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R2507013

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Improve the California Climate
Credit.

Rulemaking 25-07-013

**EMAIL RULING CHANGING THE SCHEDULE FOR
CLIMATE CREDIT RULEMAKING**

Dated October 20, 2026, at San Francisco, California.

/s/ MARIA SOTERO

Maria Sotero
Administrative Law Judge

From: Sotero, Maria <Maria.Sotero@cpuc.ca.gov>

Sent: Tuesday, October 20, 2026 3:50 PM

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Subject: Email Ruling Changing the Schedule for Climate Credit Rulemaking

To the service list of R.25-07-013, Rulemaking to Improve the California Climate Credit:

This email ruling modifies the procedural schedule and grants parties limited additional time to conduct discovery.

Below, The Utility Reform Network (TURN) requested the opportunity to conduct additional discovery regarding the utilities' implementation assessments filed in this proceeding on October 9. The California Environmental Justice Alliance (CEJA) supported TURN's request. Southern California Edison (SCE) and San Diego Gas & Electric (SDG&E) object to this request and recommend its denial.

While SCE correctly notes that a prior discovery period has ended, that period preceded the recent filing of implementation assessments and was intended to focus on proposal development. Contrary to TURN's indication that additional

discovery could be reflected in reply comments, new information should not be raised in reply comments; therefore, additional time for discovery should precede opening comments.

I share SCE and SDG&E's interest in protecting this proceeding's efficient resolution. However, providing parties with limited additional opportunity to conduct discovery will not cause unreasonable delay, and will hopefully result in better-informed, more specific comments and reply comments. In that interest, and in the interest of supporting parties' ability to understand utility assessments of their proposals, I am making the following changes to the procedural schedule.

Parties *may*, but certainly are not required to, conduct additional discovery, provided that any data requests are received by utilities no later than Friday, October 23, 2026. Discovery requests shall be specific and focused on utilities' October 9 implementation assessments. The utilities will have 10 days to respond to these requests, or until November 4, 2026. The date for opening comments is changed to Monday, November 9, 2026, providing parties the opportunity to integrate insights from discovery responses into their comments. Reply comments will be due on Monday, November 16, 2026. These updated dates are listed below. Prior guidance regarding the service of non-confidential data responses and good-faith collaboration still applies. I greatly appreciate your input and collaboration as we wrap up the important issues in this phase.

The remainder of the procedural schedule is:

- Deadline for party discovery regarding utility implementation assessments: Friday, October 23, 2026
- Due date for utility responses: Wednesday, November 4, 2026
- Parties file opening comments on assigned commissioner proposal, party proposals, other options, and utilities' implementation assessments: Monday, November 9, 2026
- Parties file reply comments: Monday, November 16, 2026

Opening comments shall not exceed 20 pages, and reply comments shall not exceed 12 pages.

It is so ruled.

The Docket Office shall formally file this ruling.

This email is being sent in batches to minimize server rejections.

Maria Sotero (she/her) | Administrative Law Judge | California Public Utilities Commission | maria.sotero@cpuc.ca.gov

Maria Sotero (she/her)

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Subject: [EXTERNAL] RE: (External):Re: (External):R25-07-013 TURN Request for Leave to Serve Limited Discovery on Implementation Assessments

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear ALJs Sotero and Lakey:

SCE continues to object to the request. CEJA, like TURN, offers no specificity of what they require or what good cause justifies the Commission setting aside it's a ruling that was designed to govern the accelerated schedule of this proceeding.

Parties had ample time to propound discovery prior to submitting their proposals to the Commission. They could have asked the IOUs to evaluate the costs of every discrete aspect of their proposals and to demand supporting workpapers of those costs before making any proposal to the Commission. Neither TURN nor CEJA have demonstrated good cause for not having propounded the discovery they required before the discovery cutoff, much less before even submitting proposals to the Commission. The entire cadence of the proceeding, as discussed at the PHC and the ALJ-led workshop was designed to "front load" discovery to avoid this precise last-minute deluge of discovery that would delay the orderly administration of the proceeding.

Moreover, CEJA mischaracterizes the request to reopen discovery to "obtain[] information regarding the IOUs' assessments of proposals" as "narrow." Depending upon the actual discovery propounded, one could perhaps characterize TURN's request for more detailed cost breakdowns as potentially narrow, but it is difficult to fathom anything broader than generalized discovery into "the IOUs' assessment of proposals."

As SCE previously noted, if the Commission does not have adequate evidence on which to render a decision, the Energy Division has unfettered access to the IOUs information and may seek it at any time. SCE contends that at this juncture of the proceeding, party discovery should remain closed because the Commission can assess what, if anything, is missing in the record and propound discovery it requires to render a decision.

Finally, the Commission's rulings should have meaning and absent good cause, parties should comply with them. Neither TURN nor CEJA have demonstrated good cause or otherwise satisfied their burdens to prevail as moving parties. SCE therefore respectfully requests that the Commission summarily deny TURN's motion. If the Commission is willing to entertain the motion, it should require parties seeking to reopen discovery to file formal motions demonstrating with specificity what discovery they require and why and to demonstrate good cause as to why they could not or did not propound that discovery sooner so the IOUs have an opportunity to substantively respond.

Thank you,

Rebecca Meiers-De Pastino

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This message may contain confidential and privileged information. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

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Subject: RE: (External):Re: (External):R25-07-013 TURN Request for Leave to Serve Limited Discovery on Implementation Assessments

Dear ALJ Sotero and ALJ Lakey: CEJA agrees with TURN that, upon its review of IOU implementation assessments, additional data is needed to evaluate implementation cost estimates and comment on the proposals before parties. Therefore, CEJA supports

Dear ALJ Sotero and ALJ Lakey:

CEJA agrees with TURN that, upon its review of IOU implementation assessments, additional data is needed to evaluate implementation cost estimates and comment on the proposals before parties.

Therefore, CEJA supports TURN's request to reopen discovery, narrowly focused on obtaining information regarding the IOUs assessments of proposals.

Respectfully,

Theo Caretto (*he/him*)
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From: deBoer, Krista S <KdeBoer@sdge.com>
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Subject: RE: (External):Re: (External):R25-07-013 TURN Request for Leave to
Serve Limited Discovery on Implementation Assessments

Dear ALJs Sotero and Lakey,

Please note that SDG&E likewise strongly objects to TURN's request on the same grounds stated by SCE.

Respectfully,
Krista deBoer
Senior Counsel, SDG&E

From: Rebecca Meiers-De Pastino <Rebecca.Meiers.DePastino@sce.com>
Sent: Tuesday, October 20, 2026 11:07 AM
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Ajay.Kumar@Pacifcorp.com
Subject: [EXTERNAL] RE: (External):Re: (External):R25-07-013 TURN Request
for Leave to Serve Limited Discovery on Implementation Assessments

Dear ALJs Sotero and Lakey: SCE reiterates its objection on the same grounds. Again, TURN continues to fail to even state that it requires additional discovery, much less describe with any specificity what cost estimates require a breakdown

Dear ALJs Sotero and Lakey:

SCE reiterates its objection on the same grounds. Again, TURN continues to fail to even state that it requires additional discovery, much less describe with any specificity what cost estimates require a breakdown that inhibits TURN's ability (as opposed to speculating about parties generally) to respond to any IOU's implementation assessments or proposals.

As always, SCE will submit to any discovery propounded by the Commission's Energy Division (or Cal Advocates) if the Commission determines that it lacks sufficient evidence to issue a decision based on the record and will serve any such discovery responses on the service list if the Commission directs it to do so, but SCE respectfully submits that TURN's request lacks the essential hallmarks of a motion that warrants any consideration, especially given this proceeding's need for an accelerated schedule.

Thank you,

Rebecca Meiers-De Pastino

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This message may contain confidential and privileged information. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

From: Ruthie Lazenby <rlazenby@turn.org>
Sent: Tuesday, October 20, 2026 10:58 AM
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Subject: (External):Re: (External):R25-07-013 TURN Request for Leave to Serve Limited Discovery on Implementation Assessments

Dear ALJs Sotero and Lakey: TURN acknowledges that the discovery period provided time for parties to propound discovery related to credit proposals. However, because the discovery period concluded on September 9, and the implementation assessments

Dear ALJs Sotero and Lakey:

TURN acknowledges that the discovery period provided time for parties to propound discovery related to credit proposals. However, because the discovery period concluded on September 9, and the implementation assessments were filed and served October 9, parties have not had an opportunity to propound discovery on implementation assessments. To the extent that the Commission plans to rely on the implementation assessments as part of its decision-making process, allowing discovery would allow the Commission to have a more complete and accurate record. On the other hand, not allowing discovery could be prejudicial to other parties.

Each of the implementation assessments includes cost estimate ranges that do not consistently break out the costs of different elements. TURN does not object to such ranges but permitting parties to ask clarifying questions regarding these

estimates would help provide information needed to more effectively incorporate the assessments into party's recommendations to the Commission. The implementation assessments were not accompanied by workpapers that parties could otherwise review to understand the estimates at a more granular level.

Respectfully,

Ruthie Lazenby

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From: Rebecca Meiers-De Pastino <Rebecca.Meiers.DePastino@sce.com>
Date: Tuesday, October 20, 2026 at 9:53 AM
To: Ruthie Lazenby <rlazenby@turn.org>; Lakey, Jonathan <Jonathan.Lakey@cpuc.ca.gov>; Sotero, Maria <Maria.Sotero@cpuc.ca.gov>
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Subject: RE: (External):R25-07-013 TURN Request for Leave to Serve Limited
Discovery on Implementation Assessments
Dear ALJs Sotero and Lakey:

SCE objects to this request. This proceeding has an accelerated schedule to allow for implementation of whatever proposal the Commission adopts. To that end, the Commission spent considerable time and effort designing the schedule to include a discovery period and cutoff. The schedule and discovery cadence were discussed at length with all parties at the PHC and the ALJ-led workshop. Parties have had ample opportunity to comment on a set discovery period, propound discovery, and prepare and respond to proposals.

TURN's vague assertion that it has "observed that [the IOUs assertions] lack certain supporting calculations and details should not be sufficient to render the Commission's rulings meaningless and jeopardize the schedule of this proceeding. TURN does not even assert that it is the party that requires more details, if it is making the request on the behalf of itself or other parties, or what those details are. Instead, it speculates about the needs of parties generally. TURN's bare assertions would not be sufficient to prevail on a motion to compel and should not be sufficient to undermine the Commission's ruling establishing a discovery period and cut off in this case.

SCE respectfully requests that if the Commission entertains TURN's request, it should require TURN to file a formal motion that satisfies its burden to come forward with specific facts and prove that it requires data to which it did not have access during the discovery period so that the IOUs can substantively respond to such assertions and the Commission has a record on which to decide such a motion.

Alternatively, and preferably, the Commission should preserve the sanctity of its discovery ruling and the schedule it set for this proceeding and deny the request.

Thank you,

Rebecca Meiers-De Pastino

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Subject: (External):R25-07-013 TURN Request for Leave to Serve Limited Discovery on Implementation Assessments

Dear ALJ Sotero and ALJ Lakey: TURN recognizes that the discovery period in this proceeding has closed. In reviewing IOU implementation assessments, however, TURN has observed that they lack certain supporting calculations and details. With

Dear ALJ Sotero and ALJ Lakey:

TURN recognizes that the discovery period in this proceeding has closed. In reviewing IOU implementation assessments, however, TURN has observed that they lack certain supporting calculations and details. With the discovery period closed, parties will not have an opportunity to seriously evaluate these cost estimates.

TURN respectfully requests leave to serve limited discovery regarding IOU implementation assessments. While responses would not arrive in time for parties' opening comments, they could be incorporated into reply comments.

Thank you for your consideration,

Respectfully,

Ruthie Lazenby

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