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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company (U 39 E) for Approval of Electric Rule No. 30 for Transmission-Level Retail Electric Service.	A.24-11-007

CALIFORNIA COMMUNITY CHOICE ASSOCIATION OPENING COMMENTS ON ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENTS ON PROCEEDING STATUS

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SUMMARY OF RECOMMENDATIONS[1]

- Enacting the Partial Settlement proposed by PG&E, Cal Advocates, CalCCA, and Sierra Club and the data sharing provisions included therein will improve the ability to forecast large loads consistent with the goals of the FERC Order. The Commission should act expediently to adopt the Partial Settlement.

[1] Acronyms used herein are defined in the body of this document.

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California Community Choice Association[2] (CalCCA) submits these opening comments pursuant to the *Administrative Law Judge's Ruling Seeking Comments on Proceeding Status*[3] (Ruling), dated August 7, 2026, and the *Email Ruling Setting New Dates for Filing of Comments,*[4] dated August 25, 2026. The Ruling asks parties to submit comments on any potential overlap between PG&E's proposed Electric Rule 30 (Rule 30) and the Federal Energy Regulatory Commission Order to Show Cause (FERC Order) issued to the California Independent System Operator (CAISO) and Participating Transmission Owners (PTO).[5]

I. INTRODUCTION

The FERC Order highlights the importance of forecasting large loads and avoiding potential duplicative and speculative load.[6] Inaccurate forecasts increase the risks of shifting

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2 California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance of Southern California, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, Valley Clean Energy, and WestLight Energy.

3 *Administrative Law Judge's Ruling Seeking Comments on Proceeding Status,* Application (A.) 24-11-007 (Aug. 7, 2026), https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M613/K880/613880295.PDF.

4 *Email Ruling Setting New Dates for Filing of Comments*, A.24-11-007 (Aug. 25, 2026), https://apps.cpuc.ca.gov/apex/f?p=401:56::::RP,57,RIR:P5_PROCEEDING_SELECT:A2411007.

5 *Cal. Independent Sys. Operator Corp.*, 195 FERC ¶ 61,214 (2026). FERC Docket EL26-71-000 (FERC Order), https://elibrary.ferc.gov/eLibrary/docketsheet?docket_number=EL26-71-000.

6 *Id*. at 35-36, para. 55.

costs from large loads to existing ratepayers. The Partial Settlement Agreement of Pacific Gas and Electric (PG&E), The Public Advocates Office at the California Public Utilities Commission (Cal Advocates), CalCCA, and Sierra Club (Partial Settlement) submitted in this proceeding addresses these core issues by directing PG&E to share information, in accordance with the confidentiality protections set forth therein, regarding any new transmission interconnected load with any affected community choice aggregator (CCA).[7] CCAs are uniquely knowledgeable about large load development in their communities due to their relationships with local cities and counties. The information sharing envisioned by the settlement would further improve the ability of CCAs to contribute to the development of an accurate large load forecast.

CalCCA recommends that, consistent with the goals of the FERC Order, the Commission swiftly act on the Joint Motion for the Adoption of the Partial Settlement to ensure information sharing can immediately contribute to accurate load forecasts. To the extent that the Commission determines additional consideration of the FERC Order is required in this proceeding, that consideration should not delay approval of the Partial Settlement.

II. ADOPTING THE INFORMATION SHARING PARTIAL SETTLEMENT TERMS WILL ENABLE CALIFORNIA TO AVOID SPECULATIVE LOADS CONSISTENT WITH THE GOALS OF THE FERC ORDER

A. The FERC Order Identifies the Potential for Inaccurate Demand Forecasts to Shift Costs to Existing Ratepayers

On June 18, 2026, the FERC issued its long-awaited action on large loads which came in the form of Orders to Show Cause issued to the Regional Transmission Organizations and Independent System Operators, including CAISO. The FERC Order states that the CAISO existing tariff is "unjust, unreasonable, or unduly discriminatory or preferential" and directs CAISO and the PTOs to respond to the FERC Order.

One key concern emphasized by the FERC Order is the role of accurate forecasting of these new large loads. The FERC Order points out the role that PTOs, like PG&E, play in "managing the interconnection of load to the transmission system."[8] CAISO then "account[s] for state-projected additions of load in Transmission Planning Processes (TPP)."[9] As explained in

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7 *Joint Motion for Adoption of Partial Settlement Agreement of Pacific Gas and Electric Company (U 39 E), The Public Advocates Office, the California Community Choice Association, and Sierra Club,* A.24-11-007 (May 7, 2026) (Joint Motion), Att. 1, at 6, https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M606/K273/606273116.PDF.

8 FERC Order at 18, para. 21.

9 *Id*.

the FERC Order, "[t]he TPP is conducted annually and is highly integrated with state processes and forecasts, including the California Energy Commission's (CEC) development of a statewide electricity demand forecast and [California Public Utilities Commission's (Commission)] development of integrated resource plans."[10]

FERC is "concerned that CAISO's existing Tariff and/or the TO Tariffs fail to deter speculative or duplicative requests for transmission service by Eligible Customers on behalf of large loads."[11] Speculative load may drive a demand forecast, and therefore TPP, that is costlier than the minimum level required to serve new large loads. FERC is "likewise concerned that there may be speculative transmission service requests by Eligible Customers on behalf of large loads that could result in cost shifting among transmission customers."[12]

B. The Partial Settlement Would Enhance the Ability of CCAs to Validate Forecasts of New Loads

CCAs are active participants in the development of the CEC's Integrated Energy Policy Report (IEPR) demand forecast, a key input used to develop the TPP. CCAs draw on both their relationships with customers and their associations with city and county planning departments to determine the status of new facilities in their territory. CCA input is only one of the considerations in developing the IEPR forecast. The investor-owned utilities (IOU) also provide their own forecasts to the CEC. The IOU and CCA forecasts do not always match, and some CCAs report significant differences in IOU and CCA forecasts for the same territory. This suggests there is the potential for speculative load to be included in the forecast, impacting the TPP, and driving up ratepayer costs.

Among other terms included in the Partial Settlement, PG&E would be required to share the information it provides to the CEC on load inquiries to the affected CCA.[13] PG&E would also share with the CCA all applications for transmission level service[14] and periodic updates on those projects.[15] This information, in combination with the CCA information on permitting and siting received from associated cities and counties, would improve the ability of CCAs to provide forecast information to the CEC in the IEPR process. In particular, the information

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10 *Id*. at 18, para. 22.
11 *Id*. at 35, para. 35.
12 *Id*. at 50, para. 78.
13 Joint Motion, Att. 1, at 6.
14 *Id*. at 10.
15 *Id*. at 6-7.

would help CCAs to identify the drivers for any mismatch between CCA and IOU forecasts, enabling a recommendation to remove any speculative or uncertain load. The result will be more accurate IEPR forecasts better protecting existing customers from potential cost-shifts.

Requiring PG&E to begin the information sharing processes outlined in the Partial Settlement will directly address key concerns regarding accurate forecasting outlined in the FERC Order. The information sharing provisions provide an important check for speculative load and will protect ratepayers from cost increases for unnecessary infrastructure investments.

III. THE COMMISSION SHOULD NOT ALLOW ADDITIONAL CONSIDERATION OF RULE 30 IN LIGHT OF THE FERC ORDER TO DELAY IMPLEMENTATION OF INFORMATION SHARING

As noted by the Ruling, "[t]he Order presents topics that may interact with the issues scoped in this proceeding."[16] Given CalCCA's narrow focus in this proceeding on information sharing, these comments do not address any other potential overlap between the FERC Order and PG&E's proposed Rule 30. If the Commission determines that additional time is necessary to consider the proposed Rule 30, CalCCA urges the Commission to not let this delay approval of the Partial Settlement. As described above, the terms of the Partial Settlement will help to address key issues impacting forecasting large load demand. Resolving these issues should have no bearing on the issues related to transmission service, and the Commission should approve the Partial Settlement on an expedited timeframe.

IV. CONCLUSION

For all of the foregoing reasons, CalCCA recommends that if the Commission determines additional time is required to address the overlap of the FERC Order and Rule 30, the Commission adopt the Partial Settlement on an expedited timeframe.

Respectfully submitted,

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September 9, 2026

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[16] Ruling, at 9.