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

Application of the California Market
Transformation Administrator (U-1399-E) for
Approval of the Second Tranche of Statewide
Energy Efficiency Market Transformation
Initiatives.

Application 26-07-004

RESPONSE OF SMALL BUSINESS UTILITY ADVOCATES TO APPLICATION

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August 6, 2026

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RESPONSE OF SMALL BUSINESS UTILITY ADVOCATES TO APPLICATION

I. INTRODUCTION

Pursuant to Rule 2.6 of the Commission’s Rules of Practice and Procedure, Small Business Utility Advocates (“SBUA”) submits this Response to the application of the California Market Transformation Administrator (“CalMTA”) for approval of the second tranche of statewide energy-efficiency market transformation initiatives (“Application”). SBUA generally supports cost-effective market transformation efforts and submits this Response to preserve its right to participate in and further analyze the issues presented.

II. SBUA’S BACKGROUND

SBUA is a 501(c)(3) non-profit organization with a mission “to represent, protect, and promote the interests of small business utility customers.” Supporting cost-effective energy-efficiency (“EE”) programs and measures that benefit small businesses while protecting against high program costs is squarely within SBUA’s mission as a ratepayer advocacy organization.¹

The interests of small business customers differ significantly from those of residential and large commercial customers. Yet individual small businesses generally lack the resources to

¹ See SBUA website at www.utilityadvocates.org.

participate directly in Commission proceedings and often go unrepresented. SBUA's participation helps ensure that the Commission considers the effects of its decisions on small business ratepayers, including in this proceeding.

III. SBUA'S INTERESTS IN THIS PROCEEDING

SBUA has a substantial interest in this proceeding. CalMTA's Application seeks authorization to spend \$81.772 million in additional EE ratepayer funds through 2031 and approval of a process for future Market Transformation Initiatives ("MTIs"). The requested funding would be drawn from amounts collected from customers of PG&E, SCE, SoCalGas, and SDG&E, including small business ratepayers.²

Although CalMTA states that the application does not request authority to increase rates, the proposal would nonetheless commit existing ratepayer funds that could otherwise support other initiatives. SBUA therefore has a substantial interest in ensuring that the proposed expenditures are reasonable and cost-effective and that the resulting initiatives are accessible to small business customers.

SBUA is particularly interested in the proposed Commercial Rooftop Units initiative and supports efforts to facilitate small businesses' adoption of high-efficiency heat-pump rooftop units.³ SBUA is also interested in the proposed Commercial Replacement and Attachment Window Solutions initiative, including evaluating whether small commercial buildings and small commercial tenants would have meaningful access to those benefits.⁴

Finally, SBUA has an interest in CalMTA's request to approve future MTIs through Tier

² Application at 25.

³ Application at 11-13.

⁴ Application at 9-11 (CalMTA initially proposes to focus on municipal, university, school, hospital, hospitality, and historic buildings, which raises questions about whether independently owned small businesses will receive a proportionate share of early program benefits).

2 advice letters.⁵ Future MTIs may commit substantial additional ratepayer funds, and any revised approval process should preserve adequate notice, transparency, and an opportunity for stakeholders to be heard.

Accordingly, SBUA intends to participate in all phases of this proceeding, including filing comments and briefs and participating in workshops (if held). SBUA may address issues raised by the Commission and other parties that could materially affect small commercial customers. To the extent that SBUA's interests overlap with other parties, SBUA will seek to collaborate with similarly situated parties. SBUA's participation will not prejudice any party or delay the proceeding.

SBUA does not oppose categorization of this proceeding as ratesetting and does not object to the proposed schedule at this time.

IV. SERVICE

Service of notices, orders, and other communications and correspondence in this proceeding should be directed to:

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Status: Information Only

⁵ Application at 17-20.

V. CONCLUSION

SBUA looks forward to participating in this proceeding to support cost-effective energy-efficiency measures and to ensure that CalMTA's proposals appropriately account for the interests of small business ratepayers.

Dated: August 6, 2026

Respectfully submitted,

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