

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



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Application of Pacific Gas and Electric
Company (U39E) for Approval of Electric
Rule No. 30 for Transmission-Level Retail
Electric Service.

A. 24-11-007
(Filed November 21, 2024)

**MOTION OF THE INDEPENDENT ENERGY PRODUCERS
ASSOCIATION FOR PARTY STATUS**

DOWNEY BRAND LLP
Brian T. Cragg
455 Market Street, Suite 1500
San Francisco, California 94105
Telephone: (415) 848-4800
Email: bcragg@DowneyBrand.com

Date: August 13, 2026

Attorneys for Independent Energy Producers Association

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In accordance with Rules 1.4 (a)(4), 1.4(b), and 11.1 of the Commission's Rules of Practice and Procedure, the Independent Energy Producers Association (IEP) respectfully moves for party status in Application (A.) 24-11-007.

I. COMPLIANCE WITH RULE 1.4 (b).

Rule 1.4 (b) provides that a person seeking party status by filing a motion to become a party shall:

- (1) fully disclose the persons or entities on whose behalf the filing, appearance or motion is made, and the interest of such persons or entities in the proceeding; and
- (2) state the factual and legal contentions that the person intends to make and show that the contentions will be reasonably pertinent to the issues already presented.

IEP is a nonprofit public benefit corporation formed under the laws of the State of California to encourage the development and use of independent electric supply resources. Its members collectively own and operate installed generating capacity and transmission infrastructure, and are responsible for producing and transporting reliable power to load-serving entities (LSEs), community choice aggregators (CCAs), and other electric service providers (ESPs) from generating resources like solar, wind, biomass, natural gas, geothermal, hydrogen, hydropower, and storage resources. IEP has been representing the interests of the developers and

operators of renewable and other independent electricity supply resources and transmission infrastructure before the Commission, other agencies, the Legislature, and the courts since 1982.

On June 18, 2026, the Federal Energy Regulatory Commission (FERC) issued a Show Cause Order under Section 206 of the Federal Power Act to the California Independent System Operator Corporation (CAISO) and other Participating Transmission Owners (PTOs). The Order requires CAISO and PTOs to explain “why their current tariffs remain just and reasonable in the absence of clear and consistent provisions for large load customers—or alternatively to propose changes.”¹ The Order directs CAISO to, among other things, show cause why its tariffs remain just and reasonable and not unduly discriminatory or preferential without provisions addressing the requirements applicable to customers seeking transmission service on behalf of large loads, additional transparency concerning the network upgrade costs to provide transmission service to customers on behalf of large loads, and service considerations applicable to co-location arrangements.

Pacific Gas and Electric Company’s (PG&E) present Application requests approval of its proposed Electric Rule 30, which addresses interconnection of new customers requesting retail electric service at transmission level voltages between 50 kilovolts (kV) and 230 kV. In light of FERC’s June 18, 2026 Order, Administrative Law Judge (ALJ) Garrett Toy issued a Ruling on August 7, 2026 noting that the Order presents topics that may interact with the issues scoped in this proceeding. The Ruling reopens the record of this proceeding so that parties may submit further comments on issues presented in the Order that relate to PG&E’s Application.

¹ Administrative Law Judge’s Ruling Seeking Comments on Proceeding Status, p. 5 (citing Fact Sheet: FERC Takes Action to Supercharge America’s Grid for Efficiency, Reliability, and a Bold Energy Future, June 18, 2026) (August 7, 2026).

IEP has a strong interest in this proceeding. If this motion is granted, IEP will address issues raised in ALJ Toy's August 7, 2026 Ruling and participate in the remainder of this proceeding. PG&E's proposed revisions to Electric Rule 30 and potential changes to the CAISO tariff prompted by FERC's June 18, 2026 Order may have significant impacts upon the operations of IEP members. IEP's legal and factual contentions will focus on the boundary between state and federal jurisdiction as it relates to PG&E's proposed Rule 30 and the Order and will attempt to ensure that the owners of independent generation and transmission facilities are not disadvantaged by Rule 30.

II. **PARTY REPRESENTATIVE AND SERVICE**

IEP respectfully requests that the service list include the following representative:

Brian T. Cragg
Downey Brand LLP
455 Market Street, Suite 1500
San Francisco, California 94105
Telephone: (415) 848-4800
Email: bcragg@DowneyBrand.com

III. **CONCLUSION**

IEP's participation will not delay the proceeding's schedule or broaden the scope of issues considered. For the reasons described above, IEP respectfully requests the Commission grant its motion and allow IEP to participate as a party in this proceeding.

Respectfully submitted this 13th day of August, 2026, at San Francisco, California.

DOWNEY BRAND LLP
Brian T. Cragg
455 Market Street, Suite 1500
San Francisco, California 94105
Telephone: (415) 848-4800
Email: bcragg@DowneyBrand.com

By /s/ Brian T. Cragg

Brian T. Cragg

Attorneys for Independent Energy Producers
Association