BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIF

Order Instituting Rulemaking to Modernize the Electric Grid for a High Distributed Energy Resources Future.	Rulemaking 21-06-017 (Filed June 24, 2021)

FILED
11/03/26
10:24 AM
R2106017

MOTION FOR PARTY STATUS OF DONALD C. JACKSON

I. INTRODUCTION

Donald C. Jackson respectfully moves for party status in this proceeding under Rule 1.4 of the Commission's Rules of Practice and Procedure.

II. INTEREST IN THIS PROCEEDING

This motion is made on behalf of Donald C. Jackson, an individual. Mr. Jackson publishes independent analysis of grid coordination standards and California energy policy at grid-coordination.energy, under the standing description “Independent. No utility, no manufacturer, no aggregator, nothing to sell.” He is not employed by, and does not appear on behalf of, any party to this proceeding, and he has nothing to sell to the customers or the utilities this proceeding affects.

Mr. Jackson's interest is in how a dynamic capacity limit and a dynamic price reach the equipment inside a customer's home or building. That is the subject of Track 3 and of the workshops the Proposed Decision directs. It is also work he has built and operates rather than only written about.

He is a contributor to the standard this proceeding's signals travel on. Mr. Jackson is a significant contributor to the OpenADR 3 standard and led the effort that added additional push notification protocols to version 3.1; his published OpenADR 3.1 server implementation carries that capability. He is an active participant in the Matter Energy Management working group, Matter being one of the two local protocols Pacific Gas and Electric Company has identified for delivering a dynamic limit to customer equipment.

He founded and leads a second open interoperability effort. Electrification Bus, at ebus.energy, is an open interoperability framework for home energy infrastructure devices:

battery energy storage, photovoltaics, smart panels and utility meters. Those are the devices on the customer side of the equipment this proceeding addresses.

He has served in a public utility role. Mr. Jackson served as a Commissioner on the Utilities Advisory Commission of the City of Palo Alto from June 2019 to May 2021, and has continued to participate in that city's utility proceedings since, by public comment on home electrification and solar permitting among other subjects.

He operates the delivery path at issue here, publicly and at no charge. Mr. Jackson runs a free, public OpenADR 3 server that streams real hourly California electricity prices and grid emissions: CAISO Day-Ahead prices for Pacific Gas and Electric Company and Southern California Edison Company, prices computed from the published rate schedules of San Diego Gas & Electric Company, the Los Angeles Department of Water and Power and the City of Palo Alto, and marginal emissions for eleven grid regions. There is no account, no contract and no enrollment, and the interface is open to anyone at price.grid-coordination.energy.

He publishes open-source software at both ends of that path. A Virtual Top Node server implementation, client libraries in Clojure and Python distributed through Clojars and the Python Package Index, and a Home Assistant integration carried in the default HACS repository that receives the signal and orchestrates a household's loads against it. All of it is MIT licensed and published at github.com/grid-coordination.

He has demonstrated the complete grid-to-appliance path end to end, with a live price server, a residential energy manager and three responding appliances: at the 2025 California Demand Flexibility Summit of May 22, 2025, hosted by the California Energy Commission with the University of California, Davis and Lawrence Berkeley National Laboratory, and again at the 2026 California Energy Commission and EPRI Electrification Summit.

He has been invited to present to the California Energy Commission before. At the Commission's invitation, Mr. Jackson presented his analysis and recommendations to the Commission's Interoperability Working Group on July 9, 2025.

He is an invited speaker at the California Energy Commission's Commissioner Workshop on Interoperability of November 4, 2026, in Docket 24-FDAS-02, addressing the interoperability of the protocols that carry these signals.

He has written for this Commission's staff, including “Two Signals, Six Tests,” published at grid-coordination.energy and prepared for California Public Utilities Commission and California Energy Commission staff.

He has already participated in this proceeding, by public comment submitted under Rule 1.18 on November 2, 2026.

III. CONTENTIONS

Pursuant to Rule 1.4(b)(2), Mr. Jackson states the following factual and legal contentions, each of which is pertinent to issues already presented in this proceeding.

First, the operating envelope and the price should reach the customer, and not only an intermediary. The Proposed Decision describes PG&E's Flex Connect as delivering day-ahead hourly operating limits “to the customer's technology provider” (Section 4.1.3). A customer who changes technology providers, or who has none, is then without the operating limit that governs the customer's own service. Mr. Jackson contends that the limit, and the price, should be published to the customer in machine-readable form over an open protocol, with a server address the customer can configure.

Second, the interoperability questions the Proposed Decision defers should be decided in the workshops it orders, and decided as capability requirements. Section 11 defers interoperability and customer choice to a workshop rather than adopting the baseline open access rules and the protocol-neutrality principles that parties proposed. Ordering Paragraph 18 directs that workshop, and Ordering Paragraph 9 directs a separate interoperability testing and certification workshop. Mr. Jackson contends that those workshops should resolve, rather than restate, by what open protocol the price and the operating envelope reach customer equipment, and whether a customer may obtain both without a program administrator, an aggregator, or a manufacturer's cloud service in the path; and that any requirement adopted should name a

capability and an open standard against which conformance can be tested by a party other than the equipment vendor.

Third, the record already shows that local delivery of a dynamic limit is practicable, and the Proposed Decision does not reflect it. PG&E's supplemental response of December 10, 2025 describes an application hosted on an AMI 2.0 meter that connects to the customer's electric vehicle charger or smart panel locally and sends a real-time dynamic limit, and identifies two local protocols for that purpose. Mr. Jackson contends that this capability, and the question whether a customer may rely on it, belong in the Commission's consideration of Grid Edge DERMS under Section 10 and in the advice letters directed by Ordering Paragraph 17.

Fourth, the customer data directed by Ordering Paragraph 4 should be available in machine-readable form. The five values identified in Ordering Paragraph 4 are the values a customer or an authorized agent needs. A response furnished by web form within thirty days of a request cannot be read by equipment and cannot carry a value that changes. Mr. Jackson contends that the same values should also be available through a documented, machine-readable interface.

These contentions address Sections 4.1.3, 10 and 11 of the Proposed Decision and Ordering Paragraphs 4, 9, 17 and 18, all of which are issues already presented.

IV. NOTICE

Service of notices, orders, rulings and other correspondence in this proceeding should be directed to:

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V. CONCLUSION

Mr. Jackson's participation will not prejudice any party, will not delay the schedule, and will not broaden the scope of the issues in this proceeding. He seeks to participate in the workshops

directed by Ordering Paragraphs 9 and 18 and in the written phases associated with them. For the reasons stated above, Mr. Jackson respectfully requests that the Commission grant this Motion for Party Status.

Dated: November 3, 2026

Respectfully submitted,

/s/ DONALD C. JACKSON
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