



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

FILED

10/05/26

01:27 PM

A2609002

Application of Pioneer Community Energy for
Compliance Review of its Administration of the
Bioenergy Market Adjusting Tariff Program for
the Period September 1, 2025 through September
1, 2026

A.26-09-002
(Filed September 1, 2026)

**RESPONSE OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) TO THE
APPLICATION OF PIONEER COMMUNITY ENERGY FOR COMPLIANCE REVIEW
OF ITS ADMINISTRATION OF THE BIOENERGY MARKET ADJUSTING TARIFF
PROGRAM FOR THE PERIOD SEPTEMBER 1, 2025 THROUGH SEPTEMBER 1, 2026**

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Dated: October 5, 2026

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I. INTRODUCTION

Pursuant to Rule 2.6 of the Commission’s (“Commission”) Rules of Practice and Procedure, Pacific Gas and Electric Company (“PG&E”) submits this Response to the *Application of Pioneer Community Energy for Compliance Review of its Administration of the Bioenergy Market Adjusting Tariff Program for the Period September 1, 2025 through September 1, 2026* (“Application”), filed on September 1, 2026 and noticed in the Commission’s Daily Calendar on September 4, 2026. Therefore, this Response is timely filed.

In its Application, Pioneer Community Energy (“Pioneer”) states that it has executed six (6) Power Purchase Agreements (“PPAs”) under the Bioenergy Market Adjusting Tariff Program (“BioMAT”).¹ Pioneer describes the purpose of the Application as for the Commission’s compliance review of Pioneer’s administration of its BioMAT program and related activities for September 1, 2025 through September 1, 2026 (“Record Period”).²

II. PG&E’S INTEREST IN THIS PROCEEDING

As the Investor-Owned Utility (“IOU”) in whose service territory the proposed projects will be located and against whose BioMAT allocation the projects’ output will be counted, PG&E is clearly an interested party in this proceeding. As Pioneer states in its Application and supporting testimony, the Pioneer BioMAT PPAs are for one Category 2 and five Category 3

¹ Pioneer Application at 9.

² *Id.* at 1.

BioMAT projects, all located in PG&E's service territory, and plan to be interconnected to PG&E's electric distribution system.³

Further, when the Commission implemented AB 843 in D.23-11-084 to, among other things, open the BioMAT program to Community Choice Aggregators ("CCAs"), the structure implemented allows CCA BioMAT costs recorded in a balancing account to be eligible for recovery through IOU rates. As Pioneer states:

The purpose of the BioMAT CCA Balancing Account ("BMCCABA") is to record the costs of CCAs participating in the BioMAT program. Per the BMCCABA Statement approved by the Commission [...] each CCA participating in the BioMAT program will establish a BMCCABA to record the BioMAT forecasted revenue requirements, reflecting CCA BioMAT program costs. CCAs will include the recorded operation of the BMCCABA for the previous year in their respective compliance applications. The review of the BMCCABA will ensure that the entries made in the BMCCABA are stated correctly and are consistent with applicable Commission decisions.⁴

Although Pioneer states that it has not yet had to utilize its BMCCABA to track costs associated with these new BioMAT contracts,⁵ it will once the projects come online. CCAs participating in BioMAT "are not charging customers for the BioMAT program costs, and therefore will not have an NBC rate schedule[,] [b]ecause the Commission authorized IOUs to recover CCA BioMAT costs through existing NBCs in the IOUs' respective PPP surcharges..."⁶ D.23-11-084 provides that the IOUs will recover CCA BioMAT program costs, net of RA and RPS attribute costs, from customers through the IOUs' Non-Bypassable Charges ("NBCs") included in each respective IOU's Public Purpose Program ("PPP") surcharges.⁷ Thus this

³ Pioneer Prepared Testimony at 12, 22.

⁴ *Id.* at 35.

⁵ *Id.* at 37.

⁶ *Id.*

⁷ D.23-11-084 at Ordering Paragraph 11 ("Each Community Choice Aggregator's BioMAT program costs, net of Resource Adequacy and Renewable Portfolio Standard attribute costs, will be recovered from customers through Pacific Gas and Electric Company, Southern California Edison Company, or San Diego Gas & Electric Company (collectively, the IOUs) non-bypassable charges (NBCs) included in each respective IOU's Public Purpose Program (PPP) surcharges. IOU PPP surcharges will be

Application, if approved, and related proceedings will result in Pioneer's costs for these above-market procurement contracts being recovered in PG&E's rates, and PG&E has a manifest interest on behalf of itself and its customers in ensuring that the Commission's review of such costs holds Pioneer to the same standards used when the Commission reviews PG&E's BioMAT activities.

III. PROPOSED CATEGORIZATION, NEED FOR HEARING, ISSUES TO BE CONSIDERED, AND PROPOSED SCHEDULE

A. Categorization

PG&E agrees with Pioneer that the proceeding should be categorized as "ratesetting."

B. There May Be a Need for Hearings

Pioneer believes the supporting testimony provided with its Application gives the Commission "a sufficient evidentiary record upon which to grant the relief requested on an ex parte basis."⁸ PG&E does not have specific issues that it sees as likely to require hearings at this time but believes it is too early in the process to say definitively that no hearings will be needed.

C. Issues To Be Considered

PG&E has no objection to the issues to be considered as set forth in Pioneer's Application: "The primary consideration of this application is whether Pioneer's administration of the BioMAT program during the Record Period, including the implementation of policies, practices, and procedures described herein, complied with the Commission's BioMAT program requirements and the Commission's prudent contract manager standard."⁹

recorded in the IOUs' PPP Adjustment Mechanism (PPAM) balancing accounts. Independent third-party costs will be shared equally between all IOUs and CCAs participating in BioMAT and shall be collected from customers in NBCs, included in the IOUs' PPP surcharges, and recorded in the IOUs' Public Purpose Program Charge.").

⁸ Pioneer Application at 12.

⁹ *Id.* at 12-13.

D. Schedule

PG&E has reviewed the proposed procedural schedule Pioneer set forth in its Application,¹⁰ and identified some date discrepancies. While PG&E does not have major objections to the general proposed schedule, it suggests some alternate dates below to correct for apparent errors and to avoid the week of the Thanksgiving holiday:

Proceeding Activity	Pioneer Proposed Dates	PG&E Proposed Dates
Application filed	Tuesday, September 1, 2026	
Protests/Responses due	Friday, October 2, 2026	Monday, October 5, 2026 ¹¹
Reply to Protests	Tuesday, October 13, 2026	Wednesday, October 15, 2026 ¹²
Pre-Hearing Conference	Tuesday, November 24, 2026	Tuesday, November 17, 2026
Opening Intervenor Testimony (if any)	Monday, January 12, 2026	Tuesday, January 12, 2027
Concurrent Rebuttal Testimony (if any)	Friday, March 6, 2026	Friday, March 5, 2027
Evidentiary Hearings (if needed)	Wednesday, April 15, 2026	Thursday, April 15, 2027
Opening Briefs (if needed)	Monday, June 1, 2026	Tuesday, June 1, 2027
Reply Briefs (if needed)	Monday, June 15, 2026	Tuesday, June 15, 2027
Proposed Decision	July 2027	
Final Decision	July 2027	

IV. REQUEST FOR PARTY STATUS

Pursuant to Rule 1.4(a)(2) of the Commission's Rules, PG&E requests active party status in this proceeding. The interests of PG&E, as the Investor-Owned Utility in whose service territory all of the projects are located and, in whose rates, approved costs will ultimately be recovered, are not represented by any other known party to this proceeding.

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¹⁰ *Id.* at 13.

¹¹ 30 days from when notice of the Application appeared on the Commission's Daily Calendar.

¹² 10 days from the deadline for filing Protests and Responses.

V. CONCLUSION

PG&E thanks the Commission for the opportunity to take part in this proceeding and looks forward to working with Pioneer, other stakeholders, and the Commission to ensure that Pioneer's BioMAT activities receive the appropriate level of review.

Respectfully Submitted,

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Dated: October 5, 2026