



Decision _____

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

09/18/26

04:59 PM

A2609016Application 26-09-XXX
(Filed September 18, 2026)Application of Center for Accessible
Technology Requesting Intervenor
Compensation for Substantial Contribution to
Resolution E-5468**INTERVENOR COMPENSATION CLAIM OF CENTER FOR ACCESSIBLE
TECHNOLOGY**

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 lcompcoordinator@cpuc.ca.gov.

Intervenor: CENTER FOR ACCESSIBLE TECHNOLOGY (CforAT)		For contribution to Resolution E-5468 (copy attached)¹	
Claimed: \$ 22,790.00		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/ <i>Melissa W. Kasnitz</i>	
Date: September 18, 2026	Submitted by:	Melissa W. Kasnitz	

PART I: PROCEDURAL ISSUES
(to be completed by Intervenor except where indicated)

A. Brief description of Decision:	Resolution E-5468 (the Final Resolution) approved with modifications a Joint IOU Tier 3 Advice Letter submitted by the large energy IOUs to adjust the temperature thresholds that halt disconnections, pursuant to D.25-06-012. That
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¹ Resolution E-5468 was authorized through D. 25-06-012, a Decision issued in R.18-07-005. CforAT is filing a motion seeking to consolidate this compensation application with the open rulemaking docket.

	Decision required the submission of a Tier 3 Advice Letter detailing the IOUs' plans and timeline. The Commission determined that the Joint IOU Tier 3 Advice Letter did not offer sufficient health protections for ratepayers and agreed with consumer advocates that a 90-degree trigger threshold should be adopted. The Commission further directed the IOUs to adopt a Level 2 threshold using the CalHeatScore (CHS) tool, instead of their proposed Level 3 threshold which the Commission determined is not lower than the existing 100-degree trigger threshold and therefore not compliant with D.25-06-012. In the Final Resolution, the Commission also established an annual Tier 1 Advice Letter reporting requirement for the Joint IOUs to track the impact results of the CHS Level 2 trigger threshold on arrearages for three years.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812²:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	N/A	
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	See comment 1 below	
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:	See comments 2-3 below	
6. Date of ALJ ruling:	See comments 2-3 below	
7. Has the Intervenor demonstrated customer status or eligible government entity status?		
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
8. Based on ALJ ruling issued in proceeding number:	See comments 2-3 below	

² All statutory references are to California Public Utilities Code unless indicated otherwise.

	Intervenor	CPUC Verification
9. Date of ALJ ruling:	See comments 2-3 below	
10. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
11. Identify Final Decision:	Res. E-5468	
12. Date of issuance of Final Order or Decision:	July 20, 2026	
13. File date of compensation request:	September 18, 2026	
14. Was the request for compensation timely?		

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

#	Intervenor's Comment(s)	CPUC Discussion
1	In D.98-11-049, the Commission determined that an NOI incorporated in a timely-filed Request for Compensation for work on an advice letter is itself timely filed. CforAT has attached to this compensation request our NOI for this proceeding. The approach CforAT is following here is consistent with the instructions in the CPUC's Intervenor Compensation Program Guide (Revised 4/17) at p. 27.	
2	CforAT has previously been found to be eligible for compensation and has been awarded compensation in the R.18-07-005 proceeding, which directed the collaborative process among the IOUs and parties to develop a proposal for extreme heat protections and required a Tier 3 Advice Letter and associated resolution process for approval of extreme heat protections. <i>See</i> D.21-07-025, D.23-06-052, D.24-10-028, and D.26-09-030. "A party found eligible for an award of	

#	Intervenor's Comment(s)	CPUC Discussion
	compensation in one phase of a proceeding remains eligible in later phases, including any rehearing, in the same proceeding." CPUC Rules of Practice and Procedure, Rule 17.2.	
3	CforAT has routinely been found to be an eligible customer and has routinely had our showings of financial hardship accepted by the Commission. Our last formal Ruling establishing our eligibility for intervenor compensation was issued on June 3, 2026 in R.25-04-010.	

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
Overview: CforAT's work leading up to the Final Resolution has focused on ensuring that the IOUs timely adopt adequate protections to halt disconnections for nonpayment during periods of extreme heat. These protections are critical to protecting the health and safety of ratepayers, particularly for vulnerable customers such as CforAT's constituency of customers with disabilities and medical needs. CforAT's work on this issue, all of which took place	The Final Resolution takes actions that are consistent with the recommendations made by CforAT. CforAT's direct contributions are set forth in detail below.	

following the issuance of D.25-06-012 in R.18-07-005, has included participation in a working group process to review and provide feedback on parties' proposals for extreme heat protections and participation in an ex parte meeting with Commissioner Houck's office. CforAT has previously requested and been awarded compensation for our substantial contributions to D.25-06-012 (<i>see</i> D.26-09-030), but we have not previously requested compensation for any of the work described here, including work on the following filings and submissions in the Advice Letter/Resolution process: Protest to Joint IOU Extreme Heat Advice Letter (Protest), submitted jointly with NCLC on January 6, 2026. Emergency Motion to Modify Weather-Related Disconnection Protections to Better Address Extreme Heat Health and Safety Risks (Emergency Motion), filed jointly with TURN, NCLC, and UCAN on May 28, 2026 in the main docket, R.18-07-005, addressing issues of service disconnection. Motion to Shorten Time to Respond to the Emergency Motion on Extreme Heat (Motion to Shorten Time), filed jointly with TURN,		
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NCLC, and UCAN on May 28, 2026 in R.18-07-005. Comments on Draft Resolution, submitted jointly with TURN, NCLC, and UCAN on June 29, 2026.		
Working Group: CforAT participated in a Working Group coordinated by the IOUs based on direction from the Commission and including multiple parties working to review and provide feedback on the proposals to adjust temperature thresholds that trigger disconnection suspensions. CforAT was an active participant and requested an additional Working Group meeting to better address parties' feedback and questions and make further efforts towards a consensus proposal in compliance with D.25-06-012's instruction for a collaborative process. Parties agreed to this request and an additional meeting garnered additional information and discussion important to shaping proposals. As part of the Working Group process, CforAT provided Feedback on Extreme Heat Proposals jointly with NCLC, which was submitted to the Commission as an attachment to the Joint IOU Advice Letter. In this feedback, CforAT objected to the IOUs' proposal of a 98 degrees threshold and argued that temperature threshold for suspending	Consistent with the input and feedback provided by CforAT, the Final Resolution adopts an interim and fallback temperature threshold of 90 degrees to halt disconnections to provide meaningful immediate protections. Final Resolution at pp. 10-11. CforAT's direct input in the working group process was provided in conjunction with the Joint Advice Letter submitted by the IOUs.	

disconnections should not exceed 95 degrees and noted that even this threshold may pose heat risk for some individuals, including people with disabilities and medical needs. CforAT also noted the need for an interim measure by the May 1, 2026 deadline and recommended that the IOUs adopt an interim temperature threshold at 95 degrees or lower to meet this deadline and expand heat protections in the near term.		
Protest: Following the Joint IOUs' submission of their Tier 3 Advice Letter, CforAT (in conjunction with NCLC) submitted a timely protest. The Protest identified the Joint IOU Advice Letter's failure to adopt any form of interim protection for Californians while waiting to implement the CalHeatScore proposal. CforAT argued the importance of establishing an interim protection measure by increasing the temperature threshold for halting disconnections, and that this interim threshold should be set at 90 degrees Fahrenheit until the CalHeatScore system is available. CforAT also advocated for additional analysis to be conducted to determine the appropriate protection level to set in the long term.	Consistent with CforAT's recommendations, the Commission agreed with the Protest and adopted 90 degrees as an immediate interim trigger threshold until CalHeatScore is available and able to be implemented within the IOUs systems. The Commission also agreed with CforAT that the single statewide interim and fallback temperature should be set at 90 degrees in order to protect residents across varied regions. Consistent with CforAT's recommendations, the Commission also directed additional data to be tracked by the IOUs in order for the Commission to determine whether to continue the requirement and concurred that additional data and analysis is reasonable after the issuance of the Final Resolution. Final Resolution at pp. 10-11, 13, 17.	

Protest at pp. 1-3, cited in Final Resolution at pp. 7, 17.		
Emergency Motion and Motion to Shorten Time: CforAT and other advocates filed an Emergency Motion that requested the Commission to direct the IOUs to lower the statewide temperature threshold for suspending disconnections from 100°F to 90°F immediately upon issuance of a Commission ruling. The Emergency Motion called for immediate Commission Action in order to meaningfully expand protections and emphasized the urgent need for enhanced extreme heat protections in summer 2026, while also noting the Commission’s stated intent to have protections in place by May 1, 2026. Emergency Motion at pp. 1-8, cited in Final Resolution at pp. 4-5, 16. The Motion to Shorten Time requested that the Commission shorten the time for responding to the Emergency Motion from the standard 15-day period to 5 business days in order to quickly facilitate a Commission decision to improve protections for customers in periods of extreme heat. The Motion to Shorten Time argued that a shortened response period is appropriate given the missed deadline of implementing extreme heat protections before May 1, 2026 and the need to address protections with the	Consistent with the Emergency Motion’s request for immediate Commission action, the Draft Resolution E-5468 was issued on June 22, 2026, shortly following the submission of the Emergency Motion and Responses; the Final Resolution was issued on July 20, 2026. Consistent with the Emergency Motion’s request for interim protections halting disconnections when temperatures exceed 90°F, the Final Resolution directs the IOUs to immediately adopt an interim fallback trigger threshold of 90 degrees Fahrenheit to halt disconnections during extreme heat. Final Resolution at pp. 17-18. In a June 3, 2026 Email Ruling, ALJ Dugowson partially granted the Motion to Shorten Time. Consistent with the Motion to Shorten Time’s arguments that shortened time is appropriate to facilitate implementation of protections by summer, the Email Ruling adopted an expedited deadline for response of June 10, 2026 and acknowledged “the goal of implementing protections for the summer period.” Email Ruling Partially Granting Motion for Expedited Comment Period, issued June 3, 2026, at p. 4.	

onset of summer. The Motion to Shorten Time argued that a shortened response time would not prejudice any parties as they have already provided extensive comments on these issues. Motion to Shorten Time at pp. 1-3.		
Comments on Draft Resolution: The Draft Resolution issued in response to the Joint Advice Letter established meaningful extreme heat protections, and CforAT generally supported its adoption. In comments, CforAT requested that the Commission revise and clarify the Draft Resolution to: (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 adoption of the resolution; (3) direct the IOUs to implement the CHS Level 2 protections within six months of resolution’s adoption, in light of the fact that the CHS application programming interface (API) was released on May 21, 2026; and (4) instruct the IOUs to include a summary of CHS implementation costs in their first Tier 1 AL compliance filing.	The Commission “concur[red] with these proposed changes and . . . incorporated them into the Final Resolution.” Final Resolution at pp. 15; pp. 4-5, 16 (acknowledging Emergency Motion); p. 18 (ordering that threshold of 90 degrees Fahrenheit shall be effective immediately upon adoption of Final Resolution); pp. 12, 16 (directing IOUs to implement CHS Level 2 protections within six months of adoption of Final Resolution); p. 18 (instructing IOUs to include summary of CHS implementation costs in their first Tier 1 AL compliance filing).	

Comments on Draft Resolution at pp. 2-5, cited in Final Resolution at pp. 14-15.		
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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: CforAT shared positions on the extreme heat issue with TURN, Cal Advocates, UCAN, and NCLC.		
d. Intervenor's claim of non-duplication: CforAT provided unique contributions in this proceeding based on our specific focus on the needs of our constituency of utility customers with disabilities and medical needs, and particularly on the need for the utilities' to adopt immediate meaningful disconnection thresholds to protect vulnerable customers during extreme heat. We also coordinated appropriately with the other consumer advocates to avoid duplication. These efforts included joint filings with NCLC and with TURN, NCLC, and UCAN, respectively. To the extent that parties shared positions, this consensus among advocates arose from the importance of the issues under consideration, meaningfully influenced the Commission's modifications to the Joint IOUs' Extreme Heat Proposal, and should not be a basis for a reduction in compensation.		

C. Additional Comments on Part II: (use line reference # or letter as appropriate)

#	Intervenor's Comment	CPUC Discussion
	CforAT acknowledges that work on the Resolution is intertwined to some degree with work in the overarching Disconnections Docket, R.18-07-005. CforAT is filing this separate application based on our understanding of	

#	Intervenor's Comment	CPUC Discussion
	recent developments in the way that the Commission considers the availability of compensation for work on Commission Resolutions. In order to most efficiently facilitate a resolution of this claim, we are also submitting a request for consolidation of this new application with the open docket.	

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: CforAT's overall cost of participation in work advancing the timely adoption of Resolution E-5468 is reasonable. The efforts culminating in the Final Resolution were focused on ensuring that the utilities established meaningful new disconnection safeguards during extreme heat, and that interim safeguards were in place during the summer of 2026. These protections are of particular importance to our constituency of residential utility customers with disabilities and medical needs, who depend on access to reliable and affordable energy for their health and safety needs and who are especially vulnerable during extreme heat events. While it is difficult to assign a monetary value to CforAT's contributions, CforAT's efforts to ensure adequate disconnection protections during extreme heat provided a substantial benefit to this population.	
b. Reasonableness of hours claimed: All work on this proceeding was led and supervised by CforAT's Legal Director, Melissa W. Kasnitz. Ms. Kasnitz has substantial experience addressing energy utility matters before the Commission and considering the impacts to CforAT's constituency of residential utility customers with disabilities and medical needs. Certain tasks were delegated to CforAT's Staff Attorney, Rachel Sweetnam, who bills at a substantially lower rate. While a junior attorney may be less efficient in performing various tasks than a more experienced attorney, this form of delegation with appropriate supervision achieves reasonable overall efficiency and cost. Time spent delegating and overseeing work is efficient and necessary and still results	

	CPUC Discussion
in lower overall cost than would be the case without such delegation of responsibility.	
c. Allocation of hours by issue: In this request, CforAT is solely requesting compensation for time spent on the Extreme Heat issue addressed in the Final Resolution, and we are not including any time already requested and compensated for work prior to the adoption of D.25-06-012. In our attached timesheets, the extreme heat issue is identified as “XH.” In our prior compensation request in the R.18-07-005 proceeding, CforAT specifically reserved the right to seek compensation for additional work following the issuance of D.25-06-012 at a later date. CforAT Request for Intervenor Compensation for Contribution to D.24-11-005 and D.25-06-012, filed August 18, 2025, at p. 2. Kasnitz -2025 Hours Extreme Heat: 10.9 Hours (100%) Kasnitz -2026 Hours Extreme Heat: 14.8 Hours (100%) Sweetnam -2025 Hours Extreme Heat: 6.9 Hours (100%) Sweetnam -2026 Hours Extreme Heat: 1.0 Hours (100%)	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Melissa W. Kasnitz	2025	10.9	\$ 755	D.25-10-060	\$ 8,229.50			

CLAIMED						CPUC AWARD		
Melissa W. Kasnitz	2026	14.8	\$ 780	D.26-07-022	\$ 11,544.00			
Rachel Sweetnam	2025	6.9	\$ 275	D.25-10-050	\$ 1,897.50			
Rachel Sweetnam	2026	1.0	\$ 300	Requested in R.22-04-003 compensation claim, filed September 9, 2026	\$ 300.00			
Subtotal: \$ 21,971.00						Subtotal: \$		
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 \$
Subtotal: \$						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Rachel Sweetnam	2026	10.6	\$ 150	½ 2026 requested rate	\$ 1,590.00			
Melissa W. Kasnitz	2026	2.1	\$ 390	½ rate from D.26-07-022	\$ 819.00			
Subtotal: \$ 2,409.00						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
1.								
2.								
Subtotal: \$						Subtotal: \$		
TOTAL REQUEST: \$ 22,790.00						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			CPUC AWARD
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			
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ³	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Melissa W. Kasnitz	1992	162679	No
Rachel Sweetnam	2023	350075	No

C. Attachments Documenting Specific Claim and Comments on Part III⁴:
(Intervenor completes)

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Time Records
3	Notice of Intent
4	Resolution E-5468

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
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³ This information may be obtained through the State Bar of California's website at <https://apps.calbar.ca.gov/attorney/LicenseeSearch/QuickSearch>.

⁴ Attachments not attached to final Decision

B. Comment Period: Was the 30-day comment period waived (see 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. **CENTER FOR ACCESSIBLE TECHNOLOGY** [has/has not] made a substantial contribution to Resolution Res. E-5468.
2. The requested hourly rates for **CENTER FOR ACCESSIBLE TECHNOLOGY**'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. **CENTER FOR ACCESSIBLE TECHNOLOGY** is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay **CENTER FOR ACCESSIBLE TECHNOLOGY** the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **CENTER FOR ACCESSIBLE TECHNOLOGY** 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 **CENTER FOR ACCESSIBLE TECHNOLOGY**’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):	Resolution. E-5468		
Proceeding(s):	Application 26-09-XXX		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
CENTER FOR ACCESSIBLE TECHNOLOGY	September 18, 2026	\$ 22,790.00		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Melissa	Kasnitz	Attorney	\$ 755	2025	
Melissa	Kasnitz	Attorney	\$ 780	2026	
Rachel	Sweetnam	Attorney	\$ 275	2025	
Rachel	Sweetnam	Attorney	\$ 300	2026	

(END OF APPENDIX)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Center for Accessible Technology
Requesting Intervenor Compensation for Significant
Contribution to Resolution E-5468

Application 26-09-XXX
(Filed September 18, 2026)

**NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION
AND, IF REQUESTED (and []⁵ checked), ADMINISTRATIVE LAW JUDGE'S
RULING ON [CENTER FOR ACCESSIBLE TECHNOLOGY]'S SHOWING OF
SIGNIFICANT FINANCIAL HARDSHIP**

**NOTE: AFTER ELECTRONICALLY FILING A PDF COPY OF THIS NOTICE OF
INTENT, PLEASE EMAIL THE DOCUMENT IN AN MS WORD FORMAT TO THE
INTERVENOR COMPENSATION PROGRAM COORDINATOR AT**

lcompcoordinator@cpuc.ca.gov

**Customer or Eligible Local Government Entity (party intending to claim intervenor
compensation): CENTER FOR ACCESSIBLE TECHNOLOGY**

Assigned Commissioner: N/A

Administrative Law Judge: N/A

I hereby certify that the information I have set forth in Parts I, II, III and IV of this Notice of Intent is true to my best knowledge, information and belief.

Signature: */s/ Melissa W. Kasnitz*

Date:

Printed Name:

Melissa W. Kasnitz

PART I: PROCEDURAL ISSUES

(To be completed by the party intending to claim intervenor compensation)

A. Status as "customer" (see Pub. Util. Code § 1802(b))⁶ The party claims "customer" status because the party is (check one):	Applies (check)
1. A Category 1 customer is an actual customer whose self-interest in the proceeding arises primarily from his/her role as a customer of the utility and, at the same time, the customer must represent the broader interests of at least some other customers. See, for example, D.08-07-019 at 5-10).	☐
2. A Category 2 customer is a representative who has been authorized by actual customers to represent them. Category 2 involves a more formal arrangement where a customer or a group of customers selects a more skilled person to	☐

⁵ DO NOT CHECK THIS BOX if a finding of significant financial hardship is not needed (in cases where there is a valid rebuttable presumption of eligibility (Part III(A)(3)) or significant financial hardship showing has been deferred to the intervenor compensation claim).

⁶ All statutory references are to California Public Utilities Code unless indicated otherwise.

represent the customer's views in a proceeding. A customer or group of customers may also form or authorize a group to represent them, and the group, in turn, may authorize a representative such as an attorney to represent the group.	
3. A Category 3 customer is a formally organized group authorized, by its articles of incorporation or bylaws to represent the interests of residential customers or small commercial customers receiving bundled electric service from an electrical corporation (§1802(b)(1)(C)). Certain environmental groups that represent residential customers with concerns for the environment may also qualify as Category 3 customers, even if the above requirement is not specifically met in the articles or bylaws. <i>See</i> D.98-04-059, footnote at 30.	☒
4. The party's detailed explanation of the selected customer category. <u>The party's explanation of its status as a Category 1 customer.</u> A party seeking status as a Category 1 customer must describe the party's own interest in the proceeding and show how the customer's participation goes beyond just his/her own self-interest and will benefit other customers. Supporting documents must include a copy of the utility's bill. <u>The party's explanation of its status as a Category 2 customer.</u> A party seeking status as a Category 2 customer must identify the residential customer(s) being represented and provide authorization from at least one customer. <u>The party's explanation of its status as a Category 3 customer.</u> If the party represents residential and small commercial customers receiving bundled electric service from an electrical corporation, it must include in the Notice of Intent either the percentage of group members that are residential ratepayers or the percentage of the members who are receiving bundled electric service from an electrical corporation. Supporting documentation for this customer category must include current copies of the articles of incorporation or bylaws. If current copies of the articles and bylaws have already been filed with the Commission, only a specific reference (the proceeding's docket number and the date of filing) to such filings needs to be made. Center for Accessible Technology (CforAT) is an organization that is authorized by its bylaws to represent the interests of residential customers with disabilities before the Commission; specifically, our bylaws state at Article 2.1(d) that CforAT is "involved in advocacy initiatives to enhance the lives of the disability community, including ways to improve access to technology and increase the ability of people with disabilities to live independently. In particular, CforAT is authorized and urged to actively participate and intervene before government entities, including but not limited to the California Public Utilities Commission, on all matters that it deems appropriate that will affect directly or indirectly the interests of residential customers with disabilities, ratepayers with disabilities, small businesses owned by people with disabilities, including customers who receive bundled electric service from an electrical corporation." CforAT is not a membership organization.	

A copy of CforAT's bylaws were submitted with our NOI in A.10-03-014, which was filed on August 29, 2011. No relevant changes have been made since that time. An additional copy can be provided upon request.	
Do you have any direct economic interest in outcomes of the proceeding? ⁷ If "Yes", explain:	☐ Yes ☒ No
B. Conflict of Interest (§ 1802.3)	Check
1. Is the customer a representative of a group representing the interests of small commercial customers who receive bundled electric service from an electrical corporation?	☒ Yes ☐ No
2. If the answer to the above question is "Yes", does the customer have a conflict arising from prior representation before the Commission?	☐ Yes ☒ No
C. Status as an Eligible Local Government Entity (§§1802(d), 1802.4, 1803.1)	
The party claims "eligible local government entity" status because the party is a city, county, or city and county that is not a publicly owned public utility that intervenes or participates in a Commission proceeding for the purpose of protecting the health and safety of the residents within the entity's jurisdiction following a catastrophic material loss suffered by its residents either in significant damage to infrastructure or loss of life and property, or both, as a direct result of public utility infrastructure.	☐ Yes ☒ No
The party's explanation of its status as an eligible local government entity must include a description of (1) The relevant triggering catastrophic event; (2) The impacts of the triggering catastrophic event on the residents within the entity's jurisdiction as a result of public utility infrastructure; and (3) The entity's reason(s) to participate in this proceeding.	
D. Timely Filing of Notice of Intent to Claim Intervenor Compensation (NOI) (§ 1804(a)(1)):	
1. Is the party's NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: Click here to enter a date.	☐ Yes ☒ No
2. Is the party's NOI filed at another time (for example, because no Prehearing Conference was held, the proceeding will take less than 30 days, the schedule did not reasonably allow parties to identify issues within the timeframe normally permitted, or new issues have emerged)?	☒ Yes ☐ No
2a. The party's description of the reasons for filing its NOI at this other time: Because the adoption of Res. E-5468 took place outside of a formal proceeding, there was no prehearing conference. In accordance with the instructions in the Commission's Intervenor Compensation Program Guide (Revised 4/17), CforAT is submitting this NOI in conjunction with its compensation request. This guidance also states that "information on	

⁷ See Rule 17.1(f).

planned participation and expected budget is not required” in an NOI addressing a claim for compensation on a resolution that has already been issued. Intervenor Compensation Program Guide at p. 25.

2b. The party’s information on the proceeding number, date, and decision number for any Commission decision, Commissioner ruling, Administrative Law Judge’s ruling, or other document authorizing the filing of NOI at that other time:

PART II: SCOPE OF ANTICIPATED PARTICIPATION
(To be completed by the party intending to claim intervenor compensation)

A. Planned Participation (§ 1804(a)(2)(A)):

The party’s statement of the issues on which it plans to participate:

N/A (per guidance in the Intervenor Compensation Program Guide)

The party’s explanation of how it plans to avoid duplication of effort with other parties:

The party’s description of the nature and extent of the party’s planned participation in this proceeding (to the extent that it is possible to describe on the date this NOI is filed).

B. The party’s itemized estimate of the compensation that the party expects to request, based on the anticipated duration of the proceeding (§ 1804(a)(2)(A)):

Item	Hours	Rate \$	Total \$	#
ATTORNEY, EXPERT, AND ADVOCATE FEES				
Melissa W. Kasnitz				
Rachel Sweetnam				
[Expert 1]				
[Expert 2]				
[Advocate 1]				
[Advocate 2]				
<i>Subtotal: \$</i>				
OTHER FEES				
[Person 1]				
[Person 2]				
<i>Subtotal: \$</i>				
COSTS				
[Item 1]				
[Item 2]				
<i>Subtotal: \$</i>				
TOTAL ESTIMATE: \$				

Estimated Budget by Issues:

N/A (per guidance in the Intervenor Compensation Program Guide)

When entering items, type over bracketed text; add additional rows to table as necessary. Estimate may (but does not need to) include estimated Claim preparation time. Claim preparation time is typically compensated at ½ professional hourly rate.

PART III: SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP
(To be completed by party intending to claim intervenor compensation;
see Instructions for options for providing this information)

A. The party claims that participation or intervention in this proceeding without an award of fees or costs imposes a significant financial hardship, on the following basis:	Applies (check)
1. The customer cannot afford, without undue hardship, to pay the costs of effective participation, including advocate's fees, expert witness fees, and other reasonable costs of participation. (§ 1802(h))	☐
2. In the case of a group or organization, the economic interest of the Individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding. (§ 1802(h))	☐
3. The eligible local government entities' participation or intervention without an award of fees or costs imposes a significant financial hardship. (§ 1803.1(b).)	☐
4. A § 1802(h) or § 1803.1(b) finding of significant financial hardship in another proceeding, made within one year prior to the commencement of this proceeding, created a rebuttable presumption in this proceeding (§ 1804(b)(1)).	☐
Commission's finding of significant financial hardship made in proceeding number:	
Date of Administrative Law Judge's Ruling (or CPUC Decision) in which the finding of significant financial hardship was made:	
B. The party's explanation of the factual basis for its claim of "significant financial hardship" (§ 1802(h) or § 1803.1(b)) (necessary documentation, if warranted, is attached to the NOI:	

**PART IV: ATTACHMENTS DOCUMENTING SPECIFIC
 ASSERTIONS MADE IN THIS NOTICE**

**(The party intending to claim intervenor compensation identifies and attaches documents;
 add rows as necessary)**

Attachment No.	Description
1	Certificate of Service

ADMINISTRATIVE LAW JUDGE RULING⁸**(Administrative Law Judge completes)**

	Check all that apply
1. The Notice of Intent (NOI) is rejected for the following reasons:	☐
a. The NOI has not demonstrated the party's status as a "customer" or an "eligible local government entity" for the following reason(s):	☐
b. The NOI has not demonstrated that the NOI was timely filed (Part I(B)) for the following reason(s):	☐
c. The NOI has not adequately described the scope of anticipated participation (Part II, above) for the following reason(s):	☐
2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above).	☐
3. The NOI has not demonstrated significant financial hardship for the following reason(s):	☐
4. The Administrative Law Judge provides the following additional guidance (see § 1804(b)(2)):	☐

IT IS RULED that:

1. The Notice of Intent is rejected.	☐
2. The customer or eligible local government entity has satisfied the eligibility requirements of Pub. Util. Code § 1804(a).	☐
3. The customer or eligible local government entity has shown significant financial hardship.	☐
4. The customer or eligible local government entity is preliminarily determined to be eligible for intervenor compensation in this proceeding. However, a finding of significant financial hardship in no way ensures compensation.	☐
5. Additional guidance is provided to the customer or eligible local government entity as set forth above.	☐

Dated _____, at San Francisco, California.

Administrative Law Judge

⁸ A Ruling needs not be issued unless: (a) the NOI is deficient; (b) the Administrative Law Judge desires to address specific issues raised by the NOI (to point out similar positions, areas of potential duplication in showings, unrealistic expectations for compensation, or other matters that may affect the customer or eligible local government entity's Intervenor Compensation Claim); or (c) the NOI has included a claim of "significant financial hardship" that requires a finding under § 1802(h).

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

RESOLUTION E-5468

July 16, 2026

R E S O L U T I O N

Resolution E-5468. Approve with modifications the joint Tier 3 Advice Letter of Southern California Edison Company (AL 5707-E), Pacific Gas and Electric Company (AL 7783-E), San Diego Gas and Electric Company (AL 4770-E), and Southern California Gas Company (AL 6570-G)

PROPOSED OUTCOME:

- Approve with modifications the joint Tier 3 Advice Letter of Southern California Edison Company (SCE) (AL 5707-E), Pacific Gas and Electric Company (PG&E) (AL 7783-E), San Diego Gas and Electric Company (SDG&E) (AL 4770-E), and Southern California Gas Company (SoCalGas) (AL 6570-G)

SAFETY CONSIDERATIONS:

- There are no safety considerations associated with this resolution.

ESTIMATED COST:

- This Resolution is expected to lead to minimal increased costs in the Disconnections Memorandum Account.

By Advice Letter 5707-E, 4770-E, 7783-E, and 6570-G, filed on
December 17, 2025

SUMMARY

This Resolution approves 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) (together, the Joint IOUs) to adjust the temperature thresholds that halt disconnections, pursuant to Decision (D.) 25-06-012, which required the submission of a Tier 3 Advice Letter (AL) detailing their plans and timeline.

BACKGROUND

In Phase I of the Disconnections 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 100° Fahrenheit (F) or below 32°F are forecast within a 72-hour look-ahead period.¹ This rule made permanent an interim moratorium on disconnections during extreme weather from D.18-12-013, reflecting the Commission's recognition that loss of power during temperature extremes poses serious public health risks. Moreover, the Commission permitted the Joint IOUs to continue using their own internal weather monitoring systems to meet the requirement.

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."² The Amended Scoping Memo formally added The Utility Reform Network's (TURN's) extreme heat issues to Phase 2 and set forth a process to develop the record. Amidst multiple heat waves in August 2024, TURN filed an Emergency Motion in R.18-07-005, urging the Commission to strengthen disconnection protections during extreme heat events.³ 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.

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 acknowledged that additional disconnection safeguards are needed for extreme heat events and directs utilities to develop those measures in coordination with interested parties. Ordering Paragraph (OP) 4 of D.25-06-012 required the Joint IOUs to submit a Tier 3 AL within six months of the Decision proposing adjusted "heat-triggered" disconnection thresholds.

¹ D.20-06-003 at OP 1.

² Amended Scoping Memo at 4.

³ TURN's Emergency Motion To Modify Weather-Related Disconnection Protections to Better Address "Extreme Heat" Health and Safety Risks, filed August 14, 2024.

On behalf of SCE, PG&E, and SDG&E (together, the Electric IOUs), and SoCalGas, SCE has submitted this Tier 3 AL to propose an approach for adjusting the temperature thresholds that require halting disconnections, taking into account relative heat risks.

The Joint IOUs propose halting disconnections when the 72-hour forecast CalHeatScore index reaches level 3 or higher, designating a “high” impact level.

CalHeatScore (CHS) 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.⁴

CHS is a metric that quantifies relative heat exposure across different regions, allowing for the establishment of region-specific thresholds for disconnection suspensions. CHS offers a simple, easily implementable index that summarizes heat risk for each California zip code into a single measure. CHS incorporates maximum apparent temperature, commonly known as heat index. This measure “quantifies how current temperature conditions feel to the human body”⁵ which are a function of both air temperature and humidity.

CHS uses the NOAA NWS definition of apparent temperature.⁶ On the health data side, CHS 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 CHS 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.

⁴ See CalHeatScore Methods Documentation, available at <https://calheatscore.calepa.ca.gov/sites/default/files/2025-02/methods02032025.pdf>.

⁵ Id., p. 2.

⁶ Id., p. 3.

CHS documentation provides a figure of a sample zip code showing that CHS Level 1 equates to an apparent temperature between 85 to 94 degrees, Level 2 equates to an apparent temperature range of approximately 94 to about 98 degrees,⁷ Level 3 equates to an apparent temperature range of approximately 98 to 101 degrees for the same zip code.⁸ CHS Level 4 is equivalent to an apparent temperature of over 102 degrees.⁹ As defined by heat-related emergency room visits, CHS Level 1 reflects a 0 to 33 percent increase, while CHS Level 2 reflects a 33 to 66 percent increase, CHS Level 3 reflects a 67 to 100 percent, and CHS Level 4 reflects a 200 percent increase relative to heat-related emergency room visits relative to baseline conditions.¹⁰

The Joint IOUs argue that Level 3 on the CHS scale is the appropriate trigger for disconnection protections because it reflects conditions that pose a significant health risk. The 72-hour look ahead period would ensure that protections extend to adjacent days that likely register at Levels 2 or even 1, thereby providing additional coverage without lowering the threshold. They argue that 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 arrearage increases without a commensurate increase in public health benefit.

The Joint IOUs also considered the possibility that the CHS 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. For the interim period prior to the availability and adoption of CHS the Joint IOUs also plan on maintaining the 100° F trigger threshold for the interim period.

On April 20, 2026, the Joint IOUs submitted to Executive Director Leuwam Tesfai a six-month extension request to comply with D.25-06-012.¹¹

On May 28, 2026, Utility Consumer Action Network (UCAN), Californians for Accessible Technology (CforAT), National Consumer Law Center (NCLC), and TURN (the Joint Consumer Advocates) filed an Emergency Motion in R.18-07-005. The

⁷ California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, CalHeatScore Methods Documentation, p. 6, <https://calheatscore.calepa.ca.gov/sites/default/files/2025-02/methods02032025.pdf>.

⁸ *Id.*

⁹ *Id.*

¹⁰ *Id.*

¹¹ 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, at 1.

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 2026.¹² 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.¹³

NOTICE

Notice of Joint IOU Advice Letter (AL) 5707-E, 4770-E, 7783-E, and 6570-G was made by publication in the Commission's Daily Calendar. PG&E states that a copy of the AL was mailed and distributed in accordance with Section 4 of General Order 96-B to parties on the service list for R.18-07-005.

PROTESTS

The Joint IOU Advice Letter (AL) (5707-E, 4770-E, 7783-E, and 6570-G) was timely protested by the Utility Consumers' Action Network (UCAN), the Public Advocates' Office of the California Public Utilities Commission (Cal Advocates), The Utility Reform Network (TURN), and, jointly, the Center for Accessible Technology (CforAT) and National Consumer Law Center (NCLC).

UCAN protested the AL on three of the six grounds listed in GO 96-B. First, UCAN argued that the Advice Letter violates a Commission order by not changing the temperature thresholds that trigger disconnections suspensions. Secondly, the Advice Letter's "analysis, calculations, or data... contain material errors or omissions." Errors or omissions of this kind are grounds for protest. Third, the Advice Letter requests unjust and unreasonable relief by requesting disconnection suspensions at CHS Level 3, which UCAN asserted fails to protect large segments of the population, including children and the elderly.

¹² 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>

¹³ 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>

UCAN instead argued that the Commission should revise the fallback-temperature threshold, the interim-temperature threshold, and the backstop temperature threshold to 90 degrees. This aligns with the feedback that the parties supplied to the Joint IOUs in response to the Joint IOUs' proposal. Additionally, the CHS threshold should be set to Level 2 to ensure more expansive heat protections than the current 100-degree temperature threshold.

Cal Advocates protested the Joint AL on the grounds that the plan for implementation of these heat protections does not comply with the implementation date ordered in D.25-06-012 and that the proposal is unjust and unreasonable. Additionally, the CHS level at which the Joint IOUs propose to implement disconnections protections does not meet the requirements of D.25-06-012 and does not include necessary supporting analysis to justify this proposal.

Cal Advocates asserted that the Joint IOU proposal to have disconnection protections triggered at the threshold of CHS Level 3 lacks factual justification as required by D.25-06-012. Instead, Cal Advocates supports lowering the temperature threshold to 95 degrees or less as an interim measure.¹⁴

Cal Advocates argues that maintaining the maximum threshold at 100 degrees does not have an empirical basis and the IOUs have not demonstrated how this choice would reduce health-related heat risks. Cal Advocates has provided recent data and numerous peer reviewed studies on temperature and risk that show that the threshold should be lower and that 100 degrees is dangerous to human beings.¹⁵

TURN observed that the Joint IOU proposal would delay implementation of additional protections to mitigate the health impacts of extreme heat. Implementation by the Joint IOUs would not take effect until six months after the May 1, 2026 deadline established by D.25-06-012. TURN claimed that this is in violation of the Decision, which established that this proposal *must* be implemented by May 1, 2026. Instead, TURN proposed that the Commission should require the Joint IOUs to implement a lower interim temperature threshold of 90 degrees, or at most 95 degrees as a threshold disconnections suspension if the CHS approach cannot be implemented by the May 1, 2026 deadline. In addition, TURN also proposed that the Commission require the Joint

¹⁴ The California Public Advocate's Office Protest to Joint Investor-Owned Utilities (IOUs) Advice Letter to Propose Region-Specific Heat Risk Protections (Joint IOUs' Protest), at 5.

¹⁵ See Joint AL at attachment B-1 for Cal Advocates comments presenting research on temperature and heat risk.

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.¹⁶

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, UCAN, Cal Advocates, and TURN each requested data from the Joint IOUs regarding their threshold proposals.

The Joint IOUs have not presented this information in their Joint AL, nor have they provided it to the stakeholder working group members. Moreover, these parties propose that the Joint 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. The Joint IOU AL emphasizes that the proposal would be low cost to implement. As stated by SCE and echoed by SDG&E, each “[b]udget projections show minimal incremental costs”.¹⁷ 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.”¹⁸ TURN argues that, before the Joint IOUs are authorized to record incremental costs to their disconnection memorandum accounts, they should provide forecasts of such implementation costs.

CforAT and NCLC filed a joint protest. They agree with the Joint IOUs that it would be too costly and complex to set different thresholds throughout different parts of the state. Further, they propose that a single temperature cutoff should be 90 degrees in the interim until the CHS system is in place and assert that more analysis should be conducted on the appropriate protection level to set in the long term.¹⁹

REPLY TO PROTESTS

On behalf of the Joint IOUs, SCE responded to the protests of UCAN, Cal Advocates, TURN, and CforAT/NCLC on January 13, 2026.

¹⁶ 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, at 3.

¹⁷ See Joint IOUs’ Protest.

¹⁸ *Id.*

¹⁹ CforAT and NCLC Protest of SCE Advice Letter No. 5707-E; SDG&E Advice Letter No. 4770-E; Pacific Gas & Electric Company Advice Letter No. 7783-E and SoCalGas Advice Letter No. 6570-G.

The Joint IOUs maintain that CHS Level 3 is the appropriate trigger for disconnection protections because it reflects conditions that pose a significant health risk, as defined by the CHS methodology. The Joint IOUs assert that this threshold would allow for prioritization of customers most at risk from extreme heat while minimizing the cost associated with more frequent or less targeted activations. The 72-hour look-ahead period provides protections that extend to days that may register at CHS Levels 2 or 1, providing additional coverage without lowering the threshold. The Joint IOUs' historical experience with heat protections has shown that the look-ahead period tends to double the number of protected days, therefore they contend that moving the trigger to Level 2 would result in excessive activations, capturing many mild impact days that result in added costs and increases in arrears without increasing public health benefits.²⁰

The Joint IOUs acknowledge limitations in historical data to assess the impacts of the CHS thresholds. There is currently no data available for a full year, nor for any time period prior to 2025, making historical comparison difficult, as 2025 may not be an average weather year.²¹ In light of these data limitations, Joint IOUs agree with CforAT, NCLC, and TURN in their recommendation for additional analysis once more data is available.²²

In addition to the CHS level, there were also absolute temperature ceilings proposed by all protestants, which would further expand the scope of disconnection suspensions. The Joint IOUs note that California's climate is varied, which is precisely why a regionalized approach makes more sense than a flat cut-off. While the Joint IOUs agree with the protestants that a fallback maximum temperature is needed in the event that the CHS tool becomes temporarily unavailable, they disagree with the proposal to add an ongoing absolute temperature limit or ceiling to a CHS based measure, contending that this would contravene the regionalization of heat protections as required by the Decision.²³ Furthermore, Joint IOUs recommend that the Commission evaluate CHS level impacts once additional data is available and select the appropriate level of CHS

²⁰ Joint Reply to Protests of Public Advocates Office at the California Public Utilities Commission, The Utility Reform Network, Center for Accessible Technology/National Consumer Law Center, and Utility Consumers' Action Network to Southern California Edison Company's Advice 5707-E, San Diego Gas & Electric Company's Advice 4770-E, Pacific Gas and Electric Company's Advice 7783-E, and Southern California Gas Company's Advice 6570-G (Joint IOU Reply to Protests).

²¹ *Id.* at 3.

²² For instance, TURN suggested starting deployment at Level 3 and then assessing it against Level 2 further down the line.

²³ Joint IOU Reply to Protests at 4.

as a single measure of heat risk. Joint IOUs have also proposed to maintain the current approved temperature thresholds of 100°F until CHS can be implemented.

To expedite the implementation, SCE will transition to a zip code-based approach once the AL is approved. However, due to competing system enhancements and resource constraints, the implementation timeline remains 4 to 6 months. SDG&E currently uses a sub-area approach rather than specific zip codes to issue moratoriums within its system. Each sub-area is linked to the zip code GIS coordinates. SDG&E estimated that it would need approximately six months from the time the CHS API becomes available, to complete evaluation, testing, and deployment. SDG&E's budget projections reflect minimal incremental costs as SDG&E can utilize the existing sub-area and zip code GIS coordinates structure.

PG&E's current system sets maximum heat and cold temperature limits at the city level. The proposed modifications would require transitioning to CHS 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 CHS functions at the zip code level, the zip codes for each city within PG&E territory will need to be identified. PG&E estimated that it will take up to 6 months after the CHS becomes available to implement the new heat protections.

To implement the new CHS solution, the final CHS dataset is required before beginning testing and deployment. This data is expected to be available in summer 2026, which is beyond the May 1, 2026, deadline. The Joint IOUs acknowledged that their respective legacy systems and operational structures differ, hence the variations in timelines and capabilities. In response to TURN's recommendation that the Commission require the Joint IOUs to provide a forecast of implementation costs, the Joint IOUs offered to provide a cost forecast in a subsequent AL once the CHS API is available and its requirements are clear.

As for the calls to lower the minimum temperature threshold during the summer of 2026, the Joint IOUs are opposed to a full two-phase deployment and prefer implementing the CHS as the permanent solution once available. If the Commission directs an interim approach, the Joint IOUs supported a low-cost solution, such as lowering the current temperature threshold from 100°F to 95°F until CHS data is fully available and integration into legacy systems can occur.

DISCUSSION

The Commission has reviewed the Joint IOU AL and finds that it does not offer sufficient health protections for ratepayers. The Decision directed the Joint IOUs to file a Tier 3 AL to adjust the temperature thresholds that trigger disconnections suspensions within six months of the Decision's publication and to implement the proposal by May 1, 2026.²⁴

The Commission affirms that the existing 72-hour look-ahead period in advance of the appropriate temperature threshold should remain intact. However, we find that the Joint IOU proposed solution to maintain the 100-degree threshold for the interim period and as a backstop when CHS data is not available is not sufficiently low enough to ensure adequate health protections for customers during extreme heat events, as required by D.25-06-012. Moreover, we are not persuaded by the Joint IOUs' concerns regarding increased triggers and potential arrearages that could result from a lower temperature threshold.²⁵ The Decision directed the Joint IOUs to implement a proposal that would "lower the temperature or other relevant thresholds that trigger disconnections suspensions."²⁶

We agree with protestants that 90 degrees is an appropriate interim trigger threshold and direct each IOU to implement an interim trigger threshold of 90 degrees within a 72-hour lookahead period until the full CHS data is available and each IOU's system is able to implement the CHS API. Likewise, we find that this 90-degree trigger threshold is reasonable as a fallback temperature threshold in the event that the CHS system is temporarily unavailable. This 90-degree trigger threshold shall be effective immediately upon adoption of a final Resolution.

The Joint IOU proposal to retain the current threshold of 100 degrees would violate the Commission's clear direction D.25-06-012 and would conflict with the input of every non-IOU party. Further, the Commission concurs with the IOUs and CforAT/NCLC that it is reasonable to avoid the costs and complexities of setting different thresholds in different areas of the state, and instead implementing a single interim temperature cutoff until such time as the CHS system is in place.

²⁴ Decision 25-06-012 at 2.

²⁵ Joint IOU Reply to Protests at 3.

²⁶ D.25.06-012 at 38.

It stands to reason that a single threshold temperature level needs to be more protective of residents in areas of the state that are not accustomed to high temperatures, and who are at heightened risk of an extreme heat event that deviates substantially from the temperatures to which they are acclimated. Accordingly, the Commission concurs with CforAT/NCLC, UCAN, and TURN that the single statewide interim and fallback temperature threshold should be set at 90°F.²⁷ 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%).²⁸ San Francisco County defines an extreme heat event as any day when temperatures exceed 85 degrees.²⁹ Further north, Del Norte County faces extreme heat when temperatures exceed 76.8 degrees.³⁰ Within counties, local cut-offs also vary and can be significantly lower than the county-level threshold.³¹ Therefore, we adopt an interim and fallback single statewide temperature threshold of 90 degrees in order to capture these broad regional variations.

As for the adoption of CHS, the Commission directs the Joint IOUs to adopt a Level 2 threshold, as we find that CHS Level 3 is not lower than the current 100-degree trigger threshold and therefore is not in compliance with D.25-06-012.

²⁷ The IOUs propose to keep the fallback protection level for any time that the CalHeatScore tool is temporarily unavailable at 100°F statewide. Joint AL at p. 9. This proposal would completely fail to provide any of the increased protection that is the goal of the entire exercise currently underway.

²⁸ 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.

²⁹ See City and County of San Francisco, “Extreme Heat and Health” (May 17, 2023), <https://www.sf.gov/reports/may-2023/extreme-heat-and-health>.

³⁰ See Cal-Adapt, <https://cal-adapt.org/tools/extreme-heat>.

³¹ 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>.

As noted by the protestants, the Joint IOUs have failed to provide data or analysis to support the Joint IOU proposal for a CHS 3 threshold.³² CHS is a health-based metric that reflects the relationship between heat conditions and heat-related emergency department visits. CHS Level 2 equates to a 33 percent to 66 percent increase of heat-related emergency room visits compared to normal conditions.³³ By contrast, CHS Level 3 corresponds to conditions with a 67 percent to 100 percent increase above baseline levels. Accordingly, CHS Level 2 provides protections at an earlier stage of heat-related health risk.

CHS documentation also provides a figure of a sample zip code showing that CHS Level 2 equates to an apparent temperature range of about 94 to 98 degrees.³⁴ In contrast, for the same zip code, CHS Level 3 equates to an apparent temperature of about 98 to 101³⁵ degrees. The Commission previously determined that existing heat protections were insufficient.³⁶ Because a CHS Level 3 threshold would trigger protections only at a higher level of heat-related health risk and at temperatures similar to those associated with the existing protections, adopting a CHS Level 2 threshold is more consistent with the Commission's intent to expand heat protections pursuant to D.25-06-012.

On May 21, 2026, the CHS API was released.³⁷ Given that the IOUs have reported their ability to establish the new protections within six months of the API availability, the Commission directs the Joint IOUs to begin the implementation of CHS Level 2 within 6 months upon adoption of this final Resolution.

³² See Advice Letter Attachment C-2 (TURN Feedback), p. 1; Advice Letter Attachment C-3 (UCAN Feedback) p. 1. Utility Consumers' Action Network's Protest of Joint Investor-Owned Utilities (IOUs) Advice Letter to Propose Region-Specific Heat Risk Protections Pursuant to D.25-06-012, at 8. California Public Advocates Office's Protest to Joint Investor-Owned Utilities (IOUs) Advice Letter to Propose Region-Specific Heat Risk Protections at pp. 6-7.

³³ California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, CalHeatScore Methods Documentation at 8.

See: <https://calheatscore.calepa.ca.gov/sites/default/files/2025-02/methods02032025.pdf>.

³⁴ California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, CalHeatScore Methods Documentation, p. 6, <https://calheatscore.calepa.ca.gov/sites/default/files/2025-02/methods02032025.pdf>.

³⁵ California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, CalHeatScore Methods Documentation, p. 6, Figure 1:

<https://calheatscore.calepa.ca.gov/sites/default/files/2025-02/methods02032025.pdf>.

³⁶ See D.25-06-012 at 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."

³⁷ "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-newfeature-calheatscore-make-extreme-heat-info-accessible-more-californians>.

The Commission directs the Joint IOUs to track the impact results of a CHS Level 2 trigger threshold on arrearages and directs each to submit a Tier 1 Advice Letter 12 months after beginning the implementation of CHS Level 2. This reporting requirement will be an annual requirement for three years, by which time the Commission will determine whether to continue the requirement.

The Commission further finds that a CHS-based trigger is preferable to a fixed statewide temperature threshold because CHS reflects ZIP code-specific heat-health relationships and local climatological conditions. Unlike a uniform temperature trigger, CHS is designed to identify heat conditions associated with elevated health risks in different regions of California. Therefore, adopting a CHS Level 2 threshold is more consistent with the Commission's intent in D.25-06-012 to expand heat protections for residential customers.

Pursuant to D.25-06-012, Conclusion of Law 9, the Joint IOUs may record the incremental costs incurred to implement this decision to their disconnection memorandum accounts.³⁸

These provisions will not apply to SoCalGas. D.20-06-003 clearly limited the heat-triggered disconnection thresholds to electric IOUs by emphasizing that “[e]lectric energy IOUs cannot disconnect residential electricity customers when temperatures above 100 degrees or below 32 degrees are expected based on a 72-hour look ahead period” and that “[g]as utility IOUs cannot disconnect [residential customers] when temperatures are expected to be below 32 degrees based on a 72-hour look-ahead period.”³⁹

Consistent with this framework, although OP 4 of D.25-06-012 references SoCalGas, the Joint AL indicated that SoCalGas, as a gas utility, remains subject only to the existing 32°F cold-weather protection threshold,⁴⁰ which no parties disputed in their protests. As such, SoCalGas will not be subject to the implementation, including the suspension of disconnections during extreme heat events or the associated annual Tier 1 Advice Letters with reporting requirements.

³⁸ See D.25-06-012.

³⁹ D.20-06-003 at 14; see also D.20-06-003 at 143 (Conclusion of Law (COL) 8).

⁴⁰ Joint Advice Letter at 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.”).

COMMENTS

Public Utilities Code section 311(g)(1) provides that this Resolution must be served on all parties and subject to at least 30 days public review. Any comments are due within 20 days of the date of its mailing and publication on the Commission's website and in accordance with any instructions accompanying the notice. Section 311(g)(2) provides that this 30-day review period and 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding. The Commission requests that all parties stipulate to a shortened 7-day comment period, via email to Isaac.Tong@cpuc.ca.gov by June 24, 2026.

The 30-day review and 20-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

On June 29, 2026, the Joint IOUs submitted timely comments for the Draft Resolution, expressing support for the approval of the modified Joint IOU proposal for extreme heat protection. They requested a CHS implementation deadline of six months following the issuance of a Final Resolution as well as clarification that heat-triggered disconnection thresholds do not apply to SoCalGas.⁴¹ We find these requested clarifications to be reasonable and have been incorporated them into the Final Resolution.

The Joint Consumer Advocates also submitted timely comments and strongly urged the Commission to adopt the Draft Resolution with the following four recommended clarifications and corrections:⁴²

- 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.
- Clarify that the IOUs should implement the interim threshold of 90° F for halting disconnections immediately upon adoption of the resolution.

⁴¹ Southern California Edison's The Electric IOUs and SoCalGas appreciate the Commission's action on their advice letters and support the Draft Resolution's approval of the modified IOU proposal for extreme heat protection at 2.

⁴² COMMENTS OF THE JOINT CONSUMER ADVOCATES ON DRAFT RESOLUTION E-5468 ISSUED IN RESPONSE TO SCE AL 5707-E ET AL, at 2.

- Direct the IOUs to implement the CHS Level 2 protections within six months of resolution’s adoption, in light of the fact that the CHS application programming interface (API) was released on May 21, 2026.
- Instruct the IOUs to include a summary of CHS implementation costs in their first Tier 1 AL compliance filing.

We concur with these proposed changes and have incorporated them into the Final Resolution.

Lastly, The Center for Biological Diversity, Central California Asthma Collaborative, the Greenlining Institute, and the Affordable Energy Campaign also jointly issued timely comments and concurred with the modifications to the Joint IOU Tier 3 ALs.⁴³ They submitted the following comments :

“Our organizations [...] request that the Commission modify draft Resolution E-5468 to: first, clarify that the adopted protections will not be suspended in three years; second, specifically include the evaluation of the adopted protections in a subsequent phase of Rulemaking 18-07-005 or its successor proceeding; and third, implement these additional public health protections as soon as possible.
...”⁴⁴

The Commission has reviewed these proposed changes and address them here. First, the Draft Resolution does not limit disconnection protections to three years, though the original language in the Resolution may have been ambiguous. We clarify here that the “three years” referenced in the draft resolution refers to the reporting requirement to track the impact results of a CHS Level 2 trigger threshold on arrearages, not a limit for disconnection protections. As for the second request, we note that the Tier 1 AL filing requirements provide sufficient information to evaluate these new heat trigger requirements over time and the Commission may elect to incorporate these evaluations in a future proceeding as necessary. Finally, with regard to the third recommendation, the Commission clarifies that the protection for the 90-degree trigger threshold to halt disconnections will go into effect immediately upon adoption of the Final Resolution by the Commission.

⁴³ Support on Draft Resolution E-5468- request No Sunset and Continued Monitoring at 1.

⁴⁴ Support on Draft Resolution E-5468- request No Sunset and Continued Monitoring at Page 2

FINDINGS AND CONCLUSIONS

1. D.25-06-012 directed Pacific Gas & Electric (PG&E), Southern California Edison (SCE), San Diego Gas & Electric, (SDG&E) , and Southern California Gas Company (SoCalGas) to jointly file a Tier 3 Advice Letter (AL) with a proposal to adjust the temperature thresholds that trigger disconnections suspensions.
2. On December 17, 2025, PG&E, SCE, SDG&E, and SoCalGas filed joint Tier 3 AL 5707-E / 4770-E / 7783-E / 6570-G (Joint IOU AL) to request approval to adjust the current temperature threshold of 100 degrees for halting disconnections during extreme heat events to a new threshold of Level 3 that is reached within a 72 hour forecast period on the CHS, an index created by the California Office of Environmental Health Hazard Assessment pursuant to Assembly Bill (AB) 2238 (Rivas, 2022). Implementation shall occur within 6 months of adoption of a final Resolution.
3. On May 28, 2026, Utility Consumer Action Network (UCAN), Cal Advocates, The Utility Reform Network (TURN), Californians for Accessible Technology (C4AT) and National Consumer Law Center (NCLC) (collectively, Joint Consumer Advocates) filed an Emergency Motion in R.18-07-005, calling for immediate Commission action to direct the IOUs to immediately lower the statewide temperature threshold for suspending disconnections from 100 degrees Fahrenheit to 90 degrees in the summer of 2026. The Joint Consumer Advocates concurrently filed a motion to shorten time in order to facilitate a rapid resolution of the matter.
4. CHS Level 1 equates to a range of approximately 85 to 94 degrees, Level 2 equates to a range of approximately 94 to 98 degrees, and Level 3 equates to a range of approximately 98 to 101 degrees.
5. As defined by heat-related emergency room visits, CHS Level 1 reflects a 0 to 33 percent increase, while CHS Level 2 reflects a 33 to 66 percent increase and CHS Level 3 reflects a 67 to 100 percent increase relative to heat-related emergency room visits relative to baseline conditions.
6. Joint Consumer Advocates filed timely protests to the Joint IOU AL, asserting that Level 3 is too high of a threshold.
7. UCAN proposed using Level 2 as the trigger for disconnection protections, arguing that it better reflects consumer risk during heat events.
8. TURN supports beginning with Level 3 but also recommended that the Commission require the Joint IOUs to provide data to compare the effect of Level 2 relative to Level 3.

9. It is reasonable for CforAT and NCLC to request additional analysis and reporting after the Resolution is issued.
10. It is reasonable for Cal Advocates to assert that the Joint IOUs cannot claim Level 3 offers adequate consumer protection without demonstrating its connection to health risk.
11. The IOUs' proposal to use 100 degrees as the interim trigger threshold to halt disconnections and in the future as a backstop when CHS API data is unavailable is no different than the IOUs' practice prior to the issuance of D.25-06-012.
12. A statewide temperature threshold fails to account for both regional temperature differences and the non-temperature factors which exacerbate health risks,
13. UCAN, TURN, and CforAT/NCLC's proposal of interim measures that would lower the threshold from 100 to 90 degrees and as a backstop threshold when CHS API data is unavailable is reasonable.
14. CHS is a metric that quantifies relative heat exposure across different regions, allowing for the establishment of region-specific thresholds for disconnection suspensions. CHS offers a simple, easily implementable index that summarizes heat risk for each California zip code into a single measure.
15. It is reasonable to implement OEHHA's CHS as the tool to pause disconnections during extreme heat events.
16. It is reasonable that the Joint Electric IOUs implement CHS threshold at Level 2.
17. As it is a gas utility, SoCalGas is not subject to the implementation and reporting requirements associated with suspending disconnections during extreme heat events.

THEREFORE IT IS ORDERED THAT:

1. The request of Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas and Electric Company (Electric IOUs) and Southern California Gas Company to propose adjusting the trigger to waive disconnections from 100 degrees Fahrenheit to Level 3 on the CalHeatScore (CHS) index is modified to Level 2. Implementation of CHS Level 2 by the Electric IOUs shall occur within 6 months of adoption of a final Resolution.
2. Because implementation of the proposal will extend beyond May 1, 2026, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric Company shall set an interim and fallback threshold of 90 degrees Fahrenheit within a 72-hour look ahead period statewide to waive disconnections during extreme heat events when CHS API data is unavailable.

This interim and fallback trigger threshold of 90 degrees Fahrenheit shall be effective immediately upon adoption of a final Resolution.

3. Pursuant to D.25-06-012, Conclusion of Law 9, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric Company may record the incremental costs incurred to implement this decision to their Disconnections Memorandum Accounts.
4. Starting 12 months after the implementation of CHS by the joint IOUs, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric Company shall report, on an annual basis, the impact results of a CHS Level 2 trigger threshold on arrearages, through a Tier 1 Advice Letter. This reporting requirement will continue for three years, by which time the Commission will determine whether to continue the requirement. The first Advice Letter filing shall include a summary of CHS implementation costs.

This Resolution is effective today.

The foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on July 16, 2026; the following Commissioners voting favorably thereon:

/s/ LEUWAM TESFAI
Leuwam Tesfai

Executive Director

JOHN REYNOLDS

President

DARCIE L. HOUCK

KAREN DOUGLAS

CHRISTINE HARADA

Commissioners

Commissioners Matthew Baker recused himself and did not participate in the vote of this item.

Dated July 16, 2026, at San Francisco, California



Center for Accessible Technology

January 6, 2026

VIA ELECTRONIC MAIL (EDTariffUnit@cpuc.ca.gov)

California Public Utilities Commission
Energy Division
Attention: Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102

Re: CforAT and NCLC Protest of SCE Advice Letter No. 5707-E; SDG&E Advice Letter No. 4770-E; Pacific Gas & Electric Company Advice Letter No. 7783-E and SoCalGas Advice Letter No. 6570-G

To the Energy Division Tariff Unit:

Center for Accessible Technology (CforAT) and the National Consumer Law Center (NCLC) jointly submit this timely protest of the Joint Investor-Owned Utilities (IOUs) Advice Letter to Propose Region-Specific Heat Risk Protections, submitted on December 17, 2025. The Joint Advice Letter proposes to move forward with adoption of the CalHeatScore tool authorized under AB 2238 when an API for use of this tool becomes available. It further recommends setting the threshold for customer protection from disconnection at Level 3 of the CalHeatScore, based on a 72-hour look ahead. The IOUs note that the development of the API is still in process, and that they will need additional time to implement this proposal after the Commission issues a resolution directing them to act *and* the API is complete. The IOUs note that none of them are likely to be able to meet the previously-adopted deadline of May 1, 2026 for use of their CalHeatScore proposal,¹ but they propose making no changes whatsoever to the existing single statewide cutoff temperature of 100°F for consumer protections from extreme heat while waiting for the new tool to become available.²

CforAT/NCLC's protest focuses on the lack of any proposal for an interim or fallback measure that provides greater protection from extreme heat risk than currently established. With the addition of an interim/fallback measure of 90°F on a 72-hour look ahead basis, CforAT and NCLC support the IOUs' structural proposal to move toward adoption of the CalHeatScore forecast for ongoing use on a zip-code basis. CforAT/NCLC request additional analysis of the impact of setting the CalHeatScore threshold at Level 3 versus Level 2.

The IOUs Joint Advice Letter (Joint AL) correctly notes that they were directed to work with other interested parties in developing their proposal, but that they were not obligated to find a

¹ Joint AL at p. 9 (table showing "best case scenario" for implementation).

² Joint AL at p. 8, noting an intent to request an extension of the deadline set in D.25-06-012.

consensus among all stakeholders.³ Nevertheless, the fact that their proposal fails to adopt any form of interim protection for Californians while awaiting the ability to implement the preferred option is not acceptable. The contents of the Advice Letter show that all parties, including the IOUs themselves, supported a lowered threshold, though with different recommendations for the reduced threshold level.⁴

An Interim Measure Is Necessary

As recounted in the Joint AL, concerns about the existing threshold for extreme heat protection were first raised to the Commission during the summer of 2024. While the Commission agreed that the concerns were warranted and initiated the current process for addressing them, no additional protections were provided to Californians during the remaining heat-prone months of 2024 or during 2025. Now the IOUs are asking to be relieved of obligations for essentially the entire hot season of 2026, notwithstanding the Commission's adoption of a deadline of May 1, 2026 for new protections to be in place. While the IOUs characterize their anticipated delays as being "short" and only "a matter of months," those months make up the highest period of risk in the current year. Given the IOUs' acknowledgement that the simple action of lowering the heat threshold to less than 100 °F is simple and inexpensive to implement,⁵ there is no basis for failing to take this step until such time as the CalHeatScore system is in place. Additionally, on an ongoing basis, should the CalHeatScore system become inoperable for any reason, the reduced temperature threshold should remain in place as a fallback protective measure

The Interim Threshold Should be Set at 90°F

During the discussions among the parties, the IOUs collected data showing average heat levels on a county basis, and the parties considered setting varying extreme heat thresholds in different areas of the state. In that context, CforAT/NCLC argued that the highest allowable threshold should be set at 95°F, for use in geographic areas where the 98th percentile threshold (the analysis provided by the IOUs) temperature was higher. CforAT/NCLC accepted the IOUs' proposed minimum threshold of 85°F as a cutoff for extreme heat protection in those areas of the state where the 98th percentile was lower. CforAT/NCLC's previously-expressed support for the 95° F level looked to the standard in place in Arizona, and was based on its applicability in areas of the state where residents are accustomed to hot weather.⁶

In contrast, as an interim measure, CforAT/NCLC agree with the IOUs to avoid the costs and complexities of setting different thresholds in different areas of the state, and instead keeping a

³ See D.25-06-12 at p. 35.

⁴ The IOUs expressed willingness to lower the existing threshold from 100°F to 98°F. Joint AL Attachment A . All other stakeholders proposed a reduction to between 90°F and 95°F. *Id.*

⁵ The materials provided with the Joint AL note that UCAN repeatedly stated that simple change in the temperature threshold would enable a near-zero implementation cost, a statement that was not disputed by the IOUs. See Attachment A to Joint AL. See also Attachment C-1 to Joint AL (CforAT/NCLC feedback on Working Group Meeting #3, noting that the IOUs stated that it would be easy and low-cost to implement a simple interim solution of lowering the existing temperature threshold).

⁶ Attachment B-2 to Joint AL.



single temperature cutoff until such time as the CalHeatScore system is in place. With a single threshold, however, the level needs to be more protective of residents in areas of the state that are not accustomed to high temperatures, and who are at heightened risk in the event of an extreme heat event that deviates substantially from the temperatures to which they are acclimated. For that reason, CforAT/NCLC believe that the single interim temperature threshold should be set at 90°F.⁷

While Awaiting the Availability of the API, More Analysis Should be Conducted on the Appropriate Protection Level to Set

The IOUs have proposed using Level 3 on the CalHeatScore scale as the trigger for disconnection levels, with the added protection of retention of a 72-hour look-ahead period.⁸ Other stakeholders, particularly UCAN, have supported use of a Level 2 threshold. It is the understanding of CforAT and NCLC that none of the implementation timeline or structural considerations would differ based on which of these thresholds is adopted by the Commission.

In order to allow for further evaluation of the different impacts of these two proposed settings, and given that there will be a substantial period of time before the use of the CalHeatScore tool is in place regardless, CforAT and NCLC request an opportunity for the Working Group to reconvene and conduct further review of the appropriate CalHeatScore threshold level. In the upcoming Resolution process, the Commission should direct the stakeholders to conduct such a review and report back any further information within 60 days after the resolution is issued. The actual work to implement the proposal would not be impacted while such further analysis is conducted, and the Commission would benefit from further analysis and party feedback.

Conclusion

CforAT and NCLC appreciate the work from both the Commission and the IOUs to move toward an improved form of extreme heat protection for customers. With the addition of an appropriate interim standard and further review of the best threshold for long-term protections, the process proposed by the Joint AL will provide benefits to customers at risk during extreme heat events.

[Signature on subsequent page]

⁷ The IOUs propose to keep the fallback protection level for any time that the CalHeatScore tool is temporarily unavailable at 100°F statewide. Joint AL at p. 9. This proposal would completely fail to provide any of the increased protection that is the goal of the entire exercise currently underway.

⁸ Joint AL at p. 7.



Respectfully submitted,

Melissa W. Kasnitz, Legal Director
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Service List for R.18-07-005

**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.,**

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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/_____
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Date: June 29, 2026

¹⁴ Draft Resolution, p. 12.

¹⁵ Id.