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

Order Instituting Rulemaking on
Customer-Generated Renewables for
Priority Communities.

Rulemaking 25-01-005
(Filed January 16, 2025)

**OPENING COMMENTS OF PACIFIC GAS AND ELECTRIC
COMPANY (U 39 E) TO THE PROPOSED DECISION MODIFYING THE
DISADVANTAGED COMMUNITIES—SINGLE-FAMILY SOLAR HOMES
PROGRAM**

ASHLEY E. MERLO

Pacific Gas and Electric Company
Law Department, 19th Floor
300 Lakeside Drive, Suite 210
Oakland, CA 94612
Telephone: (925) 200-5819
Facsimile: (510) 898-9696
E-Mail: Ashley.Merlo@pge.com

Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: September 24, 2026

SUBJECT INDEX OF RECOMMENDED CHANGES

Pursuant to Rule 14.3(b) of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, Pacific Gas and Electric Company ("PG&E") provides this Subject Index of Recommended Changes in support of its Opening Comments on the Proposed Decision Modifying the Disadvantaged Communities—Single-Family Solar Homes ("DAC-SASH") program.

PG&E recommends only one modest clarification to the PD's discussion of program funding allocation. Specifically, to align the PD with D.18-06-027 and D.20-12-003, PG&E recommends revising the language at page 4 of the PD as follows:

The program budget is allocated ~~to GRID~~ as follows: 10% for administration; 4% for marketing and outreach; 1% for program evaluation; and 85% for incentives. ~~Currently, program funding is not allocated to the IOUs.~~

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I. INTRODUCTION

Pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure, Pacific Gas and Electric Company (“PG&E”) provides these Opening Comments to the Proposed Decision Modifying the Disadvantaged Communities—Single-Family Solar Homes (“DAC-SASH”) Program (“PD”). PG&E supports the Commission’s proposed modifications to the DAC-SASH program, however, PG&E recommends one modest clarification to the PD’s discussion of program funding allocation.

II. RECOMMENDED CLARIFICATION REGARDING PROGRAM FUNDING ALLOCATION

The PD’s discussion at page 4 is imprecise in its language concerning allocation of the program budget “*to* Grid” (emphasis added), and statement that “program funding is not allocated to the IOUs.” D.18-06-027 does not expressly allocate the program budget *to* the Program Administrator (Grid). Rather, D.18-06-027 directs that “the PA shall ensure that funding is allocated as follows across program functions,” with the allocations reflected in the PD.¹

In addition, the PD acknowledges on page 5 that D.20-12-003 “allowed the large IOUs to be reimbursed for program administration costs.” Specifically, Ordering Paragraph 7 of D.20-12-003 authorized the IOUs “to seek recovery of their approved administration costs *through their*

¹ D.18-06-027, Appendix A at A-6.

respective Disadvantaged Communities - Single Family Solar Homes balancing accounts...”

(emphasis added). Accordingly, it is not accurate to suggest that all program funds are allocated to Grid.

To align the PD with D.18-06-027 and D.20-12-003, PG&E recommends revising the language at page 4 of the PD as follows:

The program budget is allocated ~~to GRID~~ as follows: 10% for administration; 4% for marketing and outreach; 1% for program evaluation; and 85% for incentives. **Currently, program funding is not allocated to the IOUs.**

III. CONCLUSION

PG&E appreciates the opportunity to provide these opening comments and encourages the Commission to adopt the proposed modifications described above.

Respectfully Submitted,

ASHLEY E. MERLO

By: /s/ Ashley E. Merlo
ASHLEY E. MERLO

Pacific Gas and Electric Company
Law Department, 19th Floor
300 Lakeside Drive, Suite 210
Oakland, CA 94612
Telephone: (925) 200-5819
Facsimile: (510) 898-9696
E-Mail: Ashley.Merlo@pge.com

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