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R1807003

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

Order Instituting Rulemaking to Continue
Implementation and Administration, and Consider
Further Development, of California Renewables
Portfolio Standard Program.

R.18-07-003

**NOTICE OF EX PARTE MEETING
OF THE GREEN POWER INSTITUTE**

August 26, 2026

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NOTICE OF EX PARTE MEETING OF THE GREEN POWER INSTITUTE

Pursuant to Rule 8.4 of the Commission's Rules of Practice and Procedure, in the **Order Instituting Rulemaking to Continue Implementation and Administration, and Consider Further Development, of California Renewables Portfolio Standard Program**, R.18-07-003, the Green Power Institute, the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security (GPI), provides this *Notice of Ex Parte Meeting of the Green Power Institute*.

GPI hereby gives Notice of an Ex Parte meeting that took place between GPI and the Office of Commissioner Christine Harada on Monday, August 24, 2026, at 3:30 pm. The meeting was originally scheduled for 11:00 but due to a last-minute conflict was rescheduled until 3:30 pm. Gregg Morris represented GPI. Adam Buchholz, Advisor to Commissioner Harada, represented Commissioner Harada's office. We were joined by Seina Soufiani, Advisor to President Reynolds. The Ex Parte meeting took place over zoom.

The meeting focused on a discussion about PDs for two pending IComp requests from the Green Power Institute in R.18-07-003. The older of the two, 3½ years old (filed 2/10/23), is reduced by 64 percent, while the other, filed a year later on 2/16/24, is reduced by a whopping 83 percent. The extent of the deductions is completely unwarranted, arbitrary, and capricious. Like all of the PDs issued on July 8, these two PDs need to be completely reevaluated using established Commission standards.

We discussed some of the most unwarranted deductions that need to be reversed in the two PDs in R.18-07-003, including the following:

- A 50% reduction for the hours devoted to a technical working group organized and led by the Commission for which I was invited to participate as the technical expert and served on the organizing committee. Working group hours have always been fully compensated.

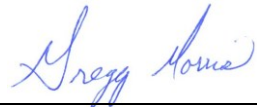
- A 60% reduction for “excessive” hours spent on reading and evaluating the tens-of-thousands of pages of RPS procurement plans submitted by the 40-odd LSEs. Our time was spent efficiently, and none of the hours should be deducted.
- A 75% reduction in hours on the basis that (1) a summation of our positions on a number of topics does not indicate that the positions did not enrich the record despite the fact that the summation automatically puts the material into the record underlying the Decision, and (2) because our suggestions did not lead to orders for changes in the procurement plans being considered for approval, even though the established standard for eligibility for compensation is whether they were considered, not whether they were adopted, as long as an overall contribution was acknowledged.
- A 100% reduction in hours devoted to a Resolution on the basis that the Resolution did not explicitly cite our contributions, despite the fact that the Resolution did adopt at least two of our contributions, and we were the only party that proposed these particular contributions.

In addition to discussing the unwarranted individual deductions in the two PDs in R.18-07-003, we also discussed the need to hold all 13 of the PDs issued on July 8 from the agenda for the September 3 Commission meeting, or at least the four PDs that are under Commissioner Harada’s purview. These decisions are long overdue, but that has to be balanced against the need for them to follow longstanding Commission practice in their evaluation, and confer fair treatment to the Green Power Institute.

Advisor Buchholz pledged to discuss the situation with Commissioner Harada.

Dated August 26, 2026.

Respectfully Submitted,



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