

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



FILED

Order Instituting Rulemaking on California
Advanced Electric Rate Design

Rulemaking 26-04-009 09/03/26
Filed April 9, 2026 08:00 AM

R2604009

CLEAN COALITION MOTION FOR PARTY STATUS

/s/ BEN SCHWARTZ

Ben Schwartz

Policy Director

Clean Coalition

1800 Garden Street

Santa Barbara, CA 93101

Phone: 626-232-7573

ben@clean-coalition.org

Dated: September 3, 2026

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I. INTRODUCTION

Pursuant to Rule 1.4(a)(4) of the Rules of Practice and Procedure of the California Public Utilities Commission (“the Commission”), Clean Coalition respectfully submits this motion for party status in the Order Instituting Rulemaking (“OIR”) on California Advanced Electric Rate Design, Rulemaking (“R”) 26-04-009.

II. DESCRIPTION OF PARTY

The Clean Coalition is a nonprofit organization whose mission is to accelerate the transition to renewable energy and a modern grid through technical, policy, and project development expertise. The Clean Coalition drives policy innovation to remove barriers to procurement and interconnection of Distributed Energy Resources (“DER”)—such as local renewables, demand response, and energy storage—and we establish market mechanisms that realize the full potential of integrating these solutions for optimized economic, environmental, and resilience benefits. The Clean Coalition also collaborates with utilities, municipalities, property owners, and other stakeholders to create near-term deployment opportunities that prove the unparalleled benefits of local renewables and other DER.

III. INTEREST IN PROCEEDING

The Clean Coalition has a substantial interest in this proceeding based on its longstanding work on electric rate design, demand flexibility, and the deployment and optimization of DER. Effective rate design can provide customers and DER with price signals that reflect changing grid conditions, encouraging electricity consumption during periods of abundant, low-cost energy while reducing or shifting consumption during periods of greater system need. The Clean Coalition seeks to participate in this proceeding to support rate structures and implementation mechanisms that provide meaningful price signals while advancing affordability, electrification, and efficient utilization of the electric grid.

The Clean Coalition has substantial experience addressing these issues before the Commission. In R.22-07-005, the Clean Coalition submitted testimony addressing residential fixed charges and alternative approaches to rate design. The Clean Coalition analyzed highly differentiated volumetric time-of-use (“TOU”) rates with greater variation between high- and low-cost periods and demonstrated that such rates could provide stronger incentives for beneficial electrification and load shifting than reliance on increased fixed charges. The Clean Coalition's analysis modeled a rate structure that significantly reduced off-peak prices while increasing prices during peak periods, demonstrating how stronger temporal differentiation can preserve revenue recovery while providing customers with a meaningful incentive to align electricity usage with grid conditions.

The Clean Coalition has also participated in the Commission's development of dynamic rate pilots and associated mechanisms for translating changing system conditions into retail electricity prices, including the development and implementation of the Price Machine for real-time pricing. This work has provided the Clean Coalition with experience concerning both the design of dynamic price signals and the practical considerations associated with enabling customers and flexible DERs to respond to those signals.

The Clean Coalition seeks party status to bring this rate-design, DER, and implementation experience to the issues under consideration in this proceeding. In particular, the Clean Coalition intends to evaluate whether proposed rate structures provide sufficiently differentiated and actionable price signals, appropriately reflect grid conditions and system costs, and enable flexible loads and DERs to reduce peak demand and shift consumption toward periods when electricity is abundant and lower-cost.

IV. NOTICE

Service of notices, orders, and other correspondence in this proceeding should be directed to the Clean Coalition as follows:

Ben Schwartz
Policy Director
Clean Coalition
1800 Garden Street
Santa Barbara, CA 93101
Phone: 626-232-7573

Email: ben@clean-coalition.org

If granted party status in this proceeding, the Clean Coalition requests email-only service in this proceeding.

V. CONCLUSION

The Clean Coalition's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the proceeding. For the reasons stated above, we respectfully request that the Commission approve this Motion and grant Clean Coalition party status in this proceeding.

Respectfully submitted,

/s/ BEN SCHWARTZ

Ben Schwartz

Policy Director

Clean Coalition

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Santa Barbara, CA 93101

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