



Decision _____

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

JUL 12 2018

02:59 PM

Order Instituting Rulemaking to Consider New Approaches to Disconnections and Reconnections to Improve Energy Access and Contain Costs.

Rulemaking 18-07-005
(Filed July 12, 2018)

**INTERVENOR COMPENSATION CLAIM OF THE UTILITY REFORM NETWORK
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF THE UTILITY
REFORM NETWORK**

NOTE: After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD and supporting EXCEL spreadsheet to the Intervenor Compensation Program Coordinator at compcoordinator@cpuc.ca.gov.

Intervenor: The Utility Reform Network ("TURN")	For contribution to the Implementation of Decision (D.) 25-06-012 via Resolution (Res.) E-5468
Claimed: \$20,620.50	Awarded: \$
Assigned Commissioner: Darcie L. Houck	Assigned ALJ(s): Andrew Dugowson
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
Signature:	/S/
Date: 9/18/26	Submitted by: Hayley Goodson

PART I: PROCEDURAL ISSUES

(to be completed by Intervenor except where indicated)

A. Brief description of Decision:	In Res. E-5468 , the Commission approved with modifications the joint request of Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric Company (SDG&E), and Southern California Gas Company (SoCalGas) to adjust the temperature thresholds that halt disconnections pursuant to Decision (D.) 25-06-012. D.25-06-012 had required the IOUs to convene a collaborative process with stakeholders and submit a Tier 3 Advice Letter (AL) detailing their plans
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	and timeline for implementation of the additional disconnection safeguards for extreme heat events. This claim is limited to TURN's work contributing to the implementation of D.25-06-012 through Res. E-5468. TURN does not include any time for our efforts that culminated in the adoption of D.25-06-012. TURN expects to seek compensation for time preceding the issuance of D.25-06-012 in a separate request for intervenor compensation.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	8/15/2018	
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	9/14/2018	
4. Was the NOI timely filed?		
Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	I.15-08-019	
6. Date of ALJ ruling:	11/8/17	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
Showing of "significant financial hardship" (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	I.15-08-019	
10. Date of ALJ ruling:	11/8/17	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		

¹ All statutory references are to California Public Utilities Code unless indicated otherwise.

	Intervenor	CPUC Verification
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	Res. E-5468	
14. Date of issuance of Final Order or Decision:	7/20/26	
15. File date of compensation request:	9/18/26	
16. Was the request for compensation timely?		

C. Additional Comments on Part I: (use line reference # as appropriate)

#	Intervenor's Comment(s)	CPUC Discussion

PART II: SUBSTANTIAL CONTRIBUTION
(to be completed by Intervenor except where indicated)

A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059): (For each contribution, support with specific reference to the record.)

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
1. TURN contributed to the Commission's adoption of the CalHeatScore (CHS) metric, which accounts for relative heat risks, and the CHS Level 2 threshold to determine when disconnections should be halted. TURN was a very active participant in the working group process convened by the IOUs in compliance with D.25-06-012. From the outset of that process, TURN advocated the use of criteria in addition to temperature to account for other components of extreme	- Attachment 3 - SCE AL 5707-E et al., 12/17/25, Attachment A, Summary of Party Positions; Attachment B-3, TURN Informal Feedback on IOU Proposal for Extreme Heat Disconnection Protections, 10/20/25, pp. 3-4; Attachment C-2, TURN Informal Feedback on 11/12/25 Working Group Meeting - Attachment 3 - SCE AL 5707-E et al., 12/17/25, pp. 5-6 (recommending use of CalHeatScore index)	

proposed Level 3 in SCE AL 5707 et al., despite TURN's earlier calls for analysis of the impacts of Level 3 versus a lower impact level. TURN (and others) protested this proposal. TURN recommended that the Commission direct the IOUs to present an analysis estimating the relative impacts of using CalHeatScore Level 2 or Level 3 compared to the current 100-degree threshold. TURN cautioned that without this analysis, the Commission could not assume that use of Level 3 would achieve the reduction in relative heat risks intended by D.25-06-012. In Resolution E-5468, the Commission agreed with TURN et al. that the IOUs unreasonably failed to provide data or analysis to support their CalHeatScore Level 3 proposal. The Commission adopted a Level 2 threshold based on its own analysis, finding that this lower threshold is more consistent with the Commission's intent in D.25-06-012. Furthermore, the Commission modified Draft Res. E-5468 at the urging of TURN et al., to acknowledge that the CalHeatScore application programming interface (API) was released on May 21, 2026, and direct the IOUs to begin implementation of CHS Level	p. 5 (recommending against use of CalHeatScore Level 3 without comparing its impact to Level 2) *Note: This document is already in the record of R.18-07-005 as an attachment to the Joint Consumer Advocates' Emergency Motion filed 5/28/26. TURN additionally attaches it to this claim to avoid confusion with other references to the 5/28/26 Emergency Motion. • Res. E-5468, pp. 11-12 (requiring use of Level 2 threshold) • Attachment 7 - Joint Consumer Advocates Comments on Draft Resolution E-5468, 6/29/26, pp. 3-4 • Draft Res. E-5468, Rev. 1 (REDLINE), pp. 12-13, 14-15; Ordering Paragraph 1	
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2 within 6 months of the adoption of the final resolution.	• Res. E-5468, pp. 12, 14-15; Ordering Paragraph 1	
2. TURN contributed to the Commission’s determination that the interim statewide temperature threshold for heat-related disconnection protections should be set at 90°F. In SCE AL 5707-E et al., the Joint IOUs proposed to retain the existing statewide 100°F temperature threshold for suspending disconnections until the CalHeatScore (CHS) index became available for use. TURN protested this approach, instead recommending that the Commission approve an interim and “fallback” statewide temperature threshold of 90°F or, alternatively, no higher than 95°F, until the CHS data interface is available. TURN pointed to the Commission’s requirement in D.25-06-012 for a lower threshold to increase protections, widespread support among the working group members for a lower threshold (including TURN) as shown in the working group members’ written feedback attached to SCE AL 5707-E, and alignment with other extreme heat standards. As summer was fast approaching without any Commission action on SCE AL 5707-E, TURN again urged the Commission to immediately adopt an interim and “fallback”	• Attachment 4 - TURN Protest of SCE AL 5707-E et al., 1/6/26, pp. 1-4 (citing, in part, to TURN’s analysis and recommendations presented during the working group process, which the Joint IOUs’ attached to SCE AL 5707-E) • Attachment 3 - SCE AL 5707-E et al., Attachment C-2, TURN Informal Feedback on 11/12/25 Working Group Meeting • Joint Consumer Advocates Emergency Motion to Modify Weather Related Disconnection Protections to Better Address “Extreme Heat” Health and Safety Risks, 5/28/26, pp. 5-8 • Res. E-5468, pp. 10-11; Findings and Conclusions #2, 3, 11, 13; Ordering Paragraph 2	

90°F temperature threshold in the “Emergency Motion” filed by TURN, CforAT, NCLC, and UCAN on May 28, 2026. In Resolution E-5468, the Commission recounted data provided in TURN’s protest about the variation in extreme heat thresholds in different parts of California, making a threshold of 90°F appropriately protective. The Commission found the proposal to lower the threshold from 100 to 90 degrees as a backstop threshold when CHS data is unavailable, offered by TURN (and UCAN, CforAT, and NCLC), to be reasonable and adopted it effective immediately. Furthermore, the Commission modified the Draft Res. E-5468 at the urging of TURN et al., to clarify that the IOUs must implement the interim threshold of 90°F immediately.	• Attachment 7 - Joint Consumer Advocates Comments on Draft Resolution E-5468, 6/29/26, p. 3 • Draft Res. E-5468, Rev. 1 (REDLINE), pp. 10, 14-15; Ordering Paragraph 2 • Res. E-5468, pp. 10, 14-15; Ordering Paragraph 2	
3. TURN contributed to the Commission’s change of course in processing the Joint IOUs’ extreme heat protections advice letter, which resulted in the new protections being in effect this summer instead of further delays. On April 20, 2026, the Joint IOUs sent a letter to Commission Executive Director Leuwam Tesfai,	• Attachment 5 - Joint IOU Letter Requesting Extension of Time to Comply with D.25-06-012, 4/20/26 • Attachment 6 - Meeting Request Form Submitted by TURN to the Office of Commissioner Houck, 4/29/26 • Joint Consumer Advocates Emergency Motion to Modify Weather Related Disconnection	

requesting an extension of time to comply with D.25-06-012, specifically the requirement that the IOUs implement by May 1, 2026, the new extreme heat disconnection protections expected to result from the Joint IOU Tier 3 Advice Letter process ordered by D.26-05-012. As the IOUs explained, they timely submitted SCE AL 5707-E et al. on December 17, 2025. Then on April 17, 2026, the Commission requested that they withdraw their Joint AL and re-submit it with a new proposal. They explained that they would be unable to meet the mandated May 1, 2026, implementation timeline because the Commission had yet to issue a Draft Resolution and in fact had directed them to re-submit a revised Joint AL. After learning from the IOUs' letter that a Draft Resolution was not forthcoming, TURN requested an ex parte meeting with Assigned Commissioner Houck's Office to discuss the delay in implementing extreme heat disconnection protections. TURN cited the Joint IOUs' extension request, and specifically the commission's request that the Joint IOUs re-submit a revised proposal. TURN and CforAT attended this meeting on April 30, 2026. On May 28, 2026, TURN and our consumer advocate allies filed an emergency motion, asking the Commission to immediately modify the	Protections to Better Address "Extreme Heat" Health and Safety Risks, 5/28/26 • Joint Consumer Advocates Motion to Shorten Time to Respond to the Emergency Motion on Extreme Heat, 5/28/26 • E-Mail Ruling Partially Granting Motion for Expedited Comment Period, 6/3/26 • Res. E-5468, Findings and Conclusions #3 (citing the TURN et al. Emergency Motion); Ordering Paragraph #2 (adopting a 90°F interim threshold effective immediately)	
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weather-related disconnection protections to provide relief during the summer. TURN et al. recommended the adoption of a 90°F temperature threshold for suspending disconnections as an interim measure, while the Commission considers a more complex system for protecting consumers based on relative heat risk. To support expedited action, TURN et al. filed a motion to shorten time for responses to the emergency motion, which the Commission granted in part. The Commission promptly responded to TURN et al.'s appeal for expedited action. Rather than issue a ruling adopting the proposed interim 90°F temperature threshold, the Commission issued Draft Resolution E-5468 on June 22, 2026, and adopted final Resolution E-5468 at the Commission's July 16, 2026 meeting. The Commission ordered the new interim fallback threshold to take effect immediately upon adoption of the final Resolution, thus ensuring the interim disconnection protections would be in place for the remainder of the 2026 summer.		
4. TURN contributed to the Commission's requirement that the IOUs include a summary of costs to implement the CalHeatScore in their first Tier 1 AL compliance filing.	• Attachment 4 - TURN Protest of SCE AL 5707-E et al., 1/6/26, pp. 5-6 • Attachment 7 - Joint Consumer Advocates Comments on Draft	

In TURN's protest to SCE AL 5707-E et al., TURN raised a concern about the lack of transparency surrounding the cost of CHS implementation and suggested the Commission should require the IOUs to provide a forecast of these costs. When Draft Res. E-5468 declined to address TURN's concern about implementation costs, TURN et al. recommended that the Commission modify the Draft Resolution to require the IOUs to report CHS implementation costs in their first Tier 1 compliance advice letter. In Res. E-5468, the Commission adopted this requirement.	Resolution E-5468, 6/29/26, pp. 4-5 • Draft Res. E-5468, Rev. 1 (REDLINE), pp. 14-15; Ordering Paragraph 4 • Res. E-5468, pp. 14-15; Ordering Paragraph 4	
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: Center for Accessible Technology (CforAT), National Consumer Law Center (NCLC), Utility Consumers' Action Network (UCAN)		
d. Intervenor's claim of non-duplication: From the outset of the working group process through the submission of comments on Draft Resolution E-5468, TURN took a leadership role in seeking to build consensus and/or alignment among the other intervenors with similar enthusiasm for expediting the adoption of extreme heat disconnection protections. The parties with whom TURN's interests were most aligned, thus warranting close coordination to avoid duplication, included CforAT, NCLC, and UCAN. TURN's contributions are distinguishable from and		

complementary to those of other parties with similar interests. For instance, at the second working group meeting, TURN was the only party to develop and present an alternative to the IOUs’ proposal. TURN’s alternative proposal was informed by TURN’s unique research and analysis and included the combination of a lower interim and “fallback” statewide temperature threshold, as well as a second criteria, such as CalHeatScore. TURN’s alternative proposal influenced the working group’s ongoing discussions and ultimately the IOUs’ decision to propose CalHeatScore in their Joint AL, SCE AL 5707-E et al. TURN also offered unique implementation recommendations in its protest to SCE AL 5707-E et al. After the suspension of the IOUs’ Joint AL, TURN requested an ex parte meeting with Commissioner Houck and collaborated with CforAT in preparations for and participation in the ex parte meeting. TURN then took the lead on drafting the Joint Consumer Advocates’ Emergency Motion and Motion to Shorten Time, coordinating with parties to minimize their efforts and gather support. Finally, TURN took the lead on preparing the Joint Consumer Advocates’ Comments on Draft Res. E-5468, successfully proposing modifications to the resolution. The Commission should find that TURN’s participation was efficiently coordinated with the participation of other intervenors so as to avoid undue duplication and to ensure that to the extent duplication occurred, it served to supplement, complement, or contribute to the showing of the other intervenors. As such, the Commission should determine that all of TURN’s work is compensable consistent with the conditions set forth in Section 1802.5.	
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C. Additional Comments on Part II: (use line reference # or letter as appropriate)

#	Intervenor’s Comment	CPUC Discussion

PART III: REASONABLENESS OF REQUESTED COMPENSATION
(to be completed by Intervenor except where indicated)

A. General Claim of Reasonableness (§ 1801 and § 1806) to be completed by Intervenor:

	CPUC Discussion
a. Intervenor’s claim of cost reasonableness: TURN’s request for intervenor compensation seeks an award of	

	CPUC Discussion
approximately \$21,000 as the reasonable cost of our participation in the implementation of D.25-06-012, resulting in Res. E-5468. TURN submits that these costs are reasonable in light of the importance of the issues TURN addressed. Resolution E-5468 addressed important issues related to disconnections, specifically the adoption of new disconnection protections to reduce health and safety risks associated with extreme heat. The Commission’s disconnection protections have profound effects on many utility customers in California. Often times these policies are the only reasons that some customers are able to keep their lights on and continue to receive essential utility services. As such, the Commission should treat this compensation request as it has treated similar past requests with regard to the difficulty of establishing specific monetary benefits associated with TURN’s participation (or that of another intervenor). (<i>See, e.g.</i> D.21-08-033, D.23-06-053, D.24-04-030, and D.25-06-064 (awarding TURN intervenor compensation for contributions to prior orders in this proceeding addressing policies intended to reduce disconnections for nonpayment).) For these reasons, the Commission should find that TURN's efforts have been productive and the requested amount of compensation is reasonable in light of the benefits achieved through those efforts.	
b. Reasonableness of hours claimed: This request for compensation includes approximately 60 hours of substantive time devoted by TURN’s staff to the implementation of the requirements in D.25-06-012 related to extreme heat disconnection protections, which culminated in Resolution E-5468. This time, equivalent to 1½ weeks of full-time work, covers TURN’s (1) active participation in the working group process, including meeting attendance, development of TURN’s alternative to the IOUs’ proposal, and preparation of written comments following the second and third working group meetings; (2) preparation of TURN’s protest to SCE AL 5707-E et al.; (3) participation in the ex parte meeting with Commissioner Houck regarding delays in the implementation of D.25-06-012; (4) primary drafting of the Joint Advocates’ Emergency Motion and Motion to Shorten Time; and (5) primary drafting of the Joint Advocates’ Comments on Draft Res. E-5468. TURN assigned this proceeding to TURN Managing Attorney Hayley Goodson, who had prepared TURN’s original 8/14/24 emergency motion seeking the adoption of extreme heat disconnection protections amidst multiple heat waves in 2024, and which initiated the process that resulted	

	CPUC Discussion
in D.25-06-012. Ms. Goodson thus brought subject matter expertise to this assignment. TURN also assigned TURN Energy & Climate Policy Analyst Sylvie Ashford. Ms. Ashford took the lead on TURN's advocacy under the supervision of Ms. Goodson, including representing TURN in the working group process, coordinating with other stakeholders, and preparing all informal and formal workproduct presented by TURN. Given Ms. Ashford's lower billing rate, this staffing approach significantly reduced the costs of TURN's participation. TURN submits that the Commission should find that the hours TURN spent were reasonable given TURN's productivity and substantial contribution. However, should the Commission believe that more information is needed or that a different approach to discussing the reasonableness of the requested hours is warranted here, TURN requests the opportunity to supplement this section of the request.	
c. Allocation of hours by issue: The work included in this claim addressed a single issue, the adoption of extreme heat disconnection protections pursuant to the process and guidance provided in D.25-06-012. For this reason, 100% of TURN's time is coded "Heat" with the exception of time devoted to preparing this request for compensation, which is coded "Comp".	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Hayley Goodson, TURN Attorney	2025	1.25	\$705.00	D.25-07-034	\$881.25			
Hayley Goodson, TURN Attorney	2026	2.75	\$730.00	D.26-06-028	\$2,007.50			
Sylvie Ashford, Energy Policy Analyst	2025	24.20	\$265.00	D.26-04-019	\$6,413.00			

CLAIMED						CPUC AWARD		
Sylvie Ashford, Energy Policy Analyst	2026	30.75	\$285.00	Res. ALJ-393; See Comment 1	\$8,763.75			
<i>Subtotal: \$18,065.50</i>						<i>Subtotal: \$</i>		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
[Person 1]								
[Person 2]								
<i>Subtotal: \$</i>						<i>Subtotal: \$</i>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Hayley Goodson, TURN Attorney	2026	7.00	\$365	½ of 2026 Rate	\$2,555.00			
<i>Subtotal: \$2,555.00</i>						<i>Subtotal: \$</i>		
COSTS								
#	Item	Detail			Amount	Amount		
1.								
2.								
<i>Subtotal: \$</i>						<i>Subtotal: \$</i>		
TOTAL REQUEST: \$20,620.50						TOTAL AWARD: \$		
*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award. **Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate								

CLAIMED			CPUC AWARD
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ²	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Hayley Goodson	December 2003	228535	No

C. Attachments Documenting Specific Claim and Comments on Part III³:
(Intervenor completes)

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	TURN Attorney and Expert Hours
Attachment 3	Joint IOU Tier 3 Advice Letter Proposing Extreme Heat Disconnection Protections, SCE Advice Letter 5707-E et al., 12/17/25
Attachment 4	TURN Protest to SCE Advice Letter 5707-E et al., 1/6/26. *TURN notes that this document is already in the record of R.18-07-005 as it was attached to the Emergency Motion of the Joint Consumer Advocates to Modify Weather-Related Disconnection Protections to Better Address “Extreme Heat” Health and Safety Risks, 5/28/26. TURN attaches it separately to this claim to avoid confusion with other references to the Emergency Motion.
Attachment 5	Joint IOU Request for Extension of Time to Comply with D.25-06-012, 4/20/26
Attachment 6	Meeting Request Form Submitted by TURN to the Office of Commissioner Houck, 4/29/26
Attachment 7	TURN et al. Comments on Draft Resolution E-5468, 6/29/26
Comment 1	2026 Rate for Sylvie Ashford TURN requests that the Commission adopt a 2026 hourly rate of \$285 for TURN Energy Policy Analyst Sylvie Ashford. This rate is equal to the rate authorized by the Commission in D.26-04-019 for Ms. Ashford’s work in 2025, \$265, adjusted by both (1) the annual escalation rate of 3.35% for 2026 and (2) the second 5% step increase for Ms. Ashford in the Public Policy Analyst – Level II experience tier. Calculation: \$265 x [1.0335 (COLA) + 0.05 (step increase)] = \$287.13, rounded to \$285.

² This information may be obtained through the State Bar of California’s website at <https://apps.calbar.ca.gov/attorney/LicenseeSearch/QuickSearch>.

³ Attachments not attached to final Decision

Attachment or Comment #	Description/Comment

D. CPUC Comments, Disallowances, and Adjustments (CPUC completes)

Item	Reason

PART IV: OPPOSITIONS AND COMMENTS
Within 30 days after service of this Claim, Commission Staff
or any other party may file a response to the Claim (*see* § 1804(c))

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	
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If not:

Party	Comment	CPUC Discussion

(Green items to be completed by Intervenor)

FINDINGS OF FACT

1. THE UTILITY REFORM NETWORK [has/has not] made a substantial contribution to IMPLEMENTATION OF D.25-06-012 VIA RESOLUTION E-5468.
2. The requested hourly rates for THE UTILITY REFORM NETWORK's representatives [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.

3. The claimed costs and expenses [, as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$_____.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. **THE UTILITY REFORM NETWORK** is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay **THE UTILITY REFORM NETWORK** the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **THE UTILITY REFORM NETWORK** their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated. If such data are unavailable, the most recent [industry type, for example, electric] revenue data shall be used.”] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of **THE UTILITY REFORM NETWORK**’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	Implementation of D.25-06-012 via Resolution E-5468		
Proceeding(s):	R.18-07-005		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
THE UTILITY REFORM NETWORK	9/18/26	\$20,620.50		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Hayley	Goodson	Attorney	\$705	2025	
Hayley	Goodson	Attorney	\$730	2026	
Sylvie	Ashford	Expert	\$265	2025	
Sylvie	Ashford	Expert	\$285	2026	

(END OF APPENDIX)

ATTACHMENT 2

TURN Attorney and Expert Hours

R.18-07-005 (Disconnections OIR): TURN Compensation Claim - 9/18/26 - Time Sheets

Staff	Case #	Final Code	Description	Date	Time
Hayley Goodson	R18-07-005	Heat	advise Sylvie re extreme heat working group	9/9/25	0.25
Hayley Goodson	R18-07-005	Heat	confer with Sylvie on working group proposal from TURN	10/9/25	0.25
Hayley Goodson	R18-07-005	Heat	review and provide feedback on Sylvie's draft informal comments providing feedback on IOU extreme heat proposal	10/20/25	0.25
Hayley Goodson	R18-07-005	Heat	advise Sylvie on working group participation	10/30/25	0.25
Hayley Goodson	R18-07-005	Heat	review and respond to Sylvie's report from last working group meeting and proposed informal comments re IOU revised proposal	11/14/25	0.25
Hayley Goodson	R18-07-005	Heat	review Sylvie's draft protest to Joint IOU AL re extreme heat protections to provide feedback	1/6/26	1.50
Hayley Goodson	R18-07-005	Heat	review next draft of Sylvie's protest and provide feedback	1/6/26	0.25
Hayley Goodson	R18-07-005	Heat	advise Sylvie re strategy for meeting with assigned comm'r and staff re extreme heat protections	4/28/26	0.25
Hayley Goodson	R18-07-005	Heat	meet with Sylvie to discuss motion for interim relief	5/19/26	0.25
Hayley Goodson	R18-07-005	Heat	review draft emergency motn and motn to shorten time from Sylvie and provide feedback re same	5/20/26	0.50
Hayley Goodson	R18-07-005	Comp	prepare intervenor compensation request	9/17/26	5.25
Hayley Goodson	R18-07-005	Comp	prepare intervenor compensation request	9/18/26	1.75
Sylvie Ashford	R18-07-005	Heat	Review D2506012 mandate to lower disconnections temperature threshold to assess potential participation	8/15/25	0.25
Sylvie Ashford	R18-07-005	Heat	Prep for working group meeting by reviewing slides, decision, and updates on heat tools	8/28/25	0.75
Sylvie Ashford	R18-07-005	Heat	Participate in 8.28 working group meeting on extreme heat thresholds	8/28/25	1.00
Sylvie Ashford	R18-07-005	Heat	Synthesize learnings from first working group meeting, draft position and identify additional research questions	8/28/25	0.75
Sylvie Ashford	R18-07-005	Heat	Prep for meeting with UCAN on extreme heat thresholds by reviewing previous case filings	9/10/25	0.25
Sylvie Ashford	R18-07-005	Heat	Discuss extreme heat threshold options with TS of UCAN and coordinate research steps to avoid duplication	9/11/25	1.00
Sylvie Ashford	R18-07-005	Heat	Review IOU slides outlining proposal for new extreme heat thresholds	10/8/25	0.50
Sylvie Ashford	R18-07-005	Heat	Research extreme heat thresholds in jurisdictions nationwide	10/8/25	1.25
Sylvie Ashford	R18-07-005	Heat	Brainstorm potential alternative proposals based on latest information	10/9/25	0.75
Sylvie Ashford	R18-07-005	Heat	Outline alternative proposal for HGoodson review	10/9/25	0.25
Sylvie Ashford	R18-07-005	Heat	Discuss alternative proposal and WG strategy with HGoodson	10/9/25	0.25
Sylvie Ashford	R18-07-005	Heat	Compose slides outlining feedback on IOU proposal and alternative proposal	10/9/25	1.50
Sylvie Ashford	R18-07-005	Heat	Call with UCAN to discuss feedback and counterproposals to IOUs extreme heat proposal	10/10/25	0.50
Sylvie Ashford	R18-07-005	Heat	Prepare to present proposal in WG meeting 2	10/10/25	0.50
Sylvie Ashford	R18-07-005	Heat	Participate in Extreme Heat WG meeting 2	10/10/25	1.00
Sylvie Ashford	R18-07-005	Heat	Clarify TURN proposal details for CforAT, NCLC and coordinate responses to IOU proposal	10/17/25	0.50
Sylvie Ashford	R18-07-005	Heat	Update research on other state extreme heat thresholds	10/17/25	0.75
Sylvie Ashford	R18-07-005	Heat	Draft informal comments summarizing feedback on IOU proposal and recommendations	10/20/25	2.50
Sylvie Ashford	R18-07-005	Heat	Correspond with and respond to feedback from HGoodson on informal feedback to IOU proposal	10/20/25	0.25
Sylvie Ashford	R18-07-005	Heat	Analyze other party feedback on IOU and TURN proposals	10/20/25	0.50
Sylvie Ashford	R18-07-005	Heat	Discuss coordination with CforAT, NCLC, other parties to request an additional WG meeting	10/21/25	0.25
Sylvie Ashford	R18-07-005	Heat	Correspond with working group facilitators to request additional meeting	10/30/25	0.25
Sylvie Ashford	R18-07-005	Heat	Correspond with HGoodson re next steps in extreme heat working group	10/30/25	0.10
Sylvie Ashford	R18-07-005	Heat	Review UCAN draft extreme heat thresholds proposal and provide feedback	11/5/25	0.25
Sylvie Ashford	R18-07-005	Heat	Coordinate with HGoodson strategy for next WG meeting on extreme heat threshold proposals	11/6/25	0.25
Sylvie Ashford	R18-07-005	Heat	Review advance materials and updated IOU proposal for third extreme heat WG meeting	11/12/25	0.50
Sylvie Ashford	R18-07-005	Heat	Participate in third extreme heat WG meeting 11.12.25	11/12/25	1.00
Sylvie Ashford	R18-07-005	Heat	Correspond with CforAT to coordinate responses to IOU proposal and provide feedback on CforAT proposal	11/17/25	0.25
Sylvie Ashford	R18-07-005	Heat	Correspond with UCAN to coordinate responses to updated IOU proposal	11/17/25	0.25
Sylvie Ashford	R18-07-005	Heat	Incorporate HGoodson comments and finalize informal feedback on updated IOU proposal from WG meeting 3	11/17/25	0.50
Sylvie Ashford	R18-07-005	Heat	Share informal feedback on updated IOU proposal from WG meeting 3 with working group	11/17/25	0.10
Sylvie Ashford	R18-07-005	Heat	Review other party informal feedback submitted to working group	11/17/25	0.25
Sylvie Ashford	R18-07-005	Heat	Correspond with ATinnin to discuss equity impacts of CalHeatScore tool	11/20/25	0.25
Sylvie Ashford	R18-07-005	Heat	Correspond with ATinnin to discuss methodological questions and concerns with the CalHeatScore tool	11/21/25	0.50
Sylvie Ashford	R18-07-005	Heat	Analyze CalHeatScore methodology document re assessing risk in zip codes with sparse public health data	11/21/25	1.00

R.18-07-005 (Disconnections OIR): TURN Compensation Claim - 9/18/26 - Time Sheets

Staff	Case #	Final Code	Description	Date	Time
Sylvie Ashford	R18-07-005	Heat	Review Joint IOUs appendix summary of working group meetings and party positions	12/3/25	0.25
Sylvie Ashford	R18-07-005	Heat	Draft edits to Joint IOUs appendix summary of working group meetings and party positions	12/3/25	0.25
Sylvie Ashford	R18-07-005	Heat	Preliminary review of IOUs joint advice letter proposal for extreme heat disconnections protections	12/17/25	0.50
Sylvie Ashford	R18-07-005	Heat	Correspond with team re response to IOUs joint advice letter	12/17/25	0.25
Sylvie Ashford	R18-07-005	Heat	Discussion w/HGoodson re strategy for protest to IOUs extreme heat proposal	12/18/25	0.25
Sylvie Ashford	R18-07-005	Heat	Read and analyze IOUs' proposal for extreme heat proposals to outline issues for protest	12/19/25	2.00
Sylvie Ashford	R18-07-005	Heat	Call with UCAN to discuss protest positions and CalHeatScore impacts analysis	1/5/26	0.50
Sylvie Ashford	R18-07-005	Heat	Draft protest to Joint AL 5707E et al, background	1/5/26	2.50
Sylvie Ashford	R18-07-005	Heat	Draft protest to Joint AL 5707E et al, proposed modifications to heat thresholds	1/5/26	2.75
Sylvie Ashford	R18-07-005	Heat	Coordinate protest drafting with team	1/5/26	0.25
Sylvie Ashford	R18-07-005	Heat	Call with NCLC to discuss protest positions	1/6/26	0.10
Sylvie Ashford	R18-07-005	Heat	Review and incorporate HGoodson edits to protest	1/6/26	0.50
Sylvie Ashford	R18-07-005	Heat	Full review and final revisions to protest for service	1/6/26	1.00
Sylvie Ashford	R18-07-005	Heat	Read other party protests to Joint IOU AL	1/6/26	0.25
Sylvie Ashford	R18-07-005	Heat	Read and analyze PG&E response to protests	1/13/26	0.50
Sylvie Ashford	R18-07-005	Heat	Correspond with HGoodson re PG&E response to protests and next analysis steps	1/13/26	0.25
Sylvie Ashford	R18-07-005	Heat	Correspond with CalHeatScore team re heat risk tool data availability	1/13/26	0.25
Sylvie Ashford	R18-07-005	Heat	Review SMJUs extreme heat proposal and UCAN protest	1/26/26	0.25
Sylvie Ashford	R18-07-005	Heat	Review IOUs extension request, coord next steps w HGoodson, request info from IOUs	4/20/26	0.50
Sylvie Ashford	R18-07-005	Heat	Coord next steps on extreme heat protections w CforAT	4/21/26	0.25
Sylvie Ashford	R18-07-005	Heat	Correspond w C4AT, NCLC about energy division guidance on Joint AL, need for ex partes	4/23/26	0.25
Sylvie Ashford	R18-07-005	Heat	Call w CforAT to discuss plan for ex parte	4/28/26	0.50
Sylvie Ashford	R18-07-005	Heat	Draft ex parte meeting request	4/28/26	0.25
Sylvie Ashford	R18-07-005	Heat	Correspond w HGoodson re ex parte meeting	4/28/26	0.10
Sylvie Ashford	R18-07-005	Heat	Review party protests, procedural updates on extreme heat for ex parte	4/29/26	0.50
Sylvie Ashford	R18-07-005	Heat	Correspond w CforAT re plan for ex parte presentation	4/29/26	0.25
Sylvie Ashford	R18-07-005	Heat	Prep for extreme heat ex parte	4/29/26	0.50
Sylvie Ashford	R18-07-005	Heat	Edit and shorten ex parte handout from CforAT	4/30/26	1.25
Sylvie Ashford	R18-07-005	Heat	Ex parte w Cmmr Houck on extreme heat	4/30/26	0.50
Sylvie Ashford	R18-07-005	Heat	Call w CforAT to discuss plan for motion	4/30/26	0.25
Sylvie Ashford	R18-07-005	Heat	Correspond w UCAN to discuss joint action on extreme heat emergency motion	4/30/26	0.25
Sylvie Ashford	R18-07-005	Heat	Correspond w HGoodson re ex parte meeting, next steps	4/30/26	0.25
Sylvie Ashford	R18-07-005	Heat	Draft emergency motion to lower the extreme heat threshold for suspending disconnections	5/18/26	2.25
Sylvie Ashford	R18-07-005	Heat	Continue drafting emergency motion, background and 90 degree proposal	5/20/26	3.50
Sylvie Ashford	R18-07-005	Heat	Draft motion to shorten time to respond to motion	5/20/26	2.00
Sylvie Ashford	R18-07-005	Heat	Expand citations, examples for emergency motion	5/21/26	1.00
Sylvie Ashford	R18-07-005	Heat	Incorporate HGoodson feedback, revise emergency motion	5/21/26	0.50
Sylvie Ashford	R18-07-005	Heat	Share draft emergency heat motion and motion to shorten time w CforAT, NCLC, UCAN	5/21/26	0.10
Sylvie Ashford	R18-07-005	Heat	Correspond w UCAN re modifications to emergency heat motion proposal	5/22/26	0.25
Sylvie Ashford	R18-07-005	Heat	Coord joint motion review and final revisions w CforAT, UCAN, NCLC	5/26/26	0.25
Sylvie Ashford	R18-07-005	Heat	Call w MKasnitz of CforAT to discuss revisions to joint motion	5/26/26	0.25
Sylvie Ashford	R18-07-005	Heat	Correspond w HGoodson on final revisions to emergency heat motion proposals	5/27/26	0.10
Sylvie Ashford	R18-07-005	Heat	Review and integrate CforAT edits on motion to shorten time	5/27/26	0.25
Sylvie Ashford	R18-07-005	Heat	Coord party approval, final changes to updated motions	5/27/26	0.25
Sylvie Ashford	R18-07-005	Heat	Revisions and preparation of attachments to extreme heat motion	5/28/26	0.50
Sylvie Ashford	R18-07-005	Heat	Incorporate final revisions from other signers to extreme heat motion and motion to shorten time	5/28/26	0.25
Sylvie Ashford	R18-07-005	Heat	Review IOU and Cal Advocates responses to emergency motion, discuss strategy w other parties	6/11/26	0.25
Sylvie Ashford	R18-07-005	Heat	Review draft resolution on extreme heat disconnection protections	6/22/26	0.25
Sylvie Ashford	R18-07-005	Heat	Coordinate w CforAT re next steps on draft resolution	6/23/26	0.25
Sylvie Ashford	R18-07-005	Heat	Draft comments proposing modifications to extreme heat draft resolution	6/23/26	2.50
Sylvie Ashford	R18-07-005	Heat	Correspond w CforAT re comments on draft resolution	6/24/26	0.25
Sylvie Ashford	R18-07-005	Heat	Revise draft comments to reflect CforAT feedback	6/24/26	0.25
Sylvie Ashford	R18-07-005	Heat	Coord draft comments w other parties	6/24/26	0.10
Sylvie Ashford	R18-07-005	Heat	Coord draft comments w other parties and HGoodson	6/26/26	0.25
Sylvie Ashford	R18-07-005	Heat	Incorporate party edits and final revisions to comments on draft res	6/26/26	0.50
Substantial Total					58.95
Comp Total					7.00
Grand Total					65.95

ATTACHMENT 3

Joint IOU Tier 3 Advice Letter Proposing Extreme Heat Disconnection Protections, SCE Advice
Letter 5707-E et al., 12/17/25

December 17, 2025

Advice Letter No. 5707-E

(Southern California Edison Company U 338-E)

Advice Letter No. 4770-E

(San Diego Gas & Electric Company U 902-M)

Advice Letter No. 7783-E

(Pacific Gas and Electric Company U 39-E/G/M)

Advice Letter No. 6570-G

(Southern California Gas Company U 904-G)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Joint Investor-Owned Utilities (IOUs) Advice Letter to Propose
Region-Specific Heat Risk Protections

PURPOSE

Pursuant to Ordering Paragraph (OP) 4 of Decision (D.) 25-06-012, Southern California Edison Company (SCE), on behalf of itself, Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), (collectively, the Electric IOUs) and Southern California Gas Company (SoCalGas)¹ submits this Tier 3 Advice Letter (AL), to propose an approach for adjusting the temperature thresholds that require halting disconnections, taking into account relative heat risks.

BACKGROUND

In Phase I of the Disconnections OIR Rulemaking (R.) 18-07-005, the Commission adopted statewide extreme weather disconnection protections. On June 16, 2020, the Commission issued D.20-06-003, which established that residential electric customers may not be disconnected for non-payment when local temperatures above

¹ Although OP 4 of D.25-06-012 also names SoCalGas, as a gas utility SoCalGas is only subject to the current 32°F cold weather protection threshold under CoL 8 of D.20-06-003. For the same reason, the Electric IOUs are limiting this submission to electric Advice Letters only.

100°Fahrenheit (F) or below 32°F are forecast within a 72-hour look-ahead period.² This rule made permanent an interim moratorium on disconnections during extreme hot or cold weather from D.18-12-013, reflecting the Commission's recognition that loss of power during temperature extremes poses serious public health risks. Furthermore, the Commission permitted the IOUs to continue using their own internal weather monitoring systems to meet the requirement.³

On August 14, 2024, in light of increasing heat waves, The Utility Reform Network (TURN) filed an Emergency Motion in R.18-07-005, urging the Commission to strengthen disconnection protections during "extreme heat" events. TURN argued that the existing 100°F statewide threshold was too high and not tailored to local climate norms, leaving many customers unprotected during dangerous heat conditions.⁴ On October 14, 2024, the Commission issued a ruling denying TURN's emergency motion. The ruling acknowledged TURN's concerns but found that no emergency warranting immediate rule changes had been demonstrated.

On October 30, 2024, the Assigned Commissioner issued an Amended Phase 2 Scoping Memo and Ruling in R.18-07-005, expanding the proceeding's scope to include "disconnection protections under extreme weather conditions."⁵ The Amended Scoping Memo formally added TURN's extreme heat issues to Phase 2 and set forth a process to develop the record.

On June 12, 2025, the Commission issued D.25-06-012, addressing, among other topics, the extreme heat protection proposals. In D.25-06-012, rather than immediately adopting specific temperature thresholds or specific heat risk measures, the Commission set in motion a collaborative process to refine the protections. The decision acknowledges that additional disconnection safeguards are needed for extreme heat events and directs utilities to develop those measures in coordination with interested parties. Ordering Paragraph 4 of D.25-06-012 requires the IOUs to jointly submit a Tier 3 Advice Letter within six months of the decision proposing adjusted "heat-triggered" disconnection thresholds.

DISCUSSION

A. Current Extreme Weather Protections

D.20-06-003 prohibits energy utilities from shutting off residential electricity when temperatures are forecasted to exceed 100°F or drop below 32°F within a 72-hour window. Utilities are permitted to rely on their own internal weather prediction systems for this determination. These measures came into effect after the COVID-19 customer

² OP 1(f) of D.20-06-003.

³ *Id.*

⁴ TURN's Emergency Motion To Modify Weather-Related Disconnection Protections to Better Address "Extreme Heat" Health and Safety Risks, filed August 14, 2024.

⁵ Amended Scoping Memo, p. 4.

protections were lifted on July 1, 2021.⁶ Each of the IOUs implemented these weather protections according to their respective operational requirements and based on their own internal weather forecast systems and methodologies.

B. Working Group Process

The IOUs were directed to develop a proposal to lower the temperature or other relevant thresholds that trigger disconnections suspensions, in collaboration with the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), TURN), Center for Accessible Technology (CforAT), and National Consumer Law Center (NCLC), and any other interested parties to the proceeding. Accordingly, three stakeholder working group meetings were held, facilitated by the IOUs. The IOUs shared multiple proposal options for consideration and received feedback from working group participants.

Event	Date
Working Group Meeting #1	8/28/2025
Working Group Meeting #2	10/10/2025
Working Group Meeting #3	11/12/2025

A detailed summary of the working group meetings and party positions can be found in Attachment A. Additionally, informal feedback and meeting materials submitted by the working group members have been included within Attachments B, C and D:

Party Feedback Received Following Working Group Meeting #2		Date Submitted
Attachment B-1	CalAdvocates Feedback on Extreme Heat Protections Proposals from the Second Working Group Meeting, October 10, 2025	10/20/25
Attachment B-2	CforAT & NCLC Feedback on Extreme Heat Proposals from Extreme Weather Protections Working Group Meeting 2 October 20, 2025	10/20/25
Attachment B-3	Informal Feedback of The Utility Reform Network on IOU Proposal for Extreme Heat Disconnections Protections	10/20/25

⁶ Per OP 1 of D.20-06-003, heat protections were required to be in place once the Covid-19 customer protections ended. Subsequently, Resolution M-4849 ordered the end of these protections was ordered as of July 1, 2021.

Attachment B-4	Informal Response of the Utility Consumers' Action Network on Modifying Existing Temperature Thresholds for Disconnections Including the IOUS' and TURN's Proposals	10/20/25
Attachment B-5	UCAN's Extreme Heat Protections Proposal	11/07/25

Party Feedback Received Following Working Group Meeting #3		Date Submitted
Attachment C-1	CforAT & NCLC Feedback on Extreme Heat Proposals from Extreme Weather Protections Working Group Meeting #3 November 17, 2025	11/17/25
Attachment C-2	TURN Informal Feedback on 11/12/25 Working Group Meeting	11/17/25
Attachment C-3	UCAN's Feedback to Working Group 3 Meeting	11/17/25

C. Evaluation of Relative Heat Risk Measures

The proposal must consider the relative heat-risk approach raised by TURN and “shall identify regions in each Large IOU’s territory that should have a lower temperature threshold to suspend disconnections [and] then propose region-specific thresholds.”⁷ Furthermore, the Commission provided guidance on seeking proposals that meet the following criteria: “[P]roposals that have a targeted focus on reducing customers’ relative heat exposure, that rely on data and tools that are proven and consistently available, and minimize cost and burden of implementation.”⁸ Finally, the Commission clarified that the proposal does not have to be a consensus among all parties and that the advice letter should identify areas of agreement and disagreement, and permit stakeholders to lay out their position.⁹

The Electric IOUs evaluated multiple measures of heat risk, including publicly available indices of heat risk and the option of creating an IOU internal measure. As described in Attachment A, the working group process initially focused on a heat protection calculation developed by the Electric IOUs and based on an approach using the 98th percentile of heat values. This approach would require daily calculations of the disconnection protection threshold. The IOUs developed this approach due to concerns regarding the reliability and accessibility of existing measures, specifically, the experimental nature of the National Oceanic and Atmospheric Administration (NOAA) National Weather Service (NWS) HeatScore, which was not guaranteed to be available in the future, and the early development stage for the California-specific CalHeatScore.

⁷ D.25-06-012 at 35.

⁸ *Id.*

⁹ *Id.*

The NWS HeatScore was the tool proposed for use in TURN's original motion,¹⁰ but the IOUs' original concerns about HeatRisk's availability and reliability¹¹ have not been resolved.¹² For the CalHeatScore tool, the Electric IOUs confirmed that the tool will be permanently available with long-term funding provided as per Assembly Bill (AB) 2238. However, the CalHeatScore tool, having launched only in May 2025, does not have historical data available for assessment and has not yet developed a system for automated data exchange, complicating its near-term integration into IOU billing systems.

In addition, the Electric IOUs compared different aggregation levels for the region-specific thresholds. In general, larger geographic areas (e.g., forecast zones or counties) tend to under-protect hotter areas and over-protect more moderate areas due to mean-based bias in the protection threshold. However, at smaller aggregation levels, differences become less apparent. To inform the IOUs assessment of heat protection alternatives, SCE conducted a sample comparison of its current city-level approach with a zip-code level approach and found that the difference in customer-days protected was very close between both methods. Therefore, the Electric IOUs concluded that heat risk measures at smaller geographic areas of aggregation were preferable, but that the specific aggregation may not matter as much as the size of the area covered. The asymmetric protection due to the mean-bias appears to be sufficiently addressed at the zip code level, due to the stronger correlation among temperature points in close geographic proximity.

Finally, the Electric IOUs evaluated measures with regards to the cost and burden of implementation, which depends on the extent of change required for each IOU, compared to current system implementation and processes, as well as the complexity of internal calculations versus externally available 'ready-to-use' measures of heat risk.

D. Overview of the Joint Electric IOUs' proposal

1. The Joint Electric IOUs Propose the CalHeatScore as a Simple, Single-Measure Option for Relative Heat Risk Protection

With input from the Working Group, the Joint Electric IOUs evaluated multiple options for Relative Heat Risk Protections. Despite initial reservations about the newness and lack of a data interchange for CalHeatScore, the Joint Electric IOUs propose the adoption of CalHeatScore as the primary tool for heat protection to address the Commission's requirements for targeted and regionally tailored heat risk protections. The State of California has made a significant investment in the development of the CalHeatScore tool. Building on this foundation will ensure that the CalHeatScore

¹⁰ TURN's Emergency Motion at 10.

¹¹ Joint Response to TURN's Emergency Motion, filed August 29, 2025.

¹² As of December 2025, the NWS HeatRisk webpage continues to display a message describing the HeatRisk information as experimental, noting "This page is experimental to provide a period of time for customers to provide feedback to NWS." See <https://www.wpc.ncep.noaa.gov/heatrisk/>

delivers maximum value. It will enhance statewide resilience efforts, by aligning IOU disconnections protections with other heat protections efforts by local and state government agencies.

The tool is specific to California, using locally relevant data returning heat risk scores at the zip code aggregation level reflecting regional differences in heat risk. In addition, leveraging a third-party tool is cost-effective because it minimizes the need for internal data processing. The CalHeatScore tool therefore meets all technical requirements of D.25-06-012. It poses some challenges for timely implementation by the May 1, 2026 deadline,¹³ as there is not yet a fully deployed data interchange system. However, given the imminent implementation of such a system by summer 2026, the Joint Electric IOUs maintain that the advantages of adopting CalHeatScore outweigh the risk of a potential short delay in deployment.

CalHeatScore was developed pursuant to Assembly Bill (AB) 2238 by the California Office of Environmental Health Hazard Assessment (OEHHA) to provide a heat risk ranking system available to the public by January 1, 2025. The CalHeatScore index ranks heat risk by analyzing historical data that connects climate patterns to impacts on human health throughout California. This approach uses specific climate and health datasets to measure these relationships at the zip code level. Apparent temperature (heat index) ranges identified based on these relationships are then used to assign scores that reflect varying degrees of heat-related health risk.¹⁴

CalHeatScore is a metric that quantifies relative heat exposure across different regions, allowing for the establishment of region-specific thresholds for disconnection suspensions. CalHeatScore offers a simple, easily implementable index that summarizes heat risk for each California zip code into a single measure. CalHeatScore incorporates maximum apparent temperature, commonly known as heat index. This measure “quantifies how current temperature conditions feel to the human body”¹⁵ which are a function of both air temperature and humidity. CalHeatScore uses the NOAA NWS definition of apparent temperature.¹⁶ On the health data side, CalHeatScore employs data on emergency department visits due to heat related illness from the California Department of Health Care Access and Information (HCAI). The heat-health models underlying CalHeatScore link the highest apparent temperature recorded each day to the number of emergency department visits that occur on that day at the zip code level. Based on the model’s results, a Relative Risk value is determined, which indicates how the rate of emergency department visits for a specific day and zip code differs from the typical rate under average weather conditions.

The Electric IOUs propose halting disconnections when the 72h forecast CalHeatScore index reaches level 3 or higher, designating a “high” impact level. By implementing a

¹³ See D.25-06-012 at 35.

¹⁴ See CalHeatScore Methods Documentation, *available at* <https://calheatscore.calepa.ca.gov/sites/default/files/2025-02/methods02032025.pdf>

¹⁵ *Id.*, p. 2

¹⁶ *Id.*, p. 3

policy to protect customers from service disconnection whenever the CalHeatScore reaches a level 3 (“high impact”), the Electric IOUs can ensure that those most at risk from heat are prioritized, while also minimizing the cost and administrative burden associated with more complex or less reliable systems. Level 3 on the CalHeatScore scale is the appropriate trigger for disconnection protections because it reflects conditions that pose a significant health risk. Importantly, the 72-hour look-ahead period ensures that protections extend to adjacent days that likely register at Levels 2 or even 1, thereby providing additional coverage without lowering the threshold. Moving the trigger to Level 2 would result in excessive activations, capturing many “mild impact” days (Level 1) and creating operational and cost burdens as well as further arrears increases without a commensurate increase in public health benefit. Level 3 therefore strikes the right balance between robust customer protection and practical implementation.

Because CalHeatScore itself incorporates not just absolute temperature, but apparent temperature, CalHeatScore can be used as a single-measure index of heat risk. CalHeatScore on its own provides a comprehensive and reliable assessment of relative heat risk, effectively capturing the nuances of local climate and health impacts without the need to supplement it with separate absolute temperature thresholds or additional metrics. By relying exclusively on CalHeatScore, the proposal ensures that protection measures are both targeted and responsive to region-specific conditions, eliminating the complexity that could arise from layering multiple measures.

This approach streamlines implementation and creates differentiated protections for customers, as CalHeatScore is specifically designed to reflect varying degrees of heat-related health risk at the zip code level. Therefore, no further overlays or supplementary criteria are necessary; CalHeatScore alone is sufficient to guide regionally tailored heat risk protections. This approach aligns with the Commission’s guidance by leveraging an effective, data-driven tool that supports equitable and practical implementation across diverse service territories. Using CalHeatScore will generate a custom threshold tied to each zip code’s own climatological normals.

2. CalHeatScore Implementation Timeline and Considerations

While CalHeatScore offers a robust and equitable foundation for regionally tailored heat risk protections, it is important to note that the Application Programming Interface (API) for the tool may not be fully available or operational by the Commission’s required implementation date of May 1, 2026.¹⁷ On October 31, 2025, OEHHA informed SCE via email that it is developing an API and expects to make it available in summer 2026. On November 25, 2025, OEHHA informed SCE that it had published an initial draft, proof-of-concept API on the CA State Geoportal,¹⁸ with an official draft API to be released in early 2026.

¹⁷ See D.25-06-012 at 35.

¹⁸ Available at <https://gis.data.ca.gov/datasets/OEHHA::california-zip-codes-7-day/about>

The Electric IOUs are currently assessing the draft API and plan to continue to collaborate with OEHHA to ensure that the integration process aligns with the technical requirements and timelines for each utility. This partnership aims to facilitate early access to test data, streamline system modifications, and address any operational challenges as they arise. By coordinating closely during the API's development and rollout phases, the Electric IOUs will be better positioned to update billing systems, validate data flows, and train staff for consistent and accurate implementation. Ultimately, this proactive approach supports a timely and effective transition to CalHeatScore-based heat protections, while accommodating the unique system needs of each IOU.

Once the API is fully available and ready for production, the development and integration of CalHeatScore into utility operations necessitates additional time for billing system updates deployment, validation and testing, and staff training to promote accurate and consistent application. Depending on each Electric IOU's system requirements and the specifics of the API, this will take variable amounts of time. More details can be found in the Section F. on Implementation.

If the API is not fully available at the time one or more of the Electric IOUs need it to meet the May 1, 2026 implementation timeline, the Electric IOUs intend to request an adjustment to the implementation schedule, by submitting an extension request to the Executive Director of the CPUC in accordance with General Order 96-B. Any extension would likely be a matter of months, providing sufficient time for CalHeatScore to be fully operational and for the benefits of this data-driven approach to be realized without compromising reliability or effectiveness.

While uncertainty remains regarding the timing of the API's availability, it is important to note that development of an internal Electric IOU methodology could likewise not commence until Advice Letter approval and would require substantially more effort than adopting an existing solution, thereby introducing its own delays. In practice, neither the internally developed 98th percentile approach nor the CalHeatScore solution is likely to meet the Commission's May 1 deadline, given that the start of development work is tied to the approval date of this Advice Letter.

Given the similar timelines, CalHeatScore is the better solution, as it is a simple, single measure index, ties in with other statewide heat protection measures, and avoids costly ongoing manual maintenance and control work for the Electric IOUs. Accordingly, the Commission could, through its Resolution, elect to modify the schedule so that implementation begins upon the latter of the CalHeatScore API becoming available or the approval of the Tier 3 Advice Letter, followed by the projected implementation period for each Electric IOU.

In a best case scenario, the Electric IOUs project the following feasible timeline:

February 2026	Commission issues proposed resolution
March 2026	Approval of Tier 3 Advice Letter
April 2026	IOUs begin shift to zip code approach and test the draft API, if available
May 2026	CalHeatScore API fully available
August 2026	Earliest date one or more IOUs could implement
November 2026	Latest date all IOUs implement (would shift if API and/or Commission decision on Tier 3 AL are delayed)

3. Additional features

As described above, CalHeatScore provides a single score with the forecasted extreme heat risk conditions between 0 (low) and 4 (severe) and given the incorporated weather and health data, can be used as a stand-alone method for implementing regionalized heat protections. However, there are a few additional features of the proposed heat protection method that are worth highlighting.

CalHeatScore provides look-ahead estimates of the score in upcoming days. As such, it enables the Electric IOUs to maintain the established 72-hour lookahead period currently in effect pursuant to D.20-06-03. The lookahead period stops residential disconnections before a heat wave to ensure customers have power during extreme heat. The Electric IOUs propose to maintain the 72-hour lookahead period, in compliance with OP 1(f) of D.20-06-003. In practice, this will mean that on a given day, disconnection protections will be in place in a zip code, if the CalHeatScore value for either the current day, or any of the next three days is at level 3 or above.

The Electric IOUs also considered the possibility that the CalHeatScore index may be temporarily unavailable due to unexpected circumstances. In that circumstance, the IOUs propose to keep the current maximum temperature threshold of 100° F in place as a fallback. In such circumstances, the Joint Electric IOUs should be considered to be compliant with heat protection rules.

E. Implementation

1. SCE

SCE's extreme weather protection process is currently not integrated into the automated billing system. Instead, it relies on executing daily scripts that identify eligible accounts based on protection criteria. These outputs are then fed into a semi-manual

workflow, where additional validation and processing steps are performed before removing the customers in protected areas from the population eligible for disconnection for that day. This approach ensures compliance but requires ongoing coordination between system operations and manual review teams.

Under SCE's current implementation of the heat protections, maximum heat and cold temperature limits are at the city level. Each morning, an automated process retrieves two NOAA forecast files that provide a seven-day weather outlook. Using a city's latitude and longitude, NOAA supplies the forecasted daily high and low temperatures. The data is then processed to extract these values by both city and day, and additional steps update the customer records with "no cut" dates.

The proposed modifications involve transitioning to CalHeatScore Level 3, setting a maximum temperature threshold of 100°F as a backstop, and maintaining cold-weather protection at 32°F. Since CalHeatScore functions at the ZIP code level, it is necessary to adjust the current cold-weather protocol to operate based on ZIP codes rather than cities. This change will unify heat and cold protections under a single aggregation level, thereby reducing complexity and minimizing risk by eliminating the need for separate processes.

To expedite the deployment of CalHeatScore, SCE plans to switch to a zip-code based approach for both extreme heat and cold protections once the Advice Letter is approved, in order to prepare for expedient implementation of the new heat protection method once the CalHeatScore API becomes available. The API is expected to streamline data ingestion compared to a percentile-based method and enable more accurate targeting of protective measures. Furthermore, temperature data falling below 32°F or exceeding 100°F will be consolidated into a single composite score to reduce product duplication and simplify reporting. During the initial phase, existing logic for the 100°F maximum temperature will remain in place as preparations are made for API-driven automation, with full automation to be implemented following finalization of the API specifications.

Special considerations for this initiative include an initial increase in manual work during the transition to ZIP code-level exclusions, as well as technological dependencies—with API readiness being critical and the project timeline reliant on CalHeatScore API availability. Integration with existing processes will necessitate re-engineering efforts.

The implementation timeline begins upon approval of the advice letter. Leveraging current NOAA data, development of the ZIP code-based process will commence upon approval of the AL, even if the API is not immediately available. This phase is expected to take about one to two months. Once the API is fully available, efforts will focus on the integration of CalHeatScore API, the finalization of the automation logic, system testing, and preparation for stakeholder training. Unless there are unexpected issues with API integration, SCE expects to be able to fully deploy the API-driven solution within 3 to 4 months of API availability, provided the advice letter is approved by the Commission by the time the API becomes available.

While it is challenging to provide a precise timeframe for full deployment prior to fully reviewing the APIs, implementing the CHS APIs is anticipated to be more straightforward than adopting a percentile-based approach, due to avoiding set-up, testing, and quality control of internal calculations. Budget projections show minimal incremental costs, as internal teams will manage process updates, and no significant IT expenditures are expected for SCE, due to the extreme weather protection process not being directly integrated into the automated billing system.

2. SDG&E

SDG&E's system currently sets maximum and minimum temperature thresholds for the 8 Area and 241 Sub-area regions. Each Sub-area is linked to the ZIP code GIS coordinates. The 241 sub areas in our territory covers a more granular area compared to the approximate 111 zip codes. Using a 72-hour forecast, SDG&E identifies potential disconnection moratoriums during extreme weather conditions (temperatures above 100°F or below 32°F). An internal weather report is reviewed daily to determine whether a moratorium should be applied for the relevant dates.

The proposed update would incorporate new data from CalHeatScore Level 3 and require enhancements to the back-end layout and format to support and validate the new dataset. Additional time will be needed to test the data to ensure input values produce the expected output. From an implementation standpoint, SDG&E estimates approximately six months from the time the CalHeatScore Level 3 data is production ready (i.e. the CalHeatScore API becomes available), to complete evaluation, testing and deployment. Budget projections reflect minimal incremental costs as SDG&E can utilize the existing sub-area and ZIP code GIS coordinates structure to code into the system.

Overall, one solution to lower temperature thresholds is recommended over multiple solutions as doing so minimizes duplicative costs and implementation.

3. PG&E

PG&E's current system sets maximum heat and cold temperature limits at the city level. Each morning, an automated process retrieves weather model forecast files that provide a seven-day temperature forecast. These forecast points are then translated to cities and populated into a Structured Query Language (SQL) table. This table feeds an internal web page that lists all of the cities forecasted to meet either a high equal to or greater than 100°F or a low equal to or less than 32°F. The operations teams then reference this webpage to understand where restrictions are in place, suspending disconnections accordingly.

The proposed modifications will require transitioning to CalHeatScore Level 3 as a new threshold, setting a maximum temperature threshold of 100°F as a backstop, and maintaining cold-weather protection at 32°F. Since CalHeatScore functions at the ZIP

code level, the zip codes for each city within PG&E territory will need to be identified. PG&E's system will then need to import zip code data (based on CalHeatScore forecasts through the CalHeatScore API when available), reference the CalHeatScore value within the SQL and web page, and identify locations where the forecasted CalHeatScore is 3 or greater to ensure appropriate protections are applied.

PG&E anticipates that there will be an increase in manual work for the development of connection and automation with the new CHS API, translating the cities to zip codes for the purpose of pulling CalHeatScore values, and work to rescheme SQL tables and the web site final product. All changes will need to be quality controlled and tested before being moved to production.

PG&E estimates that it will take up to 6 months after the CalHeatScore becomes available to implement the new heat protections.

COST RECOVERY

Pursuant to D.25-06-012, Conclusion of Law (COL) 9, the IOUs may record the incremental costs incurred to implement this decision to their disconnection memorandum accounts.

TIER DESIGNATION

Pursuant to GO 96-B, and OP 4 of D.25-06-012, SCE submits this advice letter with a Tier 3 designation.

EFFECTIVE DATE

Pursuant to General Order (GO) 96-B, this Tier 3 advice letter will become effective upon Commission Resolution.

NOTICE

Anyone wishing to protest this advice letter may do so only electronically. Protests must be received no later than 20 days after the date of this advice letter. Protests should be submitted to the CPUC Energy Division at:

E-mail: EDTariffUnit@cpuc.ca.gov

In addition, protests and all other correspondence regarding this advice letter should also be sent electronically to SCE, PG&E, SoCalGas and SDG&E on the same date it is emailed to the Commission to the attention of:

For SCE:

Connor Flanigan
Vice President, State Regulatory Operations
Southern California Edison Company
E-mail: AdviceTariffManager@sce.com

Adam Smith
Director, Regulatory Relations
Southern California Edison Company
c/o Karyn Gansecki
E-mail: Karyn.Gansecki@sce.com

For PG&E:

Attn: Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
E-mail: PGETariffs@pge.com

For SDG&E:

Attn: Greg Anderson
Regulatory Tariff Manager
E-mail: GAnderson@sdge.com

For SoCalGas:

Attn: Veronica Arroyo
Regulatory Tariff Manager
E-mail: VGarcia2@socalgas.com

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this advice letter to SCE's GO 96-B and R.18-07-005 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or (626) 302-6838. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

To view other SCE advice letters submitted with the Commission, log on to SCE's web site at <https://www.sce.com/regulatory/regulatory-information/advice-letters>.

For questions, please contact Miriam Fischlein at (626) 302-0233 or by electronic mail at Miriam.Fischlein@sce.com.

Southern California Edison Company

/s/ Connor Flanigan
Connor Flanigan

CF:mf:lp



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

☒ ELC ☒ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Darrah Morgan

Phone #: (626) 302-2086

E-mail: AdviceTariffManager@sce.com

E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5707-E, 4770-E, 7783-E, 6570-G

Tier Designation: 3

Subject of AL: Joint Investor- Owned Utilities (IOUs) Advice Letter to Propose Region-Specific Heat Risk Protections

Keywords (choose from CPUC listing): Compliance

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:
Decision 25-06-012

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? ☐ Yes ☒ No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? ☒ Yes ☐ No

Requested effective date:

No. of tariff sheets: -0-

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: None

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets: None

¹Discuss in AL if more space is needed.

Protests and correspondence regarding this AL are to be sent via email and are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Connor Flanigan
Title: Vice President, State Regulatory Operations
Utility/Entity Name: Southern California Edison Company

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: AdviceTariffManager@sce.com

Contact Name: Adam Smith c/o Karyn Gansecki
Title: Director, Regulatory Relations
Utility/Entity Name: Southern California Edison Company

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: karyn.gansecki@sce.com

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Clear Form

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtailable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

Attachment A

Summary of Party Positions

Summary of Party Positions

Pursuant to D.25-06-012, the Joint Electric IOUs were directed to develop a proposal to lower the temperature or other relevant thresholds that trigger disconnections suspensions, in collaboration with CalAdvocates, TURN, CforAT, and NCLC, and any other interested parties to the proceeding. Accordingly, three stakeholder working group meetings were held, facilitated by PG&E and the IOUs. These meetings provided a forum through which IOUs shared multiple proposal options for consideration and received feedback from working group participants. Proposals submitted by TURN and UCAN were reviewed in addition to the Large IOUs’ proposals.

Event	Date
Working Group Meeting #1	8/28/2025
Working Group Meeting #2	10/10/2025
Working Group Meeting #3	11/12/2025

The decision notes that consensus among all stakeholders is not necessary, however issues on which parties disagree are to be captured within the Advice Letter along with explanations to support differing opinions.¹ The Joint IOUs summarize the working group discussions and party positions below.

Working Group 1

On August 28, 2025, a working group comprised of Joint Utilities and interested parties to the proceeding met to discuss potential proposals that would address the relative heat risks as identified in TURN’s motion filed August 14, 2024. The IOUs reviewed the proposal guidelines from D.25-06-012 and provided an overview of 4 potential options for consideration, sharing the pros and cons of each.

Proposal	Pros	Cons
Lowering the heat threshold to <100 degrees	Leverages existing IOU processes, quicker to implement, can be easily modified should future changes be adopted	Not region specific; Does not incorporate non-temperature related impacts
Lowering the heat threshold to <100 degrees, with regional differences	Leverages some existing IOU processes, quicker to implement, can be easily modified should future changes be adopted	Does not incorporate non-temperature related impacts

¹ D.25-06-012, p.35

Utilizing HeatRisk Tool	Would not require IOUs to conduct additional calculations	Still experimental, unclear whether tool will be available long term as funding is uncertain
Utilizing CalHeatScore Tool	Local to California, would not require IOUs to conduct additional calculations, likely to be more reliable due to long term funding	Still in development, website does not have a data feed yet, which would make for difficult implementation

Option 1 proposed lowering the existing temperature threshold to a value less than 100°, an approach that could be easily implemented by leveraging processes already in place. While the least costly and quickest to implement, the IOUs acknowledged that this approach fails to meet the regionalization requirement.

Option 2 proposed lowering the existing temperature thresholds by calculating 98th percentile temperatures by region, an approach that would not require extensive data, while still meeting the proposal guidelines. The IOUs identified however, multiple gaps including the need to define the appropriate areal basis as well as the need for more recent climatology.²

Option 3 proposed utilization of the National Weather Service HeatRisk product, which identifies periods of unusual heat for a particular location. While IOUs felt the tool was easy to use and accessible, met the regionalization requirements, and was scientifically sound, there was concern that the tool is still experimental and not guaranteed to remain operational long term.

Option 4 proposed utilization of CalHeatScore, which identifies periods of unusual heat for a particular zip code that may lead to elevated visits to emergency departments. While the IOUs felt the tool was scientifically sound and met the regionalization requirements, the IOUs expressed concern with poor accessibility for use in automation as no API exists for this product (OEHHA informed the IOUs later that the development of a data warehouse, as well as an API, is underway and is anticipated to be available in the summer of 2026).

Stakeholders such as TURN commented that it would be helpful if the IOUs performed analysis comparing the different tools. UCAN asked the IOUs to lower the temperature threshold from the IOUs' current 100°, stating a threshold of 100° will not provide adequate extreme-heat protections. Additionally, parties requested consideration of other factors beyond temperature, such as humidity, and asked IOUs to consider combining multiple measures to best protect customers from heat impacts. Lastly, parties expressed interest in learning the cost of each option, asking the IOUs to provide cost

² Cal Adapt uses observations from 1961-1990 to define the 98th percentile temperatures that were provided in TURN's motion

information in future meetings. They noted that without knowing the cost difference between options, it is impossible to consider implementation costs during decision making.

Working Group 2

On October 10, 2025 the extreme weather protections working group reconvened for a second meeting, with the IOUs focusing more closely on the 98th percentile approach previously discussed. The IOUs determined after additional analysis that this approach was the best permanent option to meet the regional variation and low cost objectives, in the absence of readily available, fully reliable heat impact metrics. Additionally, based on preliminary analysis performed, utilization of 98th percentile temperature thresholds would expand protections in more moderate climate zones. Background information and methodology for the 98th percentile proposed approach was shared, followed by SCE region specific illustrative examples of what the thresholds would look like at a city level. Based on the preliminary findings, the IOUs noted that geographical differences across the state could result in the 98th percentile temperature exceeding the existing 100° threshold. Moreover, in areas with colder climates, the 98th percentile temperatures calculated fell well below temperatures that would pose heat related risks. For this reason, IOUs proposed maintaining a ceiling and a floor. Should the 98th percentile temperature fall above 100°, the ceiling would remain at the current threshold of 100°. Should the 98th percentile calculation result in moderate temperatures, these areas would adopt a floor threshold of 85°.

UCAN stated that the IOUs' 100° F ceiling temperature is too high, noting that other states that limit disconnections due to high temperature considerations use lower temperature thresholds. UCAN noted that Illinois uses a 90° F threshold. UCAN also stated that California daycare facilities are limited to a maximum indoor temperature of 85° F.

Prior to the second meeting, parties were encouraged to prepare proposals for joint discussion. TURN presented an alternative proposal with added criteria for consideration to expand protections. Firstly, they recommended a maximum threshold of 95° instead of the IOUs' proposed 100°. They also recommended establishing additional criteria to trigger suspensions, such as humidity and nighttime cooling. TURN also proposed suspending disconnections on any day when the NWS issues a heat advisory, extreme heat watch, or extreme heat warning for a given area. Lastly, TURN recommended suspension of disconnections on any day when the CalHeatScore reaches level 3 or greater, once the data is available for integration.

In response to the proposals presented, other working group members such as UCAN expressed support for integration of other criteria other than temperatures, such as humidity, encouraging IOUs to benchmark against other states' policies. Parties also shared concerns around geographic granularity, stating that county level analysis may be too broad given the variation within counties. Parties were supportive of a zip code based approach as it would acknowledge the geographic scope of some of California's larger cities.

Summary of Written Stakeholder Feedback Following the Second Working Group Meeting

CforAT & NCLC, UCAN, TURN, and CalAdvocates submitted written feedback following the second working group meeting. All parties supported the incorporation of other factors such as humidity and overnight cooling into the proposal, as well as having a 95° ceiling, or lower, as part of the 98th percentile approach. Most parties were supportive of having an interim solution until a long term solution becomes available, with some parties recommending alternative tools such as NWS alerts and HeatRisk. Parties also aligned on incorporating indoor temperature considerations and requests for IOUs to provide additional data. CforAT and NCLC recommended that discussions among the IOUs and parties continue to improve the proposal, including ongoing consideration of the best data sources to use to support a secondary standard (other than simple temperature) as well as the best level of granularity for temperature-based restrictions.

Informal feedback submitted by the working group members has been included as attachments:

Party Feedback Received Following Working Group Meeting #2	
Attachment B-1	CalAdvocates Feedback on Extreme Heat Protections Proposals from the Second Working Group Meeting, October 10, 2025
Attachment B-2	CforAT & NCLC Feedback on Extreme Heat Proposals from Extreme Weather Protections Working Group Meeting 2 October 20, 2025
Attachment B-3	Informal Feedback of The Utility Reform Network on IOU Proposal for Extreme Heat Disconnections Protections
Attachment B-4	Informal Response of the Utility Consumers' Action Network on Modifying Existing Temperature Thresholds for Disconnections Including the IOUS' and TURN's Proposals
Attachment B-5	UCAN's Extreme Heat Protections Proposal

Working Group 3

On November 12, 2025 the extreme weather protections working group met for a third and final meeting. The working group discussed feedback received by parties, summarized below:

WORKING GROUP FEEDBACK 10/20												
	95 ° Ceiling	85 ° Floor	Incorporate Other Factors (Humidity & Overnight Cooling)	Supportive of an interim solution until long term solution is available	Zip Codes or NWS forecast zones	96th Percentile	Moratorium June 1 - October 15	NWS Alerts	CalHeatSc ore	HeatRisk	Indoor Temperature Considerations	Requested Data
CforAT & NCLC	X	X	X	X					X			
UCAN	X*		X		X	X	X				X	
TURN	X	X	X	X	X			X	X**	X	X	X
Cal Advocates	X		X	X						X	X (82 °)	X
*90 ° is preferred ** CHS value of three or higher												

Following the summary of feedback received, UCAN’s proposal recommending lowering the existing temperature threshold to 90° (submitted on 11/7/25) was presented to the working group for consideration. UCAN noted that their proposal would be easy to implement and enables year round disconnections, helping to minimize ratepayer costs. UCAN’s proposal provides citations for lower-temperature California thresholds including CalOSHA’s 82° threshold and California daycare facilities’ maximum indoor temperature requirements of 85°. UCAN also noted that its proposed threshold temperature is higher than the “85-degree floor temperature proposed by the Joint IOUs, which appears to be the Joint IOUs’ proposed safe temperature at any humidity (see Joint IOUs’ October 10, 2025 proposal, p. 9).” UCAN’s proposal is included below as Attachment C-5 and provides citations for the various temperature thresholds.

To account for humidity and overnight cooling concerns raised by stakeholders, the IOUs shared a modified 98th percentile approach with the working group. The updated methodology, which uses daily average temperature percentiles captures an understanding of the temperature over the entirety of the day, and would indirectly account for humidity by accounting for overnight lows, which are typically elevated during more humid summer days.

Cal Advocates asked how the 98th percentile reflects risk in 2025 and if the IOUs had done any analysis on the 96th percentile that was brought up in the second working group meeting. The IOUs could not provide reasoning to support the continued use of the 98th percentile or any additional analysis on the 96th percentile. Cal Advocates asked what the justification was for using a 100-degree ceiling under the 98th percentile approach when that is the current threshold and customers will face risk at well below 100 degrees. The IOUs did not provide any additional evidence of how a 100-degree ceiling mitigates risk under the 98th percentile approach. However, the IOUs had provided background and references

supporting the 98th percentile approach as the appropriate cut-off for when heat becomes dangerous as compared to local climate normals (see slide 8 of the WG 2 deck). In particular, it is important to understand that the CalAdapt 98th percentile approach is based on historical climate normals, so as temperatures continue to rise, the number of 98th percentile days compared to historical norms would also increase. Therefore, the approach is adaptive to future changes in climate conditions. The IOUs therefore disagree with the characterization that the 98th percentile approach requires an additional lowering of the ceiling. The regionalization approach ensures that each community is protected when its local conditions become truly extreme relative to its historically normal climate. This approach inherently accounts for acclimatization and baseline differences.

The meeting agenda also included an IOU update regarding the availability of CalHeatScore as a newly viable option beginning in the summer of 2026. Utilization of CalHeatScore as a tool used to trigger disconnections suspensions was previously ruled out due to the inability to access data for streamlined operationalization. OEHHA informed the IOUs that the development of a data warehouse, as well as an API was underway and anticipated to be available sometime in the summer of 2026. CforAT asked if the utilities can expedite their rollout of implementation of CalHeatScore by coordinating with the CalHeatScore team in advance, and a utility representative confirmed that coordination efforts would help to speed the process.

Because the desired outcomes of the proposal include expansion of heat protections to reduce heat risk, keeping implementation costs low, and minimizing ratepayer impacts, the discussion was centered around determining which option(s) best struck this balance. IOUs expressed a preference for a single-phase implementation, as a multi-phased approach such as adoption of a 98th percentile approach during the interim, followed by full integration of CalHeatScore once available, would be the most costly. UCAN noted on multiple occasions that just changing the temperature threshold would enable a near-zero implementation cost. Cal Advocates asked the IOUs what the basis was for the choice of 98 degrees as the new statewide temperature threshold, pending the utilization of CalHeatScore. The IOUs could not provide an explanation of how the 98° proposal was reached or how it empirically reflects risk. Cal Advocates and other parties previously provided citations for lower temperature thresholds that reflect risk and are more current than the studies or data presented in the working group meetings. In turn, the IOUs had provided background and references supporting the 98th percentile approach by itself as the appropriate cut-off for when heat becomes dangerous as compared to local climate normal (see slide 8 of the WG 2 deck), but indicated a willingness to slightly lower the ceiling to 98°.

Summary of Written Stakeholder Feedback Following the Third Working Group Meeting

CforAT & NCLC, TURN and UCAN submitted written feedback following the third and final working group meeting. All parties were supportive of a multi-phased approach in order to meet the May 2026 implementation timeline as outlined in the decision. CforAT and NCLC support lowering existing temperature thresholds as an interim solution, advocating for 95° or lower as they noted that even 95° may pose heat risk for some individuals. CforAT and NCLC recommended that utilities coordinate with CalHeatScore and specify a “drop dead” date, representing the latest time at which they could receive the necessary CalHeatScore data in order to implement this approach for summer 2026. If this date passes and CalHeatScore is not available, the utilities should move beyond the interim solution and implement the 98 percentile approach. TURN and UCAN both support 90° as an interim threshold until CalHeatScore becomes available. All parties indicated the need for more information and analysis from the utilities in conjunction with their ongoing work and proposals.

UCAN noted that if CalHeatScore (“CHS”) is implemented, the disconnection protections should be triggered at a CHS value of 2 instead of the IOUs’ proposed value of 3 because even a CHS value of 2 results in a significant increase in emergency department visits of up to 66%, demonstrating high heat-induced health risks. UCAN also requested that the IOUs’ advice letter include for the Commission an analysis of the percentage of customers protected during each day of summer for each proposal (Joint IOUs, TURN, and UCAN) and for each large-IOU service territory.

Informal feedback submitted by the working group members has been included as attachments:

Party Feedback Received Following Working Group Meeting #3	
Attachment C-1	CforAT & NCLC Feedback on Extreme Heat Proposals from Extreme Weather Protections Working Group Meeting #3 November 17, 2025
Attachment C-2	TURN Informal Feedback on 11/12/25 Working Group Meeting
Attachment C-3	UCAN's Feedback to Working Group 3 Meeting

Attachment B-1

**CalAdvocates Feedback on Extreme Heat Protections Proposals from the Second
Working Group Meeting**

October 10, 2025

Comments on IOU Proposals to Change Thresholds for Disconnections Moratoriums

Overview of Cal Advocates Feedback

Cal Advocates supports lowering the temperature thresholds that are used to trigger disconnections moratoriums to protect consumers from disconnections during extreme heat. The most comprehensive measure of risk, and the simplest to implement, comes from the NWS Heat Risk Tool, as proposed by TURN. Alternatively, the modified Cal Adapt framework proposed by the IOUS generates regionally specific temperature thresholds that may be safer than the current 100-degree outdoor temperature benchmark. However, Cal Advocates has concerns with the basis for the thresholds proposed. In particular, the current proposals do not rely on recent research, are not substantiated with relevant data, and are not linked to any appropriate measures of safety. Moreover, the recommended solution should avoid elaborate, and likely expensive, procedural changes to implement the new thresholds or criteria. Finally, the IOUs should also provide additional information to stakeholders to better justify their proposals.

Recommendation 1: Any new temperature threshold should be justified by empirical evidence of heat risk.

Any temperature threshold, or other criteria for assessing extreme heat risk, adopted by the Commission should be supported by evidence of what is safe for people. By contrast, the elements of the Cal Adapt framework are not empirically connected to heat risk or supported by current research. If a threshold is not based on scientific facts, then it does not account for real risk to customers.

For many years the maximum tolerable external wet bulb temperature, which reflects the heat and humidity at which bodies evaporative cooling (sweating) stops working, for the human body was considered 95 degrees. More recently, a 2022 study in the Journal of Applied Physiology found that the critical wet bulb temperature for young healthy adults was 77-82.4 degrees in hot and dry environments and 86-87.8 degrees in warm and humid environments (<https://pubmed.ncbi.nlm.nih.gov/34913738/>). Temperature thresholds can also be linked to mortality and morbidity. A 2025 study in the journal Science Advances used data on all cause emergency department visits, hospitalizations, and mortality from all non-federal hospitals in California from 2006-2017 (<https://www.science.org/doi/10.1126/sciadv.adr3070>). The research showed that mortality and hospitalizations increase on anomalously hot and cold days, and a linear relationship between emergency department visits and daily temperatures, which reflects illness and mortality both caused by heat and exacerbated by heat. The study also found that

between certain thresholds, emergency department visits increase specifically on warm days, 71.6-86 degrees, and hot days, 86-93.2+ degrees, and mortality increases at temperatures above 93.2 degrees. As pointed out by TURN's extreme heat motion, there are other populations that are even more sensitive to heat exposure, such as older adults, infants and children, pregnant people, and people with chronic health conditions

(<https://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=537783590>). Another 2024 study established that critical environmental core temperature thresholds decline with age in both dry hot and wet humid environments (<https://pubmed.ncbi.nlm.nih.gov/38813613/>). A 2023 study in the journal Communications Earth and Environment found that older adults reach their critical environmental limits at lower combinations of dry bulb temperature and humidity than younger adults during minimal activity (<https://www.nature.com/articles/s43247-023-01159-9>). This would suggest that for middle aged adults, older adults, and people with chronic health conditions, the threshold is even lower than that for healthy adults.

Recommendation 2: Temperature thresholds should be based on what is safe for people indoors, not only outdoor temperatures.

The IOUs and TURN both cited CalOSHA's Heat Illness Prevention Standards in their presentations at the second working group meeting to support their recommended temperature ceiling and floor values. However, the 85-degree floor for disconnections is not found in the indoor or outdoor CalOSHA standards cited. And the 95-degree threshold to trigger high heat protections referenced, California Code of Regulations, Title 8 section 3395e, is for outdoor workplaces (<https://www.dir.ca.gov/title8/3395.html>). CalOSHA actually requires outdoor cool down procedures to come into effect when the temperature exceeds 80 degrees. Moreover, indoor temperatures can be higher than outdoor temperatures; this study of housing with mixed characteristics in Detroit found that the average maximum indoor temperature was substantially higher than the maximum average outdoor temperature in the homes studied (<https://pmc.ncbi.nlm.nih.gov/articles/PMC4352572/>). A 2023 study in the journal Environment International found that there is a positive relationship between outdoor and indoor temperature and a high level of interpretability of outdoor to indoor temperature in residential buildings in which the range of latitudes that California fall (<https://www.sciencedirect.com/science/article/pii/S0160412023004476>). According to the California Code of Regulations, Title 8 section 3396a, temperature control measures for indoor workplaces are triggered by whenever the temperature, or heat index, reaches 87 degrees and 3396d requires indoor cool down spaces to be maintained at less than 82 degrees (<https://www.dir.ca.gov/title8/3396.html>). In, 2025 the California Department of Housing and Urban Development recommended a maximum safe indoor temperature of 82 degrees (<https://www.hcd.ca.gov/plans-and-reports/ab-209-2022>). Therefore, temperature thresholds

chosen by the IOUs should reflect what indoor temperatures are safe, since people generally spend the majority of their time indoors.

Recommendation 3: The proposal should be low cost to implement and avoid unnecessary complexity.

Cal Advocates is not opposed to options for adjusting the threshold for disconnections moratoriums that utilize the NWS Heat Risk Tool or Cal Adapt framework, but a chief concern is implementation costs and complexity. (Cal Advocates is also not opposed to utilizing CalHeatScore, as proposed by the IOUs, when it becomes available.) It is important to have implementation that is effective and low cost because disconnections are routine and should be designed in a way that is easy to manage. Disconnections are frequently triggered during extreme heat seasons, so implementation must avoid operational complexity that increases risk of customers not receiving timely disconnection protections during dangerous heat events. Implementation that is effective and low-cost aligns with the Commission's mandate to protect consumers while maintaining just and reasonable rates. Overly complex systems that require continuous data modeling or expensive proprietary software can lead to unnecessary spending without a reasonable increase in data accuracy or consumer protections. An effective implementation design for this working group should be something that is flexible to evolving data sources without requiring major procedural overhauls. The most administratively simple solution would be to lower the heat threshold to below 100 degrees with regional variations based on considerations of heat risk supported by recent studies.

Cal Advocates is in support of lowering the threshold for disconnections moratoriums to a safer temperature, but this must be balanced with the cost impacts to ratepayers. The impact on customer arrearages should be considered as part of any decision on what changes to make to the disconnections moratorium. Based on preliminary research by Cal Advocates evaluating past temperatures across a subset of climate zones, changing the temperature threshold from 100 degrees to 95 degrees may result in 15 more days on average falling above the threshold. This increase could exacerbate arrearages for the impacted customers and increase the costs borne by all ratepayers.

Recommendation 4: The IOUs should provide further information to stakeholders.

Cal Advocates provides some follow-up guidance below on how to better inform stakeholders on the proposals:

1. The IOUs should clearly identify the data sources they will use to construct the 1991-2020 data for the CalAdapt tool.
2. The IOUs should make updates to CalAdapt data and analysis and provide them to the working group before submitting the Tier 3 Advice Letter.

3. To ensure methodological transparency, the IOUs should specify what data will be used to support the different aggregation levels, such as County, CEC Climate Zone, NWS Forecast Zone, or City.
4. Given the trend of rising global temperatures, continued reliance on the 98th percentile in the CalAdapt framework requires justification and may not reflect current climate realities.
 - The IOUs should explain why the decade-old study supporting the 98th percentile remains more appropriate than newer research cited in recent peer-reviewed studies, if that is their position.
5. Disconnection protections should be clearly defined, specifying whether they will be triggered based on a 72-hour look-ahead period (as under current rules) or on a daily temperature measurement.
 - The basis for triggering disconnection protections should be explicitly stated to ensure consistent and enforceable application across service territories.
6. The IOUs should quantify how their proposal changes the number of days in which disconnections are prohibited when compared to the current threshold.
7. Similarly, the IOUs should quantify how TURN's proposal would change the number of days in which disconnections are prohibited compared to the current threshold.
8. Because other states have successfully implemented a lower ceiling, the IOUs should identify any specific barriers or challenges to implementing a similar standard in California.
9. The IOUs had a slide for Working Group 1 noting that lowering the heat threshold to below 100 degrees, with regional differences, would be low-cost to implement. Please describe the additional costs of implementing multiple criteria, such as:
 - Humidity thresholds
 - Overnight minimum temperature thresholds
 - Real-time temperature forecast revisions
 - Accounting for regional microclimates
 - Incorporating indoor temperature thresholds

Thank you

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Attachment B-2

**CforAT & NCLC Feedback on Extreme Heat Proposals from Extreme Weather
Protections Working Group Meeting 2**

October 20, 2025

CforAT & NCLC Feedback on Extreme Heat Proposals from Extreme Weather Protections Working Group Meeting 2 October 20, 2025

CforAT and NCLC both attended the Working Group Meeting held on October 10, 2025 to discuss proposals to lower thresholds that trigger extreme heat disconnections. We appreciate the work that went into the IOU proposal as well as the work that went into the alternative proposal from TURN and the input of other parties.

The IOUs have proposed to reduce the temperature threshold to be used with a 3-day look ahead period based on a 98th percentile temperature history, with a ceiling of 100°F and a floor of 85°F. While the presentation by the IOUs looked at temperature histories based on counties, looking at data from 1961-1990, the IOUs expressed an intent to recalculate thresholds using more recent data and expressed willingness to consider alternatives to the use of counties as the appropriate level of granularity. Options discussed at the workshop include city-level temperatures and zip code-level temperatures.

TURN proposed lowering the threshold “ceiling” to 95°F and adding additional criteria to trigger disconnection suspension based on factors other than simple temperature, including humidity and nighttime cooling. TURN noted several potential options for use as the secondary criteria, including an option that relies on alerts distributed by the National Weather Service (heat advisories, extreme heat watches or extreme heat warnings), or the more local CalHeatScore tool. The CalHeatScore option may best be considered as a longer-term proposal, as it does not yet provide data in a format that can be integrated with IOU systems.

Additional concepts suggested at the workshop included direct use of the National Weather Service heat index to trigger disconnection suspensions based on a threshold “felt temperature,” (proffered by NCLC) and use of the 96th percentile temperature rather than a 98th percentile for establishing a ceiling (proffered by UCAN).

At this time, CforAT and NCLC support changes in the existing extreme heat protections that incorporate the following:

- Set a maximum high temperature cutoff of 95°F. This is consistent with the existing ceiling in Arizona, a location where the vast majority of residents can be expected to be acclimated to high temperatures. It is also consistent with CalOSHA guidelines that trigger high heat protections for outdoor workers. The IOUs cite these guidelines in support of their proposed 85°F floor; they should also be considered in setting a ceiling.
- Adopt the IOUs’ proposed floor for restrictions at 85°F.
- Include an additional standard that accounts for factors other than temperature alone.

The IOUs are required to file a joint Tier 3 Advice Letter on or before December 17, 2025. CforAT and NCLC recommend that discussions continue to allow ongoing consideration of the best data sources to use to support a secondary standard (other than simple temperature) as well as the best level of granularity for temperature-based restrictions. We understand that consideration of alternatives will need to consider availability and ease of adoption, as well as cost. It is possible that the parties may jointly determine that the best short-term option should be reconsidered in the future and suggest a timeline or trigger for such reconsideration (e.g. the availability of the CalHeatScore data with a usable tool for integration with the IOU systems).

Ideally, the parties will be able to achieve consensus. If that is not possible, additional discussions will allow for greater clarity of party positions for inclusion in the upcoming T3 Advice Letter process.

Attachment B-3

**Informal Feedback of The Utility Reform Network on IOU Proposal for Extreme
Heat Disconnections Protections**

October 20, 2025

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

Order Instituting Rulemaking to Consider New Approaches to
Disconnections and Reconnections to Improve Energy
Access and Contain Costs.

R.18-07-005
(Filed July 12, 2018)

**INFORMAL FEEDBACK OF THE UTILITY REFORM NETWORK ON IOU
PROPOSAL FOR EXTREME HEAT DISCONNECTIONS PROTECTIONS**



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sashford@turn.org October 20, 2025

INFORMAL FEEDBACK OF THE UTILITY REFORM NETWORK ON IOU PROPOSAL FOR EXTREME HEAT DISCONNECTIONS PROTECTIONS

TURN offers the following feedback on the IOU proposal for extreme heat thresholds to suspend disconnections as presented at the October 10, 2025 working group meeting. TURN attended the meeting and presented an alternative proposal. Presentation slides were shared with the working group mailing list. In summary, TURN supports establishing temperature thresholds with regional variation as one criteria for suspending disconnections, as proposed by the IOUs. However, these temperatures should have a ‘ceiling’ of no more than 95 degrees and vary on a granular regional basis. The IOUs should also implement additional criteria for protection which account for other components of extreme heat besides temperature, such as National Weather Service (NWS) heat alerts and the CalHeatScore tool.

1. Regional temperature thresholds for protections should not exceed 95 degrees.

The IOUs propose using the 98th percentile historic temperature as a threshold for suspending disconnections with regional variation (Cal Adapt), which was originally suggested by TURN as an interim basis for protections. The IOUs also proposed a floor of 85 degrees and a ceiling of 100 degrees for these thresholds, which would replace the threshold in areas with a 98th percentile historic temperature below 85 or above 100 degrees.

TURN supports regional temperature thresholds as one criteria for disconnections protections but recommends a lower absolute maximum threshold than 100 degrees. In the meeting, TURN proposed a ceiling of 95 degrees because that is currently the extreme heat threshold in Arizona, which has hotter statewide average temperatures than California.¹ In addition, the IOUs point to CalOSHA’s guidelines as the basis for an 85 degree floor, and

¹ “Final Package of Termination of Service Rules Approved,” Arizona Residential Utility Consumer Office, accessed October 20, 2025. <https://ruco.az.gov/hot-topics/disconnection-rules>

CalOSHA identifies 95 degrees as an outdoor temperature to trigger “high heat procedures.”²

TURN would also be supportive of a maximum threshold lower than 95 degrees. As UCAN noted during the meeting, extreme heat protections at California daycares take effect when indoor temperatures exceed 85 degrees. Other states already suspend disconnections at temperatures lower than 95 degrees. Illinois has a moratorium on disconnections when temperatures exceed 90 degrees,³ and Virginia 92 degrees.⁴ The 100-degree ceiling proposed by the IOUs has no apparent public health basis and is far too high to offer meaningful protection.

TURN is also concerned that stakeholders in the working group will not have sufficient opportunity to review the dataset and proposed regional breakdown before the IOUs finalize their proposal. The IOUs indicated that the 98th percentile thresholds would be based on an updated historic dataset, which has not yet been compiled, and that they would be implemented for geographic areas, which have not yet been defined. The IOUs should share this updated dataset and all details on their methodology, as requested by Cal Advocates. TURN also supports UCAN’s recommendation to establish regional temperature thresholds on a more granular basis than counties, such as Zip codes or National Weather Service (NWS) forecast zones. As discussed in TURN’s August 14, 2024 Motion: “it is important to keep in mind that local extreme heat thresholds can and do vary widely in some counties, particularly those with coastal and inland communities, so the county-level thresholds cannot be relied upon in determining how best to protect public health.”⁵

² “Cal/OSHA Heat Illness Prevention Guidance and Resources,” California DIR, accessed October 20, 2025.

<https://www.dir.ca.gov/dosh/heatillnessinfo.html>

³ 220 ILCS 5/8-205, accessed October 20, 2025.

<https://www.ilga.gov/Documents/legislation/ilcs/documents/022000050K8-205.htm> ⁴

Code of Virginia, § 56-245.1:3., accessed October 20, 2025.

<https://law.lis.virginia.gov/vacode/title56/chapter10/section56-245.1:3/>

⁵ For instance, in San Luis Obispo County, the extreme heat threshold is 85 degrees in Morro Bay and 103.3 degrees in Paso Robles. Likewise, in Humboldt County, the extreme heat threshold is 76.9 degrees in Eureka and 97.8 degrees in Garberville. <https://caladapt.org/tools/extreme-heat>.

2. The IOUs should establish additional criteria for disconnections protections which reflect other extreme heat factors besides temperature.

D.25-06-012 directs the IOUs to collaborate with parties to develop: “a proposal to lower the temperature or other relevant threshold that trigger disconnections suspensions in light of the relative heat risks identified in TURN’s Motion of August 14, 2024.” TURN’s Motion initially recommended that the Commission prohibit disconnection of residential electric service on either a temperature basis, or when the NWS “HeatRisk” tool was forecast to reach a significant risk level.⁶ The “HeatRisk” tool reflects not only temperature, but the impacts of humidity and nighttime cooling on extreme heat and public health outcomes.

TURN maintains that it is critically important to implement an additional criteria for protections which reflects these other components of extreme heat. As detailed in TURN’s Motion, temperature alone does not capture extreme heat risks, particularly for vulnerable populations. Besides the NWS HeatRisk tool, TURN presented two viable options for this additional threshold at the working group meeting: NWS heat alerts and the CalHeatScore tool. NWS heat alerts (advisories, watches, and warnings) are based on the NWS “Heat Index”⁷ which reflects felt temperature based on temperature and humidity. These alerts are issued regionally, based on thresholds set at the local level, and can also be informed by the Wet Bulb Globe Temperature and Heat Risk tools.⁸ Multiple states have established NWS heat alerts as a criteria for suspending disconnections, including Illinois,⁹ Washington,¹⁰ and Georgia.¹¹

⁶ TURN Emergency Motion, R.18-07-005, August 14, 2024.

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M537/K783/537783590.PDF>

⁷ NWS Heat Index, accessed October 20, 2025. <https://www.weather.gov/ama/heatindex>

⁸ “Heat Forecast Tools,” NWS, accessed October 20, 2025. <https://www.weather.gov/safety/heat-tools>

⁹ 220 ILCS 5/8-205, accessed October 20, 2025.

<https://www.ilga.gov/Documents/legislation/ilcs/documents/022000050K8-205.htm> ¹⁰

RCW 54.16.285, Washington State Legislature, accessed October 20, 2025.

<https://app.leg.wa.gov/RCW/default.aspx?cite=54.16.285>

¹¹ “Residential Electric Utility Service Disconnection,” State of Georgia Public Service Commission, accessed October 20, 2025. <https://psc.ga.gov/about-the-psc/consumer-corner/electric/consumer-rights/electric-disconnection/>

Another viable criteria for suspending disconnections is a risk value of three or higher according to the CalHeatScore tool. CalHeatScore calculates the risk of public health impacts (emergency room visits) from extreme heat based on the heat index at the Zip code level.¹² While the IOUs noted that this tool cannot provide data in the necessary format at this time, they indicated that the product has sustained funding and data is expected to be available in the future. TURN suggested that this tool could be implemented as an additional criteria for protections once the data is available for integration.

3. The IOUs should share additional information on customer impacts and costs.

At the past two working group meetings, TURN has requested additional details on customer impacts (in terms of days disconnected) and implementation costs for each proposed approach. TURN supports Cal Advocates' request for these details in their informal comments (recommendation #4). The IOUs should share this information to better inform stakeholders and allow for meaningful consideration of alternatives.

Respectfully submitted,

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Dated: October 20, 2025

¹² "What is CalHeatScore," CalEPA, accessed October 20, 2025. <https://calheatscore.calepa.ca.gov/>

Attachment B-4

**Informal Response to the Utility Consumers' Action Network on Modifying Existing
Temperature Thresholds for Disconnections Including the IOUS' and TURN's Proposals**

October 20, 2025

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Consider New Approaches to Disconnections
and Reconnections to Improve Energy Access
and Contain Costs.

Rulemaking. 18-07-005
(Filed July 12, 2018)

**INFORMAL RESPONSE OF THE UTILITY CONSUMERS' ACTION NETWORK ON
MODIFYING EXISTING TEMPERATURE THRESHOLDS FOR DISCONNECTIONS
INCLUDING THE IOUS' AND TURN'S PROPOSALS**



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Dated: October 20, 2025

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Consider New Approaches to Disconnections
and Reconnections to Improve Energy Access
and Contain Costs.

Rulemaking. 18-07-005
(Filed July 12, 2018)

**INFORMAL RESPONSE OF THE UTILITY CONSUMERS' ACTION NETWORK ON
MODIFYING EXISTING TEMPERATURE THRESHOLDS FOR DISCONNECTIONS
INCLUDING THE IOUS' AND TURN'S PROPOSALS**

As per the schedule proposed by the investor-owned utilities ("IOUs") during the October 10, 2025 meeting, the Utility Consumers' Action Network submits its response to the proposals of the IOUs and TURN regarding possible revisions to California's existing rules concerning when utilities can disconnect customers (with outstanding unpaid bills) during periods of extreme heat.

UCAN views the IOU's CalAdapt-based 98% threshold as an inadequate response to the significant health risks associated with prolonged heat waves, urban heat island effects, and the debilitating effects of high overnight temperatures. While the CalAdapt- based modification would be relatively easy for the IOUs to implement, it is an insufficient response to the genuine peril extreme heat poses to human health. In addition, UCAN is particularly concerned about the IOU proposal to use widely dispersed geographic areas as guideposts for threshold temperatures, e.g., the notion of using either city or county boundaries to define temperature thresholds.

County based thresholds are particularly unreasonable given the wide range of size and climatological conditions within some of California's larger counties such as Riverside, San Bernardino, and Los Angeles, along with counties such as Tulare, Madera, El Dorado, and Placer that include areas within the central valley as well as the Sierra Nevada Mountains. San Bernardino County alone includes urban nodes such as the City of San Bernardino, mountain

communities in the San Bernardino Mountains, and vast expanses of desert that extend to the State of Nevada. The same can be said of Riverside County, which extends from exurban Los Angeles to the Arizona border but also includes mountain communities. Even city-based proposals would be similarly problematic for large jurisdictions such as the cities of San Diego and Chula Vista whose boundaries include coastal as well as inland areas that have higher ambient summer and fall temperatures.

Rather than rely on huge geographic areas to define thresholds UCAN recommends using zip codes, or by using National Weather Service forecast zones. Zip codes and National Weather Service forecast zones have long been used by the IOUs, have reliable temperature records, and would be easy to implement. Using California's long-established baseline climate zones would ensure that temperature cutoff levels reflect local conditions. Extensive climate data is already available for these regions of the state.

TURN has proposed a modification of the IOU's proposal that would use the 98th percentile figure but would lower the maximum ambient temperature from 100 F to 95 F. TURN's recommendation is partly based on CalOSHA's Heat Index Prevention standard, and it aligns with some other states including Arizona. TURN also proposes that establishing other criteria to trigger the suspension of disconnections should be pursued including possibly one incorporating relative humidity and the presence or absence of nighttime cooling. While most of California does not experience high levels of humidity during summer and fall, inland areas of Southern California see high humidity during summer monsoon periods. TURN's proposal is far superior to the IOUs' proposal because it protects customers from multiple weather-related health impacts, not just temperature. UCAN views TURN's proposal as the minimum level required to protect California ratepayers. However, below, UCAN proposes revisions to

temperature thresholds (i.e., temperature and percentile thresholds). Additionally, UCAN recommends the parties and the Commission consider implementing a disconnection moratorium during the hottest portion of each year to simplify heat protections for California ratepayers.

During the October 10, 2025, working group meeting UCAN expressed the view that the IOU's 100 F ceiling temperature is too high, noting that other states with limitations on the ability of utilities to unilaterally disconnect customers use lower temperatures such as Illinois, that uses 90 F. California daycare facilities are limited to an indoor temperature of 85 F (or in extreme heat, the temperature must be 20 degrees lower than the outdoor temperature).¹ The applicable rules provide that day care licensees must ensure a comfortable temperature is maintained and defines comfort as being between 68 degrees and 85 degrees F.²

During the working group meeting, an IOU representative stated that lower temperature thresholds are typically implemented in states with a higher average relative humidity than is found in California. UCAN acknowledges that on average, the relative humidity in California is lower than the average in the U.S. However, several locations in California typically experience mid- to high-humidity during summer months. Because the IOUs' proposal lists a signal "ceiling" temperature for the state, the ceiling temperature should protect all people in the state, not just people living in low-humidity areas. The recent change in Illinois to a 90 F temperature threshold preventing utility disconnections was intended to address the impact of high humidity in some areas of the state.

The IOU's citation to the 98th percentile heat threshold is not supported by one of their citations: (Gasparrini et al., 2015) states that, "We further separated these components into

¹ California Daycare Temperature Regulations, Title 22, Div 12, Chap 1, Art 7 - Child Care Centers, (https://www.cdss.ca.gov/Portals/9/Regs/Man/CCL/6cccman.docx?ver=powRm_gxe17oLCEwgOCxNQ%3d%3d). ² *Ibid.*

moderate and extreme contributions by defining extreme cold and heat as temperatures lower than the 2.5th location-specific percentile (extreme cold) and higher than the 97.5th location-specific percentile (extreme heat). These cutoffs are consistent with previous definitions of extreme weather, such as heatwaves. We defined moderate temperatures as the ranges between the optimum temperatures and these cutoffs. We defined other ranges using cutoffs at the 10th, 25th, 50th, 75th, and 90th percentiles.”³

Considering Gasparrini’s research and the practices of other states, UCAN recommends a 96th percentile heat threshold for banning disconnections to ensure at least a minimum margin for safety.

The following is a summary of other states’ temperature disconnections bans thresholds. ⁴

- Illinois: As of 2024, utility companies are barred from disconnections if the forecast for the next 24 hours is 90 F or above. The ban also applies when a National Weather Service excessive heat watch, heat advisory, or excessive heat warning is in effect.
- Missouri: The “Hot Weather Law” is in effect from June 1 to September 30. It prohibits disconnections when the National Weather Service predicts a temperature over 95 F or a heat index above 105 F.
- Virginia: Effective July 2024, state law prohibits disconnections when the outside temperature is 92 F or higher.
- Arizona: Some regulated utilities will not disconnect residential customers from June 1 to October 15, or when the forecasted temperature exceeds 95 F. (Note Arizona is the second least humid state in the U.S. California, while generally not known for humidity, still has a significant number of days when the heat index will exceed 105 F in inland locations.)

³ Mortality risk attributable to high and low ambient temperature: a multicountry observational study
Gasparrini, Antonio et al. The Lancet, Volume 386, Issue 9991, 369 – 375,
[https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(14\)62114-0/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(14)62114-0/fulltext).

⁴ Note many of these states have bans for extreme cold weather periods as well.

- Louisiana: Utilities are prohibited from disconnecting service during extreme heat, which includes when the National Weather Service issues a heat advisory (often when temperatures reach 103 F or the heat index reaches 108 F).
- Texas: The Texas PUC bans disconnections by their IOUs during a heat advisory. Some individual utilities, such as Austin Energy, set their own stricter rules, banning disconnections when the heat index is forecasted to be 102 F or above.

One other approach to the disconnections problem would be to simply ban disconnections altogether during the summer and early fall months. For example, California could simply ban disconnections from June 1 through October 15. Utility regulators in Arizona provide this option to regulated utilities in that state and three utilities have opted for this disconnection moratorium during days that could experience heat waves.⁵ This would protect customers from health- threatening disconnections during the months when California experiences its most extreme summer temperatures. A calendar-based approach has several advantages including being easy and low-cost to implement and would not require the collection of location-based temperature data. Further, the IOUs would still be allowed to disconnect customers for non-payment during the shoulder seasons when temperature-related danger from disconnections is extremely low. The shoulder seasons include much of the year.

/s/ Jason Zeller

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Dated: October 20, 2025

⁵ Arizona Corporation Commission, ACC Reminds Ratepayers of Utility Disconnection Ban During Extreme Heat (June 3, 2024), <https://azcc.gov/news/home/2024/06/03/acc-reminds-ratepayers-of-utility-disconnection-ban-during-extreme-heat>.

Attachment B-5

UCAN's Extreme Heat Protection Proposal

November 7, 2025

Utility Consumers' Action Network (UCAN)

Proposal: Disconnection-Related Extreme Heat Protections

Date: November 7, 2025

UCAN Proposal: Ban disconnections when the National Weather Service (NSW) forecasts a temperature of 90 degrees or higher for any time during the following 72-hours.

- Proposal details:
 - Ban disconnections when NWS forecasts =>90 degrees within the following 72-hours.
 - Forecast zones: IOUs to use the same zones as used in their current disconnection threshold system.
- Benefits:
 - Protects Californians from negative health impacts of extreme summer heat
 - Near-zero cost to implement
 - Easy to implement
 - Requires updating the current 100-degree temperature threshold to 90 degrees
 - Significantly easier to implement than any other proposal
 - Simple to understand (important for customer education)
 - Provides protection during dangerous conditions not covered at the current threshold.
 - Enables year-round disconnections, which are important for minimizing ratepayer costs. Year-round disconnections also appear to be important to the Joint IOUs.
- Drawbacks:
 - A 90-degree threshold results in a 106-degree heat index at 70% relative humidity.³
 - Threshold temperature is significantly higher than the 82-degree trigger for Cal OSHA indoor temperature standards.⁴
 - Threshold temperature is higher than the 85-degree maximum indoor air temperature for California daycare facilities.⁵
 - Threshold temperature is higher than the 85-degree floor temperature proposed by the Joint IOUs, which appears to be the Joint IOUs' proposed safe temperature at any humidity (see Joint IOUs' October 10, 2025 proposal, p. 9).
 - Allows disconnections during short-term cool spells even though hot temperatures are forecast to resume.
- Additional Information:
 - To provide better protection during high humidity events, the proposed temperature is lower than the current 100-degree cap.
 - UCAN does not propose the NWS heat index as the threshold metric because the heat index is not available for 72 hours ahead.
 - The 90-degree threshold aligns with Illinois's temperature threshold, which is one of Illinois's heat protection thresholds.⁶ Illinois lowered the threshold from 95 degrees to 90 degrees, in part, to address the increased health risks on high humidity/high temperature days. High levels of humidity in California can be found in areas affected by summer monsoons in Southern California such as Imperial, San Diego, Riverside, and San Bernardino Counties.

³ NOAA Heat Index Chart, https://www.noaa.gov/sites/default/files/2022-05/heatindex_chart_rh.pdf

⁴ Cal OSHA, ("On June 20, 2024, the Occupational Safety and Health Standards Board approved California Code of Regulations, Title 8, section 3396, "Heat Illness Prevention in Indoor Places of Employment". This standard applies to most workplaces where the indoor temperature reaches 82°F. It establishes required safety measures for indoor workplaces to prevent worker exposure to risk of heat illness. This standard went into effect on July 23, 2024."), <https://www.dir.ca.gov/dosh/heat-illness/indoor-faq.html>.

⁵ California Daycare Temperature Regulations, Title 22, Div 12, Chap 1, Art 7 - Child Care Centers, (https://www.cdss.ca.gov/Portals/9/Regs/Man/CCL/6cccman.docx?ver=powRm_gxe17oLCEwgOCxNQ%3d%3d).

⁶ The Illinois threshold protection is supplemented by NWS excessive heat watch, heat advisory, or excessive heat warning, <https://www.ilga.gov/documents/legislation/103/HB/10300HB1541eng.htm>

Attachment C-1

**Cfor AT & NCLC Feedback on Extreme Heat Proposals from Extreme Weather
Protections Working Grooup Meeting #3**

November 17, 2025

**CforAT & NCLC Feedback on Extreme Heat Proposals from Extreme Weather
Protections Working Group Meeting #3
November 17, 2025**

Following the October 10, 2025 Working Group Meeting and submission of feedback, the Joint IOUs informed stakeholders that they would consider the feedback in developing their final IOUs' proposal and that they would include a summary of party positions in their December 17, 2025 Advice Letter filing. In order to make additional efforts to develop a consensus proposal or to further narrow differences among the parties ahead of the Advice Letter filing, CforAT and other Working Group participants requested an additional Working Group Meeting. The goal of this meeting was for the IOUs to provide additional information discussed at the previous meeting, to address parties' substantive questions, and to work towards refining and reaching greater consensus on a proposal to implement extreme heat protections. The IOUs agreed and held Working Group Meeting #3 on November 12, 2025, which CforAT and NCLC attended. We appreciate the work that went into developing the updated IOU proposal based on a 98th percentile approach and in presenting three options for extreme heat protections for parties' consideration.

The IOUs shared three potential options for expanding disconnection protections to reduce heat risk. The first option is an interim solution of lowering the existing temperature threshold. While this approach does not meet the D.25-06-012 requirements of region-specific thresholds or consider criteria beyond temperature, the IOUs stated that it is easy and low-cost to implement.

As stated in our prior feedback, to the extent that any proposal incorporates short-term temperature adjustments based on the existing system, CforAT and NCLC believe that the threshold should not exceed 95°F and would oppose the IOUs' proposed threshold of 98°F. The 95°F threshold is consistent with disconnection rules in Arizona, which is generally hotter than California and whose population is presumably better acclimated to heat. As discussed in prior meetings and feedback, the 98°F threshold does not appear to have any empirical basis or consistency with other heat standards. Even 95°F may pose heat risk for some individuals, including vulnerable populations such as people with medical needs or disabilities. The IOUs should set the threshold at no higher than 95°F and prioritize expanding protections, particularly for a potential interim solution that would only be in place until a more refined approach can be implemented.

The second option proposed by the IOUs is an updated 98th percentile approach, which uses a daily average temperature percentile methodology for locations expected to fall between an 85 floor and 100 ceiling and incorporates consideration of temperature over the course of a day and indirectly accounts for humidity. The IOUs conveyed that this approach would expand disconnection protections and add approximately 7 disconnection-restricted days. CforAT and

NCLC's understanding is that the spatial level for this approach differs across IOUs with zip codes for PG&E and SCE and subregions for SDG&E. The IOUs characterized the cost of implementation as "medium," with the complexity of the implementation process varying across IOUs.

The third option proposed by the IOUs would utilize CalHeatScore analysis and apply disconnection protections by zip code when the CalHeatScore value is 3 or higher. The IOUs stated that an API tool for CalHeatScore is expected to be available sometime in summer 2026. However, the timing is uncertain, and implementation will require additional time once data is available, with the complexity of this process varying across IOUs. The IOUs also noted that they have been given a deadline in May of 2026 to increase protections, and that there is no possibility that the tool will be developed in time to meet this deadline.

The IOUs stated that the cost of implementation of this proposal would be relatively high. In response to questions from CforAT, the IOUs conveyed that they can potentially speed up the implementation process by making preparations in advance of receiving the data and coordinating with the CalHeatScore team.

The IOUs stated that they could adopt an interim solution and then transition to the CalHeatScore option when it becomes available, but they opposed adoption of the updated 98th percentile approach as an interim solution. Instead, they proposed using options 1 and 3 in order to avoid the higher combined implementation costs that would come with the adoption of both option 2 and option 3. CforAT and NCLC recognize the need to implement a solution for the May 2026 deadline, as well as the need to adopt a refined approach that considers multiple criteria and regional differences. We believe that the IOUs should determine their approach based on the availability of API from CalHeatScore.

At this time, CforAT and NCLC propose the following approach to expanding existing extreme heat protections:

- The IOUs should specify a "drop-dead date," representing the latest possible date at which the IOUs could receive the API from CalHeatScore and be prepared to implement use of this tool for summer 2027. The IOUs should coordinate with CalHeatScore to determine the implementation process and how IOUs can best-position themselves to quickly launch once tool is available.
- Begin by implementing the first option of lowering the existing temperature threshold as an interim solution to meet May 2026 deadline and expand heat protections in the near-term. The new temperature threshold should be set at 95°F or lower.
- Implement the third option of CalHeatScore if the required API becomes available before or by the "drop-dead date." The IOUs should provide more information to determine the appropriate value for triggering disconnection restrictions.

- Implement the second option of the 98th percentile approach if the API from CalHeatScore is not available by the “drop-dead date” (or if the IOUs learn earlier that it will not be available for summer 2027 implementation). This is an appropriate plan to move beyond the interim solution in the event that CalHeatScore is not ready for use for multiple summers.

CforAT and NCLC appreciate the opportunity to provide these comments. We request that the IOUs incorporate parties’ feedback to adopt a more expansive and comprehensive extreme heat approach and continue to collaborate with parties by addressing substantive questions and providing updated information as it develops.

Attachment C-2

TURN Informal Feedback on 11/12/25 Working Group Meeting

November 17, 2025

TURN Informal Feedback on 11/12/25 Working Group Meeting

R.18-07-005 (Extreme Heat Disconnections Protections Working Group)

TURN appreciates the IOUs convening an additional meeting and expanding their proposal to consider other factors besides temperature which impact extreme heat, as recommended by TURN's proposal and parties' comments to the working group.

TURN supports (1) adopting a lower temperature threshold, and (2) implementing the CalHeatScore as an additional threshold when the API is available. Thereafter, TURN disagrees with the IOU proposal to phase out the temperature threshold. TURN supports maintaining both a temperature threshold and CalHeatScore threshold simultaneously, in line with other states which have multiple independent criteria for protections. This will also offer sustained protections in the event that there are future funding or technological changes affecting the CalHeatScore tool.

For (1) the reduced temperature threshold, TURN strongly opposes the IOUs' proposal to only lower the temperature threshold to 98 degrees statewide. The IOUs have not provided any data or standards to support this cut-off point, while parties including TURN have presented facts supporting a lower threshold at 90 degrees, in line with Illinois, or 95 degrees, in line with Arizona. TURN recommends that this threshold be set at 90 degrees statewide, as proposed by UCAN, or vary regionally (at the Zip Code/NWS forecast zone level) based on historical temperatures up to a ceiling of 95 degrees. The IOUs have not provided any support for their claim that establishing regional temperature thresholds is too complex or expensive to implement in combination with the CalHeatScore approach.

For (2) the CalHeatScore approach, TURN supports implementing the tool when the API is available. In the joint advice letter, TURN requests that the IOUs present additional information on the implications of suspending disconnections at different risk levels to determine whether a 3+ risk score is the appropriate cut-off, as opposed to a lower score. Parties have not had an opportunity to review this data closely prior to this point.

TURN also requests that the IOUs provide additional details and analysis in their advice letter on each of the proposed alternatives. The IOUs have not presented any cost estimates besides "low, medium, and high." The IOUs have also not provided information to analyze the change in protected days for any of the proposed approaches besides the 98th percentile historic temperatures, although even this analysis uses a time window and geographic granularity which the IOUs propose modifying.

Attachment C-3

UCAN's Feedback to Working Group 3 Meeting

November 17, 2025

UCAN was unable to attend WG meeting #3 due to scheduling conflicts. After reviewing the slides for meeting #3, UCAN provides the following feedback:

- UCAN's one-page proposal should be viewed as UCAN's current position on the optimal implementation for a disconnection ban during extreme heat events. UCAN believes its proposal minimizes costs and ensures customer safety.
- Meeting #3, slide 4 states "IOUs are supportive of deferring implementation until CalHeatScore becomes available, at which point IOUs propose applying protections when the CHS value is 3 or higher signifying high impact level."
 - UCAN opposes deferred implementation unless UCAN's 90 degree threshold is used prior to implementation of CalHeatScore.
 - UCAN opposes a threshold corresponding to a CHS value of 3. A CHS value of 3 does not sufficiently protect Californians. If CalHeat Score is used, the value should not exceed CHS value 2. Even under CHS value 2, the emergency

department visits can increase 33% to 66% compared to "average conditions," which is a significant increase in emergency department visits.

- When the IOUs file their advice letter proposing extreme heat protections, UCAN requests that the IOUs provide an analysis showing the percentage of customers that would have been protected from disconnections during the 2024 peak summer months (June-September) for each day and for each IOU service territory corresponding to three of the parties' proposals: UCAN, TURN, and the Joint IOUs.

Thank you,

Tyson Siegele

Principal Consultant, Clean Energy

Strategies 917-771-2222

Attachment D

Working Group Meeting Materials

Working Group Meeting #1

PROPOSAL ADJUSTING TEMPERATURE THRESHOLDS THAT TRIGGER DISCONNECTIONS SUSPENSIONS

August 28, 2025

AGENDA

- Introductions
- Background
- Proposal Guidelines
- Overview of Potential Proposal Options
- Discussion
- Next Steps

BACKGROUND

- ▶ On August 14, 2024, The Utility Reform Network (TURN) filed an *Emergency Motion to Modify Weather-Related Disconnections Protections to Better Address "Extreme Heat" Health and Safety Risks*, which was denied on procedural grounds by the assigned Commissioner's ruling on October 14, 2024
- ▶ D.25-06-012 directed the Large IOUs to develop, in collaboration with Cal Advocates, TURN, CforAT, and NCLC, and any other interested parties to the proceeding, a proposal to lower the temperature or other relevant thresholds that trigger disconnections suspension in light of the relative heat risks identified in TURN's motion

PROPOSAL GUIDELINES

- ▶ The proposal shall identify regions in each Large IOU's territory that should have a lower temperature threshold to suspend disconnections then propose region specific thresholds
- ▶ The Large IOUs must jointly file the proposal via a Tier 3 Advice Letter within six months of the issuance date of the decision, which will be on or before 12/17/25
- ▶ The approved proposal must then be implemented before May 1, 2026
- ▶ The proposal need not be a consensus among all stakeholders; the Advice Letter should identify major issues where stakeholders disagree and allow each stakeholder to succinctly explain their position
- ▶ The Commission will seek proposals that have a targeted focus on reducing customers' relative heat exposure, that rely on data and tools that are proven and consistently available, and minimize cost and burden of implementation

POTENTIAL OPTIONS FOR PROPOSAL

PROPOSAL	PROS	CONS
Lowering the heat threshold to <100 degrees	Leverages existing IOU processes, quicker to implement, can be easily modified should future changes be adopted	Not region specific; Does not incorporate non-temperature related impacts
Lowering the heat threshold to <100 degrees, with regional differences	Leverages some existing IOU processes, quicker to implement, can be easily modified should future changes be adopted	Does not incorporate non-temperature related impacts
Utilizing HeatRisk Tool	Would not require IOUs to conduct additional calculations	Still experimental, unclear whether tool will be available long term as funding is uncertain
Utilizing CalHeatScore Tool	Local to California, would not require IOUs to conduct additional calculations, likely to be more reliable due to long term funding	Still in development, website does not have a data feed yet, which would make for difficult implementation

OVERVIEW OF PUBLICLY AVAILABLE TOOLS MEASURING HEAT RELATED RISKS

NWS Heat Risk Product

The NWS HeatRisk is designed to:

- Identify periods of unusual heat for a particular location, which would potentially lead to negative impacts including heat stress and heat illness.
- Forecast heat risk out daily to a full week horizon.

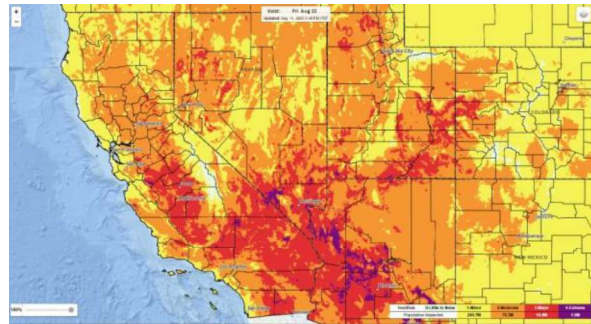
The data used are:

- National Weather Service temperature forecasts
- Temperature climatology
- CDC modeled heat health thresholds (varies regionally)

Resolution is primarily a function of weather forecast (top right).

Benefit: Easy to use, good accessibility, regional basis, scientifically sound.

Limitation: Not guaranteed to remain operational.



HeatRisk Values	Risk of Heat Effects	Levels of Heat Concern
When HeatRisk is this value:	...the risk of heat effects are:	...as symbolized by this color:
0	Little to None	Green
1	Minor	Yellow
2	Moderate	Orange
3	Major	Red
4	Extreme	Magenta

CalHeatScore Product

The CalHeatScore Product is designed to:

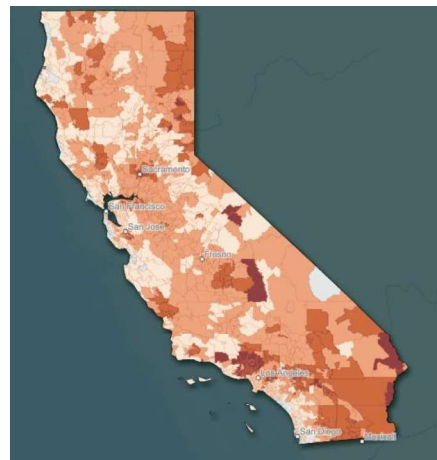
- Identify periods of unusual heat for a particular zip code that may lead to elevated visits to Emergency Departments (ED).
- Forecast heat risk out daily to a full week horizon.

Data/Basis:

- Weather forecast output is used to calculate forecast Relative Risk (RR) representing the relative change in ED visit rates for a given day and zip code compared to average conditions.
 - $RR = 1$, no change from normal
 - $RR > 1$, increased chances of ED visit
 - $RR < 1$, decreased chances of ED visit
- Correlated to past ED visit rates
- Forecast data used is from the National Weather Service and extends daily out to seven days.

Benefit: Scientifically sound, regional basis

Limitation: Poor accessibility for use in automation (no API), less resolution than NWS Heat Risk.



CalHeatScore (CHS) Rank	Corresponding RR ranges
CHS 0	$0 < RR \leq 1$
CHS 1	$1 < RR \leq 1.333$
CHS 2	$1.333 < RR \leq 1.667$
CHS 3	$1.667 < RR \leq 2$
CHS 4	$2 < RR$

98th Percentile Temperature as a threshold (Cal Adapt)

- Cal Adapt defines an extreme heat day as when the 98th percentile maximum climatological temperature is exceeded
- Cal Adapt uses observations from 1961 – 1990 to define the 98th percentile temperatures provided in TURN's response (August 2024, right).
- Most counties in California have a 98th percentile temperature below 100F, which is the current threshold for disconnection.
- The 98th percentile for a local area could be used as the new disconnection threshold, with the areal basis up for further discussion.
 - County
 - California Energy Commission Climate zones
 - National Weather Service forecast zones (granular microclimates)

Benefit: Would not require extensive external data, regionally based, accepted extreme heat measure, linked to increased ED visits in San Francisco

Limitation: Need to define an aggregation, more up to date climatology may need to be defined (e.g. 1991-2020)

County	Extreme Heat Threshold (°F)	County	Extreme Heat Threshold (°F)
Alameda County	92.7	Orange County	93.4
Alpine County	82.3	Placer County	93.3
Amador County	96.8	Plumas County	90.6
Butte County	100.1	Riverside County	106.0
Calaveras County	98.3	Sacramento County	102.6
Colusa County	101.9	San Benito County	94.7
Contra Costa County	96.6	San Bernardino County	105.7
Del Norte County	76.8	San Diego County	96.1
El Dorado County	92.4	San Francisco County	85.2
Fresno County	94.3	San Joaquin County	101.6
Glenn County	100.9	San Luis Obispo County	90.3
Humboldt County	83.2	San Mateo County	85.7
Imperial County	111.2	Santa Barbara County	87.5
Inyo County	100.8	Santa Clara County	92.7
Kern County	100.8	Santa Cruz County	90.0
Kings County	104.4	Shasta County	97.4
Lake County	97.1	Sierra County	88.9
Lassen County	91.9	Siskiyou County	91.4
Los Angeles County	94.4	Solano County	100.2
Madera County	96.1	Sonoma County	93.9
Martin County	94.4	Stanislaus County	101.2
Mariposa County	94.7	Sutter County	104.2
Merced County	90.0	Tehama County	92.2
Mendocino County	101.8	Trinity County	93.9
Madera County	92.4	Tulare County	92.9
Mono County	84.4	Tuolumne County	88.6
Monterey County	92.5	Ventura County	88.8
Napa County	98.6	Yolo County	103.2
Nevada County	92.2	Yuba County	101.2

DISCUSSION

Operational Concerns:

What are the potential challenges in implementing different proposals for new weather protections by the May 1, 2026 deadline?

Are certain proposals more robust/less prone to fail (e.g., data availability issues)?

In the case of data availability issues, should a fallback temperature threshold be used?

Cost and Burden:

What are the potential costs associated with implementing the new temperature thresholds, and how can they be minimized?

How can we balance the need to reduce customers' heat exposure with the goal of minimizing the cost?

Additional Considerations:

Which geographic areas should underly the regional variations in thresholds?

Are there any other factors or data points that should be considered when determining the temperature thresholds for disconnection suspensions?

NEXT STEPS

- Schedule WG Meeting #2
- Follow up items from WG Meeting #1
- IOUs to begin drafting Tier 3 Advice Letter

Working Group Meeting #2

Proposal Adjusting Temperature Thresholds that Trigger Disconnections Suspensions

Working Group
Meeting #2
October 10, 2025

Agenda

- Working Group Meeting #1 Recap
- IOU Proposal – 98th Percentile
- Other Party Proposals
- Discussion
- Next Steps

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Heat Protections Proposal Options from Working Group Meeting #1

PROPOSAL	PROS	CONS	TIMELY IMPLEMENTATION	COST TO IMPLEMENT
Lowering the heat threshold to <100 degrees	Leverages existing IOU processes, quicker to implement, can be easily modified should future changes be adopted	Not region specific; Does not incorporate non-temperature related impacts	Yes	Low
Lowering the heat threshold to <100 degrees, with regional differences	Leverages some existing IOU processes, quicker to implement, can be easily modified should future changes be adopted	Does not incorporate non-temperature related impacts	Yes	Low
Utilizing HeatRisk Tool	Would not require IOUs to conduct additional calculations	Still experimental, unclear whether tool will be available long term as funding is uncertain	Yes	Moderate to High
Utilizing CalHeatScore Tool	Local to California, would not require IOUs to conduct additional calculations, likely to be more reliable due to long term funding	Still in development, website does not have a data feed yet, which would make for difficult implementation	No	Moderate to High

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TURN's Motion

- Extreme heat risks arise when temperatures are much higher than normal for a specific location
 - Cal-Adapt Extreme Heat tool measures extreme heat days and nights at the 98th percentile of historical temperatures (1961 -1990).
- Extreme heat definitions all tie extreme heat to historical local average temperatures
 - Human bodies are generally acclimated to temperatures to which they are accustomed and need time to safely acclimatize to significant temperature increases
- The current heat threshold does not sufficiently address extreme heat risks in parts of the state where extreme heat events occur below 100 °F

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The IOUs propose to use the 98th Percentile Temperature as a threshold (Cal Adapt)

- TURN proposed this as an interim protection method
- IOUs investigated this method and determined that it is the best permanent option in the absence of readily available, fully reliable heat impact metrics
- Meets decision requirements of regional variation + low cost
 - "This proposal shall identify regions in each Large IOU's territory that should have a lower temperature threshold to suspend disconnections then propose region specific thresholds" (D.2506-012, p.35)
 - "The Commission will seek proposals that have a targeted focus on reducing customers' relative heat exposure, that rely on data and tools that are proven and consistently available, and minimize cost and burden of implementation" (D.2506-012, p.35)
- Impacts:
 - Greatly expands protections in more moderate climate zones
 - Ties in with existing IOU processes for heat protections, enabling rapid implementation by May 1, 2026
 - Can be combined with existing 3day look ahead period and 100°F absolute limit for enhanced protections

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Background and Method Overview: 98th Percentile Temperature

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98th Percentile Temperature as a threshold (Cal Adapt)

- Cal Adapt defines an extreme heat day as when the 98th percentile maximum climatological temperature is exceeded ([Cal-Adapt](#))
- Cal Adapt uses observations from 1961 – 1990 to define the 98th percentile temperatures provided in TURN's response (August 2024, right).
- Most counties in California have a 98th percentile temperature below 100F, which is the current threshold for disconnection.
- The 98th percentile of a local area could be used as the new disconnection threshold, with the areal basis up for further discussion.
 - County
 - California Energy Commission (CEC) Climate zones
 - National Weather Service (NWS) forecast zones (granular microclimates)

Benefit: Easy to implement, regionally based, accepted extreme heat measure, linked to increased ED visits in San Francisco

Limitation: Need to define an aggregation, more up to date climatology may need to be defined (e.g. 1991-2020)

County	Extreme Heat Threshold (°F)	County	Extreme Heat Threshold (°F)
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Contra Costa County	96.6	San Bernardino County	105.7
Del Norte County	76.8	San Diego County	96.1
El Dorado County	92.4	San Francisco County	85.2
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Kings County	104.4	Shasta County	97.4
Lake County	97.1	Sierra County	88.9
Lassen County	91.9	Siskiyou County	91.4
Los Angeles County	94.4	Solano County	100.2
Madera County	96.1	Sonoma County	93.9
Marin County	94.4	Stanislaus County	101.2
Mariposa County	94.7	Sutter County	104.2
Mendocino County	90.0	Tehama County	99.2
Merced County	101.8	Trinity County	93.9
Modoc County	92.4	Tulare County	92.9
Mono County	84.4	Tuolumne County	88.6
Monterey County	92.5	Ventura County	88.8
Napa County	98.6	Yolo County	103.2
Nevada County	92.2	Yuba County	101.2

98th Percentile Temperature as a threshold (Cal Adapt)

- This method stems from several studies regarding heat waves and their impact on health (sf.gov, 2023).
- A 2006 California heat wave was found to increase heat related emergency department visits throughout most of the Bay Area ([Knowlton et al., 2008](#)).
- Another study looking at worldwide heat waves found that mortality increases around the 99th percentile, with illness impacts beginning around the 97th - 98th percentile ([Gasparrini et al., 2015](#)).
- Cal-Adapt's approach was developed in 2017, which is why they use the 1961 – 1990 climatology ([Cal-Adapt, 2017](#)).
- The 98th percentile is similar to statistical downscaling techniques used by climate models and provides a clear benchmark encompassing all areas at risk ([Cal-Adapt, 2017](#)).



IOU proposal for enhancements to the 98th percentile method

- Updating data - The historical data from the Cal-Adapt Extreme Heat tool is dated, from 1961-1990. Thresholds will be recalculated using more recent climatology data
- Implementing a ceiling - For hotter regions, where the 98th percentile is higher than the existing threshold of 100°F, the threshold will remain at 100°F pursuant to D.20-06-003
- Implementing a floor - For colder regions, where the 98th percentile may not constitute increased heat risk (e.g. high elevations, coasts), a floor threshold of 85°F shall be utilized to avoid unnecessary restrictions on disconnections in moderate climate zones
 - Based on CalOSHA's Heat Illness Prevention standards
- Spatial aggregation – IOUs are still discussing the appropriate level of granularity (e.g., by city, zip code)

Illustrative Example:

City Level 98th Percentile Temperatures Method for the SCE territory

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Methods

- Used a downscaled climatological dataset (2km resolution) over SCE territory
 - Variables: Daily Mean Max Temperature at 2m Above Ground OR Daily Max Temperature at 2m Above Ground
 - Pulled years 1991 – 2020 to find the most recent climatology
 - Found the 98th percentile at various aggregation levels
 - County (Daily Mean Max Temp)
 - CEC Climate Zone (Daily Mean Max Temp)
 - NWS Forecast Zone (Daily Mean Max Temp)
 - City (Daily Max Temp)
 - Pulled years 2021 – 2024 to create a backcast with the following results:
 - Number of days meeting or exceeding 98th percentile threshold
 - Number of days meeting or exceeding 100F
 - Percentage increase
 - The illustrative analysis is shown at the "city" level, which is the current aggregation level for heat protections in SCE's billing system

City Level 98th Percentile Max Temps and Backcast 2021 - 2024

City	98 th Percentile Max Temp (degF)	No. Days >= 98 th Percentile (degF)	No. Days >= 100F (degF)
Acton	98	58	24
Adelanto	102 Exceeds Ceiling	60	95
Agoura	99	33	30
Agoura Hills	99	30	23
Agua Dulce	98	55	20
Aguanga	100	37	36
Alhambra	98	22	15
Aliso Viejo	92	23	4
Alta Loma	100	36	36
Altadena	98	28	17
Amboy	112 Exceeds Ceiling	55	371
Anaheim	96	21	9
Angelus Oaks	88	67	0
Anza	97	49	12
Apple Valley	100 Exceeds Ceiling	61	67
Arcadia	101 Exceeds Ceiling	24	27
Armona	106 Exceeds Ceiling	55	199
Arrowbear Lake	79 Under Floor	8 days using 85F floor	0
Artesia	95	17	9
Atwood	97	22	11
Auberry	97	59	30

For illustrative purposes only, subject to change

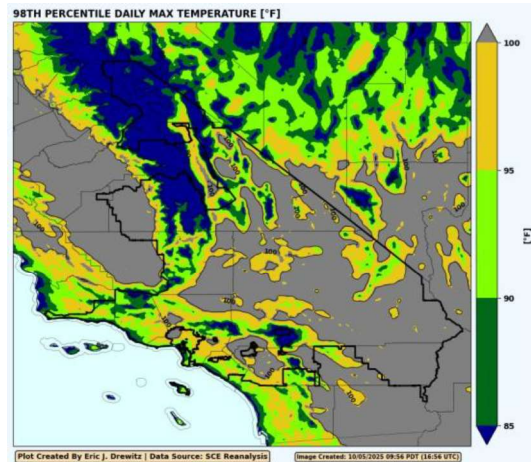
- Coastal and cooler valley areas see a significant rise in days with protections
- Many hot inland valleys and desert areas maintain the ceiling of 100F and remain the same level of protection
 - Ex: In Amboy, 112F is the new threshold, but this decreases the days under protection and anything above 100F is still considered to have heat risk
- Mountain and coastal areas also see a rise in days with protections, but with the floor value of 85F, these rises are not as significant
- The sample size for days is 1461 days (4 years), so to obtain average annual protections, divide the number by 4
- Gray highlights represent locations exceeding the 100F ceiling, blue highlights represent locations under the 85F floor
- 41% of SCE cities are above the 100F ceiling
- 10% of SCE cities are below the 85F floor

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City Level 98th Percentile Max Temps and Backcast 2021 - 2024

City	98 th Percentile Max Temp (degF)	No. Days >= 98 th Percentile (degF)	No. Days >= 100F (degF)
Avalon	88	16	4
Azusa	101 Exceeds Ceiling	23	29
Baker	111 Exceeds Ceiling	55	357
Bakersfield	106 Exceeds Ceiling	62	226
Balboa	80 Under Floor	8 days using 85F floor	0
Baldwin Hills	100 Exceeds Ceiling	20	22
Banning	100 Exceeds Ceiling	52	61
Barstow	105 Exceeds Ceiling	59	210
Bear Valley	87	76	0
Beaumont	100 Exceeds Ceiling	57	60
Bell	96	19	10
Bell Canyon	100 Exceeds Ceiling	36	36
Bell Gardens	97	19	11
Bellflower	96	17	10
Benton	92	55	0
Beverly Hills	92	19	7
Big Bear City	80 Under Floor	14 days using 85F floor	0
Big Bear Lake	80 Under Floor	3 days using 85F floor	0
Big Creek	84 Under Floor	54 days using 85F floor	0
Big Pine	99	63	36
Bishop	99	60	43



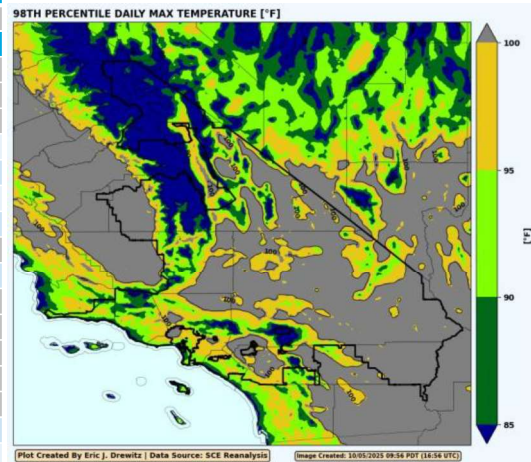
For illustrative purposes only, subject to change

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City Level 98th Percentile Max Temps and Backcast 2021 - 2024

City	98 th Percentile Max Temp (degF)	No. Days >= 98 th Percentile (degF)	No. Days >= 100F (degF)
Bloomington	103 Exceeds Ceiling	35	106
Blue Jay	84 Under Floor	42 days using 85F floor	0
Blythe	113 Exceeds Ceiling	43	398
Bodfish	100 Exceeds Ceiling	67	80
Boron	103 Exceeds Ceiling	62	137
Bradbury	100	25	22
Brea	97	19	12
Brea Canyon	97	22	14
Bridgeport	86	57	0
Bryn Mawr	103 Exceeds Ceiling	49	106
Buena Park	96	20	10
Cabazon	105 Exceeds Ceiling	54	181
Cadiz	111 Exceeds Ceiling	51	355
Calabasas	102 Exceeds Ceiling	26	75
Caliente	101 Exceeds Ceiling	70	101
California City	103 Exceeds Ceiling	59	134
Calimesa	100	55	52
Camarillo	93	21	3
Camp Nelson	85	66	0
Canoga Park	103 Exceeds Ceiling	35	95
Cantil	105 Exceeds Ceiling	61	224



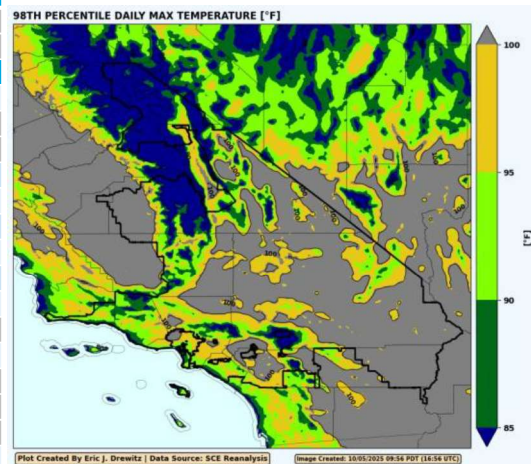
For illustrative purposes only, subject to change

Energy for What's Ahead®

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City Level 98th Percentile Max Temps and Backcast 2021 - 2024

City	98 th Percentile Max Temp (degF)	No. Days >= 98 th Percentile (degF)	No. Days >= 100F (degF)
Canyon Country	102 Exceeds Ceiling	41	79
Canyon Lake	103 Exceeds Ceiling	53	104
Carpinteria	80 Under Floor	14 days using 85F floor	0
Carson	92	18	4
Castaic	101 Exceeds Ceiling	39	63
Cathedral City	112 Exceeds Ceiling	42	386
Cedar Glen	86	64	0
Cedar Pines	87	59	0
Century City	91	19	4
Cerritos	96	19	9
Chalfant	98	63	29
Chalfant Valley	93	63	1
Chatsworth	102 Exceeds Ceiling	21	68
Cherry Valley	98	57	27
China Lake	105 Exceeds Ceiling	62	205
Chino	102 Exceeds Ceiling	26	57
Chino Hills	100 Exceeds Ceiling	23	26
Cima	95	57	16
City of Commerce	97	20	12
City of Industry	100	22	21
Claremont	100	32	25



For illustrative purposes only, subject to change

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Other Party Proposals

TURN Proposal for Heat Thresholds Triggering Disconnections Suspensions

R.18-07-005: Extreme Heat Disconnections Suspensions
Working Group Meeting #2
October 10, 2025



TURN believes we can and should live in a society where power, broadband,
and phone service are treated as basic human rights for all families.

Background

- D. 25-06-012 directs the IOUs to collaborate with parties to develop: “a proposal to lower the temperature or other relevant threshold that trigger disconnections suspensions in light of the **relative heat risks** identified in TURN’s Motion of August 14, 2024.”
- In addition to a temperature threshold, TURN’s Motion proposed adopting the National Weather Service (NWS) **Heat Risk** score of 3+ as a second criteria to trigger disconnections suspensions.
 - Reflects **regional variation**
 - Factors in **humidity, nighttime cooling, and heat-health** thresholds

TURN
THE UTILITY REGULATOR OF NORTHERN CALIFORNIA

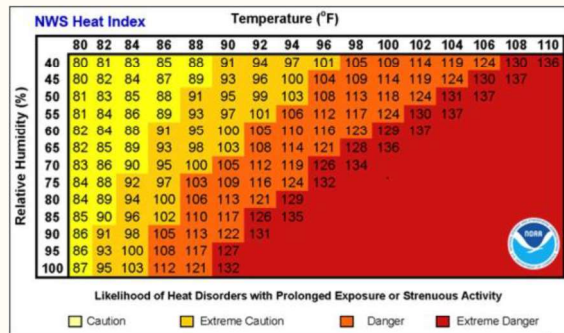
TURN Proposal

- (1) Support IOU proposal to establish regional temperature thresholds as **one criteria** to trigger suspensions based on historic data.
- Recommend a maximum threshold of 95°, instead of IOUs’ proposed 100°.
 - Aligns with CalOSHA’s Heat Illness Prevention standards
 - Aligns with other states including Arizona
- Recommend establishing **additional criteria** to trigger suspensions which reflect other factors besides temperature, including humidity and nighttime cooling, which impact health outcomes.

TURN
THE UTILITY REGULATOR OF NORTHERN CALIFORNIA

TURN Proposal

- (2) Suspend disconnections on any day when the NWS issues a heat advisory, extreme heat watch, or extreme heat warning for a given area.
 - Criteria vary regionally based on the heat index, which reflects humidity, and nighttime cooling
 - Heat Advisory: High heat index (e.g. mid-90s to mid-100s)
 - Extreme Heat Watch/Warning: Forecast/active extreme heat index (e.g. 105+ for 2+ days)
 - Aligns with other states including WA, MN, GA, IL



TURN
THE UTILITY NETWORK

TURN Proposal

- (3) Suspend disconnections on any day when the CalHeatScore reaches level 3+, once the data is available for integration.
 - Based on heat index, which reflects humidity, and the risk of rising emergency room visits at the Zip Code level.
 - California-specific tool with future funding and development plans.

Recommended Criteria	IOU Proposal	TURN Proposal
The suspension threshold should vary regionally to reflect the relative impact of high temperatures	✓	✓
The suspension threshold should reflect other factors besides temperature, such as humidity and nighttime cooling , which impact 'apparent temperature' and health outcomes	✗	✓

TURN
THE UTILITY NETWORK

Summary

- Recommend multiple implementable criteria to expand protections.
 - IOUs agree regional temperature thresholds are implementable, with a maximum threshold. 95° ceiling is implemented in other states.
 - NWS alerts implemented as a threshold in other states.
 - Future availability of the CalHeatScore tool.
- Next steps: Request discussion of this proposal, including implementation details and cost estimates, by IOUs.

Thank You

Discussion

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Next Steps

- All parties review IOU proposal and provide feedback by 10/20/25
- IOUs to begin drafting Tier 3 Advice Letter
- IOUs to summarize party comments from Working Group Meetings and share with WG members for review

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Appendix

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Background

- ▶ On August 14, 2024, The Utility Reform Network (TURN) filed an *Emergency Motion to Modify Weather -Related Disconnections Protections to Better Address "Extreme Heat" Health and Safety Risks*, which was denied on procedural grounds by the assigned Commissioner's ruling on October 14, 2024
- ▶ D.25-06-012 directed the Large IOUs to develop, in collaboration with Cal Advocates, TURN, CforAT, and NCLC, and any other interested parties to the proceeding, a proposal to lower the temperature or other relevant thresholds that trigger disconnections suspension in light of the relative heat risks identified in TURN's motion

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Proposal guidelines

- ▶ The proposal shall identify regions in each Large IOU's territory that should have a lower temperature threshold to suspend disconnections then propose region specific thresholds
- ▶ The Large IOUs must jointly file the proposal via a Tier 3 Advice Letter within six months of the issuance date of the decision, which will be on or before 12/17/25
- ▶ The approved proposal must then be implemented before May 1, 2026
- ▶ The proposal need not be a consensus among all stakeholders; the Advice Letter should identify major issues where stakeholders disagree and allow each stakeholder to succinctly explain their position
- ▶ The Commission will seek proposals that have a targeted focus on reducing customers' relative heat exposure, that rely on data and tools that are proven and consistently available, and minimize cost and burden of implementation

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Thank
you

PROPOSAL ADJUSTING TEMPERATURE THRESHOLDS THAT TRIGGER DISCONNECTIONS SUSPENSIONS

Working Group Meeting #3

November 12, 2025

WORKING GROUP FEEDBACK 10/20

	95° Ceiling	85° Floor	Incorporate Other Factors (Humidity & Overnight Cooling)	Supportive of an interim solution until long term solution is available	Zip Codes or NWS forecast zones	96th Percentile	Moratorium June 1- October 15	NWS Alerts	CalHeatScore	HeatRisk	Indoor Temperature Considerations	Requested Data
CforAT & NCLC	X	X	X	X					X			
UCAN	X*		X		X	X	X				X	
TURN	X	X	X	X	X			X	X**	X	X	X
Cal Advocates	X		X	X						X	X (82°)	X

*90° is preferred

** CHS value of three or higher

UCAN's Proposal Submitted 11/7/25

- Ban disconnections when the National Weather Service (NWS) forecasts a temperature of 90 ° or higher during a 72-hour lookahead period
- Easy to implement, IOUs to use existing forecast zones in place for current 100 ° mandate
- Enables year -round disconnections, which help minimize ratepayer costs

Availability of CalHeatScore Summer 2026

- IOUs have been informed by OEHHA that development of a data warehouse for CalHeatScore as well as an API is underway, and should be available sometime next summer
- IOUs are supportive of deferring implementation until CalHeatScore becomes available, at which point IOUs propose applying protections when the CHS value is 3 or higher signifying high impact level
- With uncertainty around timing, IOUs are exploring several solutions
 - *Lower existing threshold*
 - *The 98th percentile method*
 - *CalHeatScore , when available*

UPDATED IOU PROPOSAL 98TH PERCENTILE APPROACH

Updated Methodology

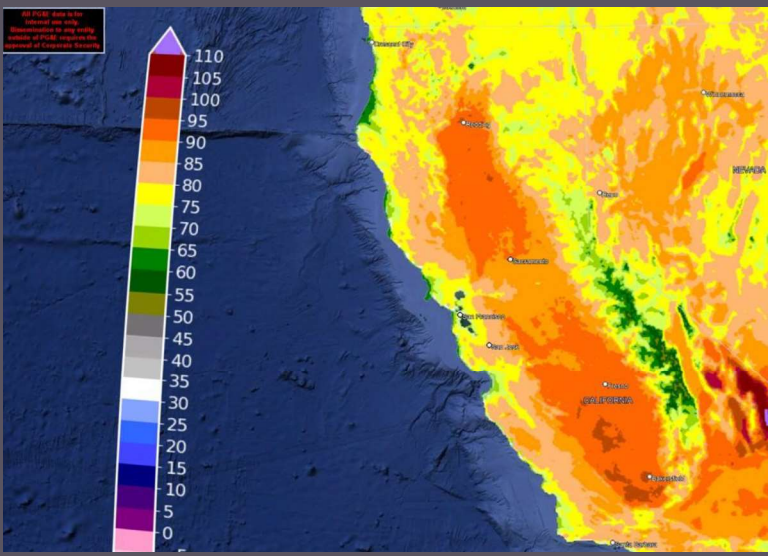
To address concerns related to humidity and overnight cooling, the IOUs have modified the previous 98th percentile approach as outlined below:

- Use of a **daily average temperature percentile methodology** for locations that are expected to fall between the bracketed temperatures (85° floor and 100° ceiling)
 - Average the high and low temperature either hourly, or 3 hourly temperatures to compute 98th percentile values for entire service territories

Why this works?

- Captures an understanding of the temperature over the entirety of the day
- Indirectly accounts for humidity by accounting for overnight lows, which are typically elevated during more humid summer days

98th percentile temperature plot for Northern and Central California using hourly temperatures to calculate the daily average



Desired Outcomes

- Expanded protections to reduce heat risk
- Low implementation costs
- Minimize ratepayer impacts

		Meets Requirements	Ease of Implementation	Cost of Implementation
Option 1*	Lowering the existing threshold	No	Very easy	Little to no cost
Option 2	98th percentile	Yes	Complexity varies across IOUs	Medium
Option 3**	CalHeatScore	Yes	Complexity varies across IOUs	High

*Option 1 is an interim solution and proposed for immediate implementation until CalHeatScore is available.
**Option 3 will require additional time to implement once the data is available for testing and deployment.

Proposal Timeline & Next Steps

Date	Milestone
6/17/2025	Decision Issuance
8/28/2025	Working Group Meeting #1
10/10/2025	Working Group Meeting #2
11/12/2025	Working Group Meeting #3
11/24/2025	Finalize Summary of Party Positions
12/17/2025	Tier 3 Advice Letter Filing
5/1/2026	Proposal Implementation

QUESTIONS?

ATTACHMENT 4

TURN Protest to SCE Advice Letter 5707-E et al., 1/6/26.

*This document is already in the record of R.18-07-005 as it was attached to the Joint Consumer Advocates Emergency Motion to Modify Weather-Related Disconnection Protections to Better Address “Extreme Heat” Health and Safety Risks, filed 5/28/26. TURN attaches it separately to this claim to avoid confusion with other references to the Emergency Motion.



January 6, 2026

CPUC Energy Division
Attn: ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102
EDTariffUnit@cpuc.ca.gov

Re: Protest of The Utility Reform Network of The Joint IOUs' Advice Letter (SCE Advice Letter No. 5707-E et al.) to Propose Region-Specific Heat Risk Protections Pursuant to D.25-06-012

Dear Energy Division,

On December 17, 2025, Southern California Edison Company (SCE) on behalf of Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas) submitted for filing Advice Letters 5707-E (SCE), 7783-E (PG&E), 4770-E (SDG&E), and 6570-G (SoCalGas). Pursuant to D.25-06-012 in R.18-07-005, the Disconnections OIR, the Joint Investor-Owned Utilities' (IOUs') Advice Letter (Joint AL) proposes new extreme heat thresholds to suspend residential customer disconnections.

The Utility Reform Network (TURN) reviewed these filings and respectfully submits this protest of the Joint AL. The IOUs' proposal does not go far enough to protect customers from the relative health risks of extreme heat. The Joint AL would suspend disconnections for customers in a given ZIP code when the CalHeatScore (CHS) index¹ exceeds level 3 in a 72-hour forecast window.² However, due to delays in CHS data accessibility, the proposal would fail to establish protections by the May 1, 2026 deadline required by D.25-06-012. In the meantime, the IOUs propose to maintain the existing statewide temperature threshold of 100 degrees for suspending disconnections. While TURN generally supports use of the CHS tool because it assesses relative health risks, the Joint AL does not provide sufficient information to evaluate the appropriate CHS risk level to incorporate, contrary to repeated requests by the stakeholder working group.

Given these shortcomings with the IOUs' proposal, as well as the urgency of implementing meaningful extreme heat protections before summer 2026, TURN recommends that the Commission partially adopt the proposals presented in the Joint AL while requiring the following modifications:

- Approve an interim and “fallback” statewide temperature threshold of 90 degrees or, alternatively, no higher than 95, rather than the IOUs' proposed 100 degrees, to satisfy the requirements of D.25-06-012 until the CHS data interface is available.

¹ CalHeatScore is a heat risk ranking system operated by the California Office of Environmental Health Hazard Assessment, available at: <https://calheatscore.calepa.ca.gov/>

² Joint AL, pp. 6-7.

- Require PG&E and SDG&E to develop a ZIP code-based process prior to CHS availability, on the same timeline as SCE, to minimize implementation delays.
- Approve extreme heat thresholds based on a CHS risk level 3 on an interim basis, until the Commission can evaluate the relative impacts of using CHS risk levels 2 and 3. Require the IOUs to provide a comparison of disconnections impacts from establishing protections at CHS risk levels 2 and 3, to ensure the final approved approach meaningfully expands protections relative to the existing 100-degree threshold.
- Require the IOUs to provide a forecast of implementation costs in a follow-up compliance advice letter.

The Commission directed the IOUs to develop a proposal for extreme heat protections in collaboration with a stakeholder working group.³ While the proposal need not be a consensus among all parties in the working group, prior feedback indicates that *all* parties besides the IOUs find the 100-degree threshold insufficient as an interim or fallback measure. All parties supported a ceiling of 90 or 95 degrees for regional temperature thresholds,⁴ which suggests support for an equivalent or lower ceiling for a statewide threshold.

1. The IOUs’ proposal would unacceptably delay implementation of additional protections to mitigate the health risks of extreme heat.

Assuming the CHS data interface is available in May 2026, SCE anticipates that it could implement the new extreme heat thresholds by August or September 2026.⁵ SDG&E and PG&E anticipate implementation by November 2026.⁶ Thus, implementation by all IOUs would not take effect until six months *after* the May 1, 2026 deadline established by D.25-06-012.⁷ In the interim, the IOUs propose maintaining the existing 100-degree disconnections moratorium. If there is an additional delay in the release of the CHS data interface or Commission decision on the Joint AL, the IOUs expect additional implementation delays.⁸ This outcome seems possible given that the CHS team plans to make the data interface available by “summer 2026”,⁹ which could be as late as August 2026 – potentially delaying IOU implementation until February 2026.

This proposed implementation delay, and the absence of any interim improvement for customers in summer 2026, is unacceptable. D.25-06-012 directed the IOUs to develop “a proposal to lower the temperature or other relevant thresholds that trigger disconnections suspension in light of the relative health risks identified in TURN’s Motion of August 14, 2024.”¹⁰ TURN’s Motion highlighted the increasingly frequent, severe, and long-lasting occurrence of extreme heat in

³ Joint AL, p. 4; D.25-06-012, p. 35.

⁴ Joint AL, Attachment A, p. 5. In feedback provided on 10/20/25, CforAT, NCLC, UCAN, TURN, and Cal Advocates all supported a “ceiling” of 90 or 95 degrees for the temperature threshold to trigger disconnections.

⁵ Joint AL, pp. 10-11.

⁶ Joint AL, pp. 11-12.

⁷ D.25-06-012, p. 35.

⁸ Joint AL, p. 9.

⁹ Joint AL, p. 7.

¹⁰ D.25-06-012, p. 35.

California, and the critical importance of electricity access to power fans and air conditioners, in order to ensure health and safety at high summertime temperatures.¹¹

D.25-06-012 established that this proposal “*must*” be implemented by May 1, 2026,¹² which would ensure protections are in place before the hottest months of the year. The Commission recognized the “growing need for these protections”¹³ and set an objective to “reduce disconnections in areas that experience heat events.”¹⁴ Thus, the IOUs’ proposal fails to comply with the Decision, postponing urgently needed protections despite increasing health and safety risks. Underscoring this concern, global climate forecasts already predict that 2026 will be one of the hottest years on record, bringing more extreme weather and longer heatwaves worldwide.¹⁵

2. Require the IOUs to implement an interim and “fallback” temperature threshold of 90 degrees or at most 95 degrees.

The stakeholder working group discussed options for interim measures to account for relative heat risk before the CHS approach can be implemented. These included regional thresholds based on 98th percentile historic temperatures, and National Weather Service heat alerts,¹⁶ which trigger disconnections suspension in states such as Washington, Georgia, and Illinois.¹⁷ At the final working group meeting, the IOUs proposed lowering the statewide temperature threshold as a straightforward interim measure.¹⁸ It is unclear why the Joint AL does not reflect this proposal, when all parties support some improvement from the current 100-degree threshold. While the IOUs contend that a multi-phased approach would be costly, simply lowering the statewide temperature threshold would incur a “near-zero” implementation cost, as noted by UCAN.¹⁹

The Commission should require the IOUs to implement a lower interim temperature threshold of 90 degrees, or at most 95 degrees, for disconnections suspension if the CHS approach cannot be implemented by the May 1, 2026 deadline. This cut-off should also serve as the “fallback” basis for protections if CHS data is unavailable at any point after implementation.

TURN previously proposed 95 degrees as the ceiling for regional temperature thresholds, based on the existing threshold in Arizona, a state with even hotter average summer temperatures than California.²⁰ However, TURN’s proposal would have also suspended disconnections at far lower

¹¹ “Emergency Motion of The Utility Reform Network to Modify Weather-Related Disconnection Protections to Better Address ‘Extreme Heat’ Health and Safety Risks” (August 14, 2024), R.18-07-005, p. 1.

¹² D.25-06-012, p. 35, emphasis added.

¹³ D.25-06-012, p. 46.

¹⁴ D.25-06-012, p. 2.

¹⁵ “2026 outlook,” UK Met Office, December 18, 2025. <https://www.metoffice.gov.uk/about-us/news-and-media/media-centre/weather-and-climate-news/2025/2026-outlook-likely-another-year-above-1.4c>

¹⁶ Joint AL, Attachment A, p. 4.

¹⁷ Joint AL, Attachment B-3, p. 3.

¹⁸ Joint AL, Attachment D, p. 24 (Slide “Desired Outcomes”: “*Option 1 is an interim solution proposed for immediate implementation until CalHeatScore is available”).

¹⁹ Joint AL, Attachment A, p. 6.

²⁰ Joint AL, Attachment D, p. 15 (TURN Proposal); “Final Package of Termination of Service Rules Approved,” Arizona Residential Utility Consumer Office, October 20, 2025. <https://ruco.az.gov/hot-topics/disconnection-rules>

temperatures in cooler regions of the state, and incorporated criteria reflecting humidity and nighttime cooling – other factors known to exacerbate health risk during extreme heat events.

Given that a statewide temperature threshold fails to account for both regional temperature differences and the non-temperature factors which exacerbate health risks, a threshold of 90 degrees is appropriate to protect households in mountainous and coastal areas. According to the state's Cal-Adapt climate tool, the extreme heat threshold is below 100 degrees in 41 of 58 counties (71%), and at or below 90 degrees in 14 counties (24%).²¹ San Francisco County defines an extreme heat event as any day when temperatures exceed 85 degrees.²² Further north, Del Norte County faces extreme heat when temperatures exceed 76.8 degrees.²³ Within counties, local cut-offs also vary and can be significantly lower than the county-level threshold.²⁴

A threshold of 90 degrees is also reasonable because it is aligned with other extreme heat standards. Illinois has a statewide moratorium on electric disconnections when temperatures exceed 90 degrees, or the National Weather Service issues a heat alert for a given area, which can occur at temperatures below 90 degrees.²⁵ As UCAN notes, California daycare regulations define safe indoor temperatures as up to 85 degrees.²⁶ Per Cal Advocates, the California Division of Occupational Safety and Health (CalOSHA) safety guidelines initiate high heat procedures at 80 degrees for indoor workplaces, which can occur when outdoor temperatures are lower than 80 degrees.²⁷ While a statewide 90-degree threshold is appropriate as a fallback measure for these reasons, TURN urges the Commission to at least adopt a fallback threshold no higher than 95 degrees, consistent with Arizona's approach.

Finally, it is worth noting that while parties provided data on relative health risks and examples of existing policies to support a lower temperature threshold, the Joint AL does not offer any evidence to support continuation of the 100-degree standard on an interim or fallback basis.

3. Require PG&E and SDG&E to develop a ZIP code-based process prior to CHS availability, on the same timeline as SCE, to minimize implementation delays.

SCE anticipates that it can implement the CHS tool within 3 or 4 months of data interface availability, compared to 6 months for SDG&E and PG&E.²⁸ The reason for this difference

²¹ See Cal-Adapt – Extreme Heat Days & Warm Nights tool, providing extreme heat thresholds for cities and counties throughout California, <https://cal-adapt.org/tools/extreme-heat>. “Emergency Motion of The Utility Reform Network to Modify Weather-Related Disconnection Protections to Better Address ‘Extreme Heat’ Health and Safety Risks” (August 14, 2024), R.18-07-005, p. 9.

²² City and County of San Francisco, “Extreme Heat and Health” (May 17, 2023), <https://www.sf.gov/reports/may-2023/extreme-heat-and-health>.

²³ See Cal-Adapt, <https://cal-adapt.org/tools/extreme-heat>

²⁴ For example, in San Luis Obispo County, the extreme heat threshold is 85 degrees in Morro Bay and 103.3 degrees in Paso Robles. Likewise, in Humboldt County, the extreme heat threshold is 76.9 degrees in Eureka and 97.8 degrees in Garberville. See Cal-Adapt, <https://cal-adapt.org/tools/extreme-heat>

²⁵ 220 ILCS 5/8-205. <https://www.ilga.gov/Documents/legislation/ilcs/documents/022000050K8-205.htm>.

²⁶ Joint AL, Attachment B-5 (UCAN), p. 1.

²⁷ §3395, “Heat Illness Prevention in Outdoor Places of Employment.” <https://www.dir.ca.gov/title8/3395.html>; Joint AL, Attachment B-1 (Cal Advocates), p. 2.

²⁸ Joint AL, pp. 10-12.

appears to be SCE's plan to transition to a ZIP-code basis for implementing disconnections protections for 1 to 2 months prior to CHS data availability.²⁹ Neither PG&E nor SDG&E provide an explanation for why they are unable to take the same steps as SCE to prepare for full implementation, as soon as the Joint AL is approved. The Commission should require all the IOUs to take proactive steps to develop a ZIP-code based process so that they can implement CHS protections as soon as possible, once the data interface becomes available.

4. Require the IOUs to present an analysis of impacts from suspending disconnections at CHS risk level 2 or 3 to inform future implementation of the CHS threshold.

The Joint AL would suspend disconnections whenever the CHS reaches a risk level 3 ("high impact").³⁰ The IOUs contend that this level – which corresponds to a 66%+ increase in emergency room visits – is appropriate because it reflects significant health risks from extreme heat. However, as UCAN notes, a CHS value of 2 can indicate up to a 66% increase in emergency department visits, which still reflects a substantial increase in risk.³¹ As a CHS draft data interface was not yet available during the working group process, parties have not had an opportunity to review past data from the CHS tool and evaluate its impacts on disconnection days relative to the existing temperature threshold.

In comments, TURN, Cal Advocates, and UCAN requested that the IOUs provide estimates of the additional days with suspended disconnections stemming from its final proposal.³² The IOUs have not presented this information in their Joint AL, nor have they provided it to the stakeholder working group members. The IOUs should be directed to present an analysis which estimates these impacts when establishing the protections threshold at CHS risk level 2, level 3, and the current 100-degree threshold. Without this comparison, the Commission does not have sufficient information to assess whether the IOUs' proposal to use CHS risk level 3 will achieve the reduction in relative heat risks intended by D.25-06-012. In the absence of this analysis, the Commission should approve protections beginning at CHS risk level 3 on an interim basis, with the intent to evaluate whether risk level 2 would be more appropriate once the IOUs provide the necessary analysis.

5. Require the IOUs to provide a forecast of implementation costs.

The Joint AL emphasizes that the IOUs' proposal would be low cost to implement. As a third-party tool, using CalHeatScore "is cost-effective because it minimizes the need for internal data processing."³³ SCE and SDG&E respectively state that "[b]udget projections show minimal

²⁹ Joint AL, p. 10.

³⁰ Joint AL, p. 7.

³¹ Joint AL, Attachment A, p. 7.

³² Joint AL, Attachment B-3 (TURN), p. 4: "At the past two working group meetings, TURN has requested additional details on customer impacts (in terms of days disconnected)... for each proposed approach."; Attachment B-1 (Cal Advocates), p. 4: "The IOUs should quantify how their proposal changes the number of days in which disconnections are prohibited when compared to the current threshold."; Attachment C-3 (UCAN), p. 1: "When the IOUs file their advice letter proposing extreme heat protections, UCAN requests that the IOUs provide an analysis showing the percentage of customers that would have been protected from disconnections."

³³ Joint AL, p. 6.

incremental costs” and “[b]udget projections reflect minimal incremental costs.”³⁴ PG&E, however, does not discuss budget projections and instead anticipates “an increase in manual work for the development of connection and automation with the new CHS API.”³⁵

Before the IOUs are authorized to record incremental costs to their disconnection memorandum accounts, the IOUs should provide forecasts of implementation costs. Both TURN and Cal Advocates previously requested that the IOUs include implementation cost details with their proposal.³⁶ Considering each IOU will be switching their geographic basis for extreme weather protections from city or sub-region to ZIP code,³⁷ it is unclear why implementation costs would differ for PG&E. The IOUs should provide budget projections in comparable formats and justify any differences between forecasts in a follow-up compliance advice letter.

6. Conclusion

In sum, the IOUs’ proposal fails to improve protections by the deadline, as it would maintain the 100-degree threshold for disconnections suspension through summer 2026. The Commission should approve an interim and “fallback” temperature threshold of 90 degrees, or alternatively, no higher than 95 degrees. TURN supports the IOUs’ proposal to implement extreme heat protections based on the CHS tool, with the caveat that data is needed to identify the appropriate risk level for suspending disconnections to improve protections relative to the existing criteria.

TURN appreciates your attention to this important matter. Please feel free to contact us if you have any questions.

Sincerely,

Sylvie Ashford, Energy & Climate Policy Analyst

The Utility Reform Network

360 Grand Avenue, #150. Oakland, CA 94610

(415) 248-8442

sashford@turn.org

CC: Connor Flanigan, Vice President, State Regulatory Operations (SCE), Adam Smith, Director, Regulatory Relations (SCE), Sidney Dietz, Director, Regulatory Relations (PG&E), Greg Anderson, Regulatory Tariff Manager (SDG&E), Veronica Arroyo, Regulatory Tariff Manager (SoCalGas)

Service List of R.18-07-005

³⁴ Joint AL, p. 11.

³⁵ Joint AL, p. 12.

³⁶ Joint AL, Attachment B-3 (TURN), p. 4: “At the past two working group meetings, TURN has requested additional details on...implementation costs for each proposed approach.”; Attachment B-1 (Cal Advocates), p. 4: “Please describe the additional costs of implementing multiple criteria.”

³⁷ Joint AL, pp. 10-12.

ATTACHMENT 5

Joint IOU Request for Extension of Time to Comply with D.25-06-012, 4/20/26

April 20, 2026

VIA ELECTRONIC MAIL

Leuwam Tesfai
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Request of Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Gas Company, and Southern California Edison Company for Extension of Time to Comply with Decision (D.) 25-06-012

Dear Executive Director Tesfai:

Pursuant to Rule 16.6 of the California Public Utilities Commission (Commission or CPUC) Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E), on behalf of itself and San Diego Gas & Electric Company (SDG&E), Southern California Gas Company (SoCalGas), and Southern California Edison Company (SCE) (collectively, the Joint IOUs), respectfully requests a six month extension of time to comply with Decision (D.) 25-06-012, *Decision Addressing Requirements of Senate Bill 1142 and Extreme Heat Disconnections Protections*.

Background

On June 12, 2025, the Commission issued D.25-06-012, directing utilities to develop additional disconnection safeguards for extreme heat events in coordination with interested parties. Ordering Paragraph (OP) 4 requires the IOUs to jointly submit a Tier 3 Advice Letter within six months of the decision, proposing adjusted “heat-triggered” disconnection thresholds. Additionally, the decision orders implementation of the approved proposal by May 1, 2026.¹²

On December 17, 2025, the Joint IOUs submitted AL 5707-E, 4770-E, 7783-E, and 6570-G (the Joint AL), proposing the CalHeatScore tool as a single measure option for relative heat risk protection. Within the AL, the IOUs included various implementation timelines ranging from 3-6 months, which would begin when the Application

¹ D.25-06-012, pp. 35.

² Although OP 4 of D.25-06-012 also names SoCalGas, as a gas utility SoCalGas is only subject to the current 32° cold weather protection threshold under CoL 8 of D.20-06-003. For the same reason, the Electric IOUs are limiting this extension request to electric implementation of D.25-06-012 requirements only.

Programming Interface (API) for the CalHeatScore tool becomes available or when the Commission issues its resolution, whichever is later.

On April 17, 2026, the Commission requested that the Joint IOUs withdraw the Joint AL and re-submit it with a new proposal.

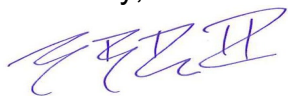
Reasons for Extension Request

As the IOUs noted in the Joint AL, the Commission could, through a Resolution, elect to modify the schedule such that the implementation timeline begins upon the latter of the CalHeatScore API becoming available or Commission approval of the Joint AL via Resolution.

However, given that the Commission has yet to issue a Proposed Resolution to the Joint AL, and has requested the IOUs re-submit the Joint AL, the IOUs will be unable to meet the mandated implementation timeline of May 1, 2026.³

For this reason, PG&E, on behalf of itself and the Joint IOUs, respectfully requests a six month extension from the date the Commission issues a Resolution approving the Joint AL to comply with the requirements of D.25-06-012.

Sincerely,



Sidney Bob Dietz II

cc: aljextensionrequests@cpuc.ca.gov
Isaac Tong, Energy Division
Paul Phillips, Energy Division
Yvonne Pena (YPena1@semprautilities.com), SoCalGas, SDG&E
Adam Smith (adam.smith@sce.com), SCE
Service List R.18-07-005

³ Pursuant to D.25-06-012, pp. 35; the approved proposal must be implemented before May 1, 2026. The IOUs have not received approval of the submitted proposal.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served true copy of Pacific Gas and Electric Company **Rule 16.6 Request for Extension of Time to Comply with D.25-06-012**, to all known parties listed on official service list for Docket No. R.18-07-005, obtained from CPUC website, by electronic mail (email) to all with valid email address.

A copy was also provided by email to:

aljextensionrequests@cpuc.ca.gov

Paul.Phillips@cpuc.ca.gov

Isaac.Tong@cpuc.ca.gov

YPena1@semprautilities.com

adam.smith@sce.com

Executed on April 20, 2026, in Hercules, California.

/s/ Maria Osorio

Maria Osorio

ATTACHMENT 6

Meeting Request Form Submitted by TURN to the Office of Commissioner Houck, 4/29/26

Meeting Request Form

Office of Commissioner Darcie L. Houck



California Public
Utilities Commission

Main Office
415-703-3703

Please download this form before filling out.

Today's date: 4/29/26

Contact information for the person requesting the meeting:

Name: Sylvie Ashford

Organization: The Utility Reform Network (TURN)

Phone: 415-248-8442

Email: sashford@turn.org

I/We would like to meet with:

☐ Commissioner ☐ Advisor ☒ Advisor if the Commissioner is unavailable

Topic for the meeting. Please check all that apply:

☒ Energy ☐ Communications ☐ Transportation ☐ Water ☐ Safety ☐ Other

Reason for the meeting (please check all that apply):

☐ Meet and greet

☒ Discuss an open proceeding

Proceeding category: ☒ Quasi-Legislative ☐ Ratesetting

Proceeding number and description: R.18-07-005 (Disconnections Rulemaking)

☐ Discuss an item on the Commission meeting agenda

Date of meeting:

Item number and description:

Additional information for meeting request (please be specific):

On 4/20/2026, the Joint IOUs requested a 6-month extension to comply with the extreme heat disconnections protections required by D.25-06-012, citing a Commission request to withdraw Joint Advice Letter 5707-E et al., As members of the extreme heat working group, TURN and CforAT are respectfully seeking information on the Commission's concerns and intent to implement protections for summer 2026.

List your meeting attendee(s) by name, organization and title:

Sylvie Ashford (TURN, Energy & Climate Policy Analyst), Melissa Kasnitz (CforAT, Legal Director)

Type of meeting: ☐ By phone | ☒ Virtual | ☐ In person: ☐ San Francisco ☐ Sacramento

Proposed dates and time of meeting:

Thursday April 30, 2026 between 9am-5pm; Friday May 1, 2026 between 9am-5pm; Wednesday May 6, 2026, between 9am-10am or 11am-5pm.

Will the meeting trigger *ex parte* restriction or reporting requirement pursuant to Rule 8.3 of the [Commission's Rules of Practice and Procedure](#)? ☐ Yes ☒ No

OFFICE USE ONLY:

☐ Non-Report

☐ Report

Scheduled for:

Attendees:

IMPORTANT. Please take these calendaring considerations into account when completing this form:

- The party or individual requesting an *ex parte* meeting in ratesetting matters must provide notice of the meeting to all parties to the proceeding at least three working days ahead of the meeting. Post meeting notices shall be filed no more than three working days after the communication. Additional requirements may be found in the Commission's Rules of Practice and Procedure and relevant proceeding rulings.
- Individual *ex parte* meetings in ratesetting proceedings are not permitted within three business days of the Commission's scheduled vote on a proposed decision in that proceeding.
- Meetings are not permitted on matters related to Adjudicatory, Enforcement, Rehearing or Complaint proceedings.
- In addition to any notification required by the [Commission's Rules of Practice and Procedure](#), please e-mail all *ex parte* meeting notices and reports to: Houck.Exparte@cpuc.ca.gov

Submit completed form to Darcie.Houck@cpuc.ca.gov, Audrey.Neuman@cpuc.ca.gov, Kerriann.Sheppard@cpuc.ca.gov, Lydia.Park@cpuc.ca.gov and Vira.Eison@cpuc.ca.gov

Submission of this form does not guarantee a meeting with the Commissioners or their advisors.

This speaker request form and any materials provided during the event are subject to the California Public Records Act.

ATTACHMENT 7

TURN et al. Comments on Draft Resolution E-5468, 6/29/26

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

Order Instituting Rulemaking to Consider New
Approaches to Disconnections and
Reconnections to Improve Energy Access and
Contain Costs

Rulemaking 18-07-005
(Filed July 12, 2018)

**COMMENTS OF THE JOINT CONSUMER ADVOCATES ON
DRAFT RESOLUTION E-5468 ISSUED IN RESPONSE TO SCE AL 5707-E ET AL.,**

HAYLEY GOODSON
SYLVIE ASHFORD

Managing Attorney for
THE UTILITY REFORM NETWORK
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Dated: June 29, 2026

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**COMMENTS OF THE JOINT CONSUMER ADVOCATES ON DRAFT RESOLUTION
E-5468 ISSUED IN RESPONSE TO SCE AL 5707-E ET AL.,**

I. INTRODUCTION

On June 22, 2026, the Energy Division of the California Public Utilities Commission issued Draft Resolution E-5468 in response to SCE AL 5707-E, PG&E AL 7783-E, SDG&E AL 4770-E, and SoCalGas AL 6570-G (“Joint AL”). The Draft Resolution approves, with meaningful modifications, new statewide extreme heat disconnections protections proposed by the Joint AL.¹ The Draft Resolution would require the investor-owned utilities (IOUs) to halt disconnections for residential electricity customers when the CalHeatScore (CHS) Index reflects a risk score of Level 2 or higher for the customer’s zip code in a 72-hour lookahead period.² Until this can be implemented, and as an ongoing fallback measure if the CHS Index becomes unavailable for any reason, the Draft Resolution directs the IOUs to halt disconnections when local temperatures exceed 90° Fahrenheit (F).

Pursuant to Rule 14.5 of the Commission’s Rules of Practice and Procedure, and parties’ stipulation to a shortened 7-day response period, the Joint Consumer Advocates (The Utility Reform Network, Center for Accessible Technology, National Consumer Law Center, and Utility Consumers’ Action Network) submit these timely comments on the Draft Resolution. The Joint Consumer Advocates greatly appreciate and strongly urge the adoption of the Draft Resolution, which will strengthen life-saving protections for residential customers from the health and safety risks of extreme heat. To fully effectuate the Draft Resolution, the Joint Consumer Advocates propose the following modest revisions:

¹ Draft Resolution, p. 1.

² Draft Resolution, p. 14.

1. Acknowledge the Joint Consumer Advocates' Emergency Motion dated May 28, 2026, which called for immediate Commission action to lower the temperature threshold for disconnections protections over summer 2026.
2. Clarify that the IOUs should implement the interim threshold of 90° F for halting disconnections immediately upon issuance of the resolution.
3. Direct the IOUs to implement the CHS Level 2 protections within six months of resolution's issuance, in light of the fact that the CHS application programming interface (API) was released on May 21, 2026.
4. Instruct the IOUs to include a summary of CHS implementation costs in their first Tier 1 Advice Letter compliance filing.

II. PROPOSED CLARIFICATIONS

First, the "Background" section of the Draft Resolution should be expanded to note that the Joint Consumer Advocates filed an Emergency Motion in R.18-07-005 on May 28, 2026. The Emergency Motion called for immediate Commission action to lower the temperature threshold for suspending disconnections and highlighted the urgent need for enhanced extreme heat protections in summer 2026.³ Specifically, the Emergency Motion urged the Commission to direct the IOUs to immediately lower the statewide temperature threshold for suspending disconnections from 100°F to 90°F. The Joint Consumer Advocates concurrently filed a motion to shorten time in order to facilitate a rapid resolution of the matter.⁴ On June 10, 2026, the

³ R.18-07-005, "Emergency Motion of the Joint Consumer Advocates to Modify Weather-Related Disconnection Protections to Better Address "Extreme Heat" Health and Safety Risks," May 28, 2026.

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M607/K785/607785658.PDF>

⁴ R.18-07-005, "Motion of the Joint Consumer Advocates to Shorten Time to Respond to the Emergency Motion on Extreme Heat," May 28, 2026. <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M607/K364/607364702.PDF>

Public Advocates Office and the Joint IOUs each submitted responses to the Emergency Motion. The Draft Resolution errs by omitting these procedural facts and should be updated accordingly.

Second, the resolution should clarify that the IOUs must implement the interim threshold of 90° F (within a 72-hour lookahead period) immediately. The proposed language states that “this resolution is effective today,”⁵ but does not specify a timeline for IOU implementation. The IOUs must implement increased protections as soon as possible. Californians are at risk of facing severe heat waves this summer, as highlighted in the Joint Consumer Advocates’ Emergency Motion, as well as Governor Newsom’s May 21, 2026 press release on health and safety concerns related to extreme heat.⁶ The IOUs have previously acknowledged that a reduced statewide temperature threshold is viable for “immediate implementation” with near-zero implementation costs.⁷ The interim solution will not require any new data architecture, as the IOUs can utilize the same weather forecasting data and 72-hour lookahead period informing their current process. To this end, the second ordering paragraph of the Draft Resolution should be modified to direct the IOUs to implement the interim and fallback threshold of 90 degrees “immediately.”

Third, the Commission should acknowledge the recent release of the CHS application programming interface (API) and direct the IOUs to implement protections based on CHS Level 2 within six months of the resolution’s issuance. Decision (D.) 25-06-012, the decision directing the IOUs to develop new extreme heat protections, ordered that the new protections must include

⁵ Draft Resolution, p. 15.

⁶ “Governor Newsom expands access to life-saving CalHeatScore, a cutting-edge tool to keep Californians safe during extreme heat,” Office of Governor Gavin Newsom, May 21, 2026. <https://www.gov.ca.gov/2026/05/21/governor-newsom-expands-access-to-life-saving-calheatscore-a-cutting-edge-tool-to-keep-californians-safe-during-extreme-heat/>

⁷ Southern California Edison Advice Letter No. 5707-E et al., Attachment D, p. 24 (Slide “Desired Outcomes”: “*Option 1 is an interim solution proposed for immediate implementation until CalHeatScore is available.”)

“region-specific thresholds” and be implemented by May 2026.⁸ While that deadline has come and gone, it is clear that the Commission intended for the IOUs to implement protections based on regional variation in extreme heat risk in the near-term. Yet, the Draft Resolution does not establish a timeline for implementation of region-specific protections (the full proposal utilizing the CHS). The proposed language merely recognizes that the IOUs will need time to integrate the CHS API into their billing systems.⁹ The IOUs each estimate that it will take four to six months to implement a CHS-based system for halting disconnections, once the CHS data is available.¹⁰

Here, the Commission omits an important fact. On May 21, 2026, the CHS API was released.¹¹ In its announcement of the new API, the California Environmental Protection Agency specifically noted that the data release would enable the IOUs to implement power shutoff protections using the CHS tool.¹² Thus, the discussion section and findings of the Draft Resolution should be modified to reflect this update. Given that the IOUs have reported their ability to establish the new protections within six months of the API availability, the first ordering paragraph should also be modified to direct the IOUs to implement the CHS Level 2 threshold “no later than six months after issuance of the resolution.”

Fourth, the Commission should instruct the IOUs to include a summary of CHS implementation costs in their first Tier 1 Advice Letter compliance filing. As raised in TURN’s protest to the Joint AL and acknowledged by the Draft Resolution, the IOUs have not provided any estimates of set-up costs to date.¹³ Nevertheless, the Draft Resolution permits the IOUs to

⁸ D.25-06-012, p. 35.

⁹ Draft Resolution, p. 9.

¹⁰ Draft Resolution, p. 8.

¹¹ “State Launches a New Feature to CalHeatScore to Make Extreme Heat Info Accessible to More Californians,” California Environmental Protection Agency, May 21, 2026. <https://oehha.ca.gov/press-release/state-launches-new-feature-calheatscore-make-extreme-heat-info-accessible-more-californians>

¹² *Id.* The new API can be accessed at: “CalHeatScore API Documentation,” California Environmental Protection Agency, accessed June 24, 2026. <https://calheatscore.calepa.ca.gov/api/>

¹³ Draft Resolution, pp. 6-7.

record the incremental costs of implementation to their disconnection memorandum accounts.¹⁴

It also instructs the IOUs to file an annual Tier 1 Advice Letter reporting on the arrearage impacts of the CHS Level 2 trigger.¹⁵ Given the lack of cost details, the importance of transparency, and the relevance of costs to future decision making, the Commission should modify the Resolution's fourth ordering paragraph to require that the IOUs, in their first Tier 1 Advice letter, report the costs of setting up the CHS-based protections system.

III. CONCLUSION

With these modest revisions, the Joint Consumer Advocates urge the adoption of the Draft Resolution, which will enhance critical residential customer protections from disconnections during periods of extreme heat.

Respectfully submitted on behalf of
TURN, CforAT, NCLC, and UCAN,

By: _____/s/_____
Sylvie Ashford
Energy & Climate Policy Analyst

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Date: June 29, 2026

¹⁴ Draft Resolution, p. 12.

¹⁵ Id.