging solutions, or the change from a bridging solution to a non-bridging solution are timely communicated with the California Energy Commission for forecasting purposes?

Bridging solutions leave the underlying upgrade and load forecast intact; non-bridging solutions change both. The CEC's demand forecast should therefore see flexible connections as explicit load modifiers. UCAN recommends that the IOUs report, in the D.24-09-020 biannual reports and in their annual distribution planning filings served on the CEC: the MW under bridging and non-bridging arrangements by offering and location; new elections, conversions from bridging to non-bridging, and terminations during the period; and associated changes to forecast infrastructure need. The IOUs should align these submissions with the CEC's Integrated Energy Policy Report demand forecast data cycle, and conversions material to a planned project

[77] D.26-02-025 at 51–52 (Section 8); id., Ordering Paragraph 4 (requiring a report on costs, enabled consumption, cost-efficiency, and revenue-requirement effects by January 15, 2029).

should be flagged in the next scheduled submission rather than held for annual reporting. This uses existing reporting vehicles, imposes no new standalone filing, and gives the CEC a consistent three-IOU data set.

F. Question 7: Extension of the D.26-02-025 Standard Offer to SDG&E

The proposal recommends the Commission direct SDG&E to stand up a static FSC offering that is aligned with the requirements directed in D.26-02-025 for PG&E and SCE.

a. For SDG&E to implement this proposal, what, if any, modifications to the requirements directed in D.26-02-025 should the Commission consider?

UCAN, which represents residential and small business customers in San Diego, strongly supports directing SDG&E to stand up a static FSC Standard Offer aligned with D.26-02-025. This recommendation resolves the anomaly UCAN has pressed throughout this Track: SDG&E has taken the position that flexible connections answer "no near-term need" in its territory,[78] even while its own Electrification Impact Study filings forecast substantial secondary-system upgrade needs driven by imminent electrification load. D.26-02-025 already found that SDG&E's customers "are likely to encounter upstream distribution capacity constraints in the future," and created a motion pathway for extending the Standard Offer upon a showing of constraint.[79] The Proposal properly moots that motion practice by grounding the extension in this proceeding's distinct rationale—ratepayer savings and efficient utilization of the existing grid—rather than energization delay alone.[80] That distinction matters: the ratepayer benefit of a flexible connection does not depend on whether energization is delayed; it depends on whether a ratepayer-funded upgrade can be avoided or deferred. San Diego ratepayers, who pay among the

[78]Workshop Report at 8; see UCAN Workshop Report Comments at 3–5.
[79]D.26-02-025 at 10–13 & Finding of Fact 3.
[80]Proposal at 44.

highest electric rates in the nation, should not be excluded from those savings because their utility's energization queue happens to be short today.

1. Modifications to the Requirements of Ordering Paragraphs 1 Through 5

The Ruling asks what modifications to "the requirements directed in D.26-02-025," defined as Ordering Paragraphs 1 through 5, the Commission should consider for SDG&E.[81] The necessary modifications are few, and that is itself the central point: the completed PG&E/SCE implementation hands SDG&E a finished template. Taking the Ordering Paragraphs in turn:

1. Ordering Paragraph 1 (joint Tier 2 AL establishing the tariffed Standard Offer form agreement). Modify to direct an individual SDG&E filing—the Tier 2 FSC Implementation AL—on the Proposal's 120-day schedule rather than OP 1's 60 days, adopting the PG&E/SCE joint form agreement as its template. One substantive modification is warranted: eligibility. D.26-02-025 frames the Standard Offer as a bridging option for customers facing upstream capacity constraints that delay energization; consistent with this proceeding's affordability rationale, SDG&E's offering should be available wherever a flexible connection can avoid or defer a ratepayer-funded upgrade—including upgrades triggered within Rule 15 and 16 allowances—with the evaluation required by Section 3 Recommendation 4 supplying the screening mechanism. All substantive capacity-determination and load-control requirements should carry over without modification: minimum limited load profile granularity; capacity determined at the normal rating of the most constrained component, with no buffer value; profiles designed so that equipment remains within emergency ratings on a loss of control; the UL 3141 safe

[81] Ruling at 4 & n.3.

harbor, with allowance for mutually agreeable non-certified controls; customer-education-first compliance; and the queue-position protections.[82]

2. Ordering Paragraph 2 (Tier 1 AL modifying Tariff Rules 2 and 3). Direct SDG&E to adopt Rule 2 and Rule 3 modifications equivalent to Appendices D and E of D.26-02-025 by Tier 1 AL. This requirement is partially subsumed by Section 3 Recommendation 3, which already directs SDG&E to update its controlled load definition and align its Rule 2 with PG&E's; the Tier 2 FSC Implementation AL should identify any residual Rule 3 conforming changes so the two workstreams do not diverge.[83]
3. Ordering Paragraph 3 (Tier 2 AL to modify the Standard Form Agreement as necessary). Adopt without modification: SDG&E should hold the same authority, in consultation with Energy Division, to modify its form agreement as implementation experience accumulates.[84]
4. Ordering Paragraph 4 (January 15, 2029 report on costs, enabled consumption, cost-efficiency, and revenue-requirement effects). Retain the common January 15, 2029 date so the Commission receives a three-utility picture at once, with SDG&E's reporting period running from its offering's effective date; if that period proves too short for a meaningful cost-efficiency assessment, SDG&E should supplement in a later cycle rather than delay the common report.[85]
5. Ordering Paragraph 5 (Appendix C and Preliminary Capacity Assessment data in the D.24-09-020 biannual reports). Modify only the start date: SDG&E should begin reporting with

[82]D.26-02-025, Ordering Paragraph 1; id. at 22–24 (limited load profile granularity), 40–41 (no buffer value; emergency-rating design), 45–47 (UL 3141 safe harbor and non-certified controls), 41–47 (compliance approach), and 37 (queue-position protections).
[83]D.26-02-025, Ordering Paragraph 2 and Appendices D–E; Proposal at 45.
[84]D.26-02-025, Ordering Paragraph 3.
[85]D.26-02-025, Ordering Paragraph 4.

the first biannual report following the launch of its offering, using the same Appendix C data fields as PG&E and SCE so the three data sets are comparable.[86]

2. Additional Recommendations Beyond Ordering Paragraphs 1 to 5

Separate from the modifications Question 7(a) asks about, UCAN recommends three further measures—two drawn from other portions of D.26-02-025, and one from the Proposal itself—so that the San Diego offering launches whole rather than in stages:

1. Preliminary capacity assessment parity (D.26-02-025, Ordering Paragraph 7). Direct SDG&E to offer the "Step 0" preliminary capacity assessment formalized by Ordering Paragraph 7 on the same terms as PG&E and SCE. A Standard Offer is only as accessible as the capacity information that lets a customer decide whether to pursue it; without the power check, San Diego customers would face the offering blind.[87]
2. No memorandum account. The Commission denied memorandum-account treatment for PG&E and SCE because the Standard Offer formalizes a low-cost administrative practice. That conclusion applies with greater force to SDG&E, which inherits a completed template and two territories' implementation experience rather than developing the offering from scratch.[88]
3. Concurrent durable non-bridging version (Proposal, Section 6 Recommendation 4). This recommendation arises from the Proposal rather than from D.26-02-025, and UCAN discusses the durable non-bridging framework in Part II.D. SDG&E should file the durable non-bridging version of the Standard Offer in the same Tier 2 FSC Implementation AL as

[86] D.26-02-025, Ordering Paragraph 5 and Appendix C.
[87] D.26-02-025, Ordering Paragraph 7 and Section 10 (at 53–58).
[88] D.26-02-025 at 64 (declining to "provide authorization to record Standard Offer costs within memorandum accounts").

its bridging version. The Proposal's stated reason for initially excluding SDG&E from the durable non-bridging directive—that "SDG&E does not have any current bridging offerings to base a non-bridging option upon"—dissolves the moment the Commission directs the bridging Standard Offer here: both versions would be built from the same form agreement, capacity determinations, and control requirements, and filing them together avoids a second advice letter cycle a year later. Sequencing San Diego behind PG&E and SCE would leave UCAN's members last in line for the offering the Proposal identifies as carrying the greatest potential ratepayer benefit.[89]

None of this strains the 120-day schedule, precisely because SDG&E inherits a finished product: the joint PG&E/SCE Standard Offer advice letter — of which the Ruling takes official notice — the D.26-02-025 form agreement architecture, and two territories' implementation experience.[90]

G. Question 8: Hardware, Software, and Data Safeguards Against Proprietary Restriction

What hardware, software, or data sharing safeguards may be needed to ensure that customers can obtain a flexible connection without being restricted by proprietary arrangements?

Question 8 asks the right question, because the principal long-run threat to the affordability case is not technical failure but rent extraction: proprietary chokepoints at the device, communications, platform, or data layer that convert ratepayer-funded flexibility infrastructure into a private toll booth.[91] UCAN recommends safeguards at each layer:

[89]Proposal at 51 ("As SDG&E does not have any current bridging offerings to base a non-bridging option upon, this recommendation focuses on PG&E and SCE."); id. at 36.
[90]Ruling at 6 (proposing official notice of the "PG&E and SCE Joint Advice Letter Implementing the Standard Offer"); D.26-02-025, Ordering Paragraphs 1–3.
[91]UCAN Workshop Report Comments at 11–13; Universal Devices Comments on All-Party Workshop Report (Apr. 4, 2026) at 6–7.

1. Hardware: any NRTL-certified UL 3141 PCS from any manufacturer must qualify; no utility-specified proprietary gateways for customers below 1 MW; and local fail-safe control must remain functional without cloud connectivity or subscription renewal.
2. Software and communications: open, documented, non-exclusive DERMS and aggregator interfaces published on a defined timeline; protocol neutrality consistent with Rule 21's mutual-agreement provisions; and no per-device or per-signal fees charged to customers or aggregators for access to ratepayer-funded utility platforms.
3. Program structure: customers retain the right to satisfy flexible connection requirements through utility programs, CCA programs, third-party aggregators, OEM solutions, or self-managed equipment, as the Proposal states; no exclusive right for any single aggregator or vendor to manage all customers sharing a service transformer or secondary conductor; and switching providers must not require new utility studies or fees where the operating envelope is unchanged.
4. Data: customers (and their designees, via standardized authorization) must receive their own operating envelope schedules in the machine-readable UL 3141 Annex A format D.26-02-025 requires, along with the demand load and conductor capacity values described in Recommendation 2 of Section 3, so that any qualified provider can design against the same information the utility holds.

The Grid Edge DERMS workshops should treat the Proposal's own concern—ensuring devices beyond EV chargers "can be locally controlled to ensure rapid response and prevent ongoing access fees"[92]—as a design requirement, not a discussion topic.

[92]Proposal at 49.

H. Question 9: Safety Considerations

Are there any safety concerns that should be highlighted?

UCAN identifies no safety barrier to the Proposal's recommendations, and cautions against generalized safety objections being used to re-litigate them. The framework's safety case is layered and conservative: operating limits are derived from engineering evaluations that respect thermal, voltage, protection, and power quality criteria; envelopes default to firm capacity on communications loss;[93] D.26-02-025 requires limited load profiles to be designed so utility equipment remains within emergency ratings even if a customer on uncertified controls loses control entirely;[94] and UL 3141 certification provides NRTL-verified performance of the import-limitation function. The genuine safety gap in the record runs the other way: the Proposal documents that secondary conductor capacity is "not readily known to either the IOU or customer."[95] Recommendation 2 of Section 3—recording those values during engineering and design—is therefore itself a safety measure, and a further reason to adopt it.

IV. CONCLUSION

The Proposal reflects the record: flexible service connections are mature, deployed, and capable of saving ratepayers billions of dollars if the Commission requires the utilities to treat them as standard tools rather than perpetual pilots. UCAN urges the Commission to adopt the Proposal with the modifications described above—foremost, restructuring real-time pricing enrollment as opt-in, with customer protections under either enrollment design; completing the Grid Edge DERMS scaling framework and keeping the default-mitigation question with the Commission; closing the loop between avoided upgrades and utility capital plans; establishing a

[93] Proposal at 25–26, 29.
[94] D.26-02-025 at 41 (Section 6.2.5) & Conclusions of Law 32–33.
[95] Proposal at 17.

shared-savings pathway for durable non-bridging customers, and offering a non-bridging Standard Offer to SDG&E customers; and adopting binding interoperability protections. UCAN thanks the Assigned Commissioner, the Administrative Law Judge, and Energy Division staff for a proposal of notable clarity and ambition and looks forward to its prompt implementation.

Respectfully submitted,
/s/ Jane Krikorian

Jane Krikorian
Staff Attorney
Utility Consumers' Action Network
404 Euclid Avenue, San Diego, CA 92114
(619) 696-6966
jane@ucan.org

Dated: July 27th, 2026