BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED
11/09/26
04:59 PM
R2106017

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

OPENING COMMENTS OF THE UTILITY CONSUMERS' ACTION NETWORK (UCAN) ON COMMISSIONER HOUCK'S TRACK 3 PROPOSED DECISION ON FLEXIBLE SERVICE CONNECTIONS

Samuel Golding
President
Community Choice Partners, LLC

Jane Krikorian
Staff Attorney
Utility Consumers' Action Network
404 Euclid Avenue
San Diego, CA 92114
619-696-6966
jane@ucan.org

November 9, 2026

TABLE OF CONTENTS

I. INTRODUCTION 1

II. COMMENTS 2

A. UCAN APPRECIATES THE PD'S CAREFUL DEVELOPMENT OF THE TRACK 3 RECORD 2
B. UCAN SHARES AND SUPPORTS THE PD'S VISION 2

III. RECOMMENDATIONS AND CLARIFICATIONS 3

A. TECHNOLOGY AND PROVIDER NEUTRALITY PRINCIPLES & CUSTOMER CHOICE AND INTEROPERABILITY WORKSHOP 3
B. MINIMUM DATA TRACKING REQUIREMENTS FOR FSC CUSTOMERS 6

IV. CONCLUSION 9

APPENDIX A: UCAN PROPOSED REVISIONS 10

SUMMARY OF RECOMMENDATIONS

UCAN recommends that the PD:

1) Adopt technology and provider neutrality as a principle governing FSC implementation, along with the requirement that it be discussed in the IOUs' FSC Implementation Advice Letters, while reserving implementation details to the Customer Choice and Interoperability Workshop, similar to how the Commission ensured implementation of the guiding principles in Track 2.
2) Specify a deadline to produce the Customer Choice and Interoperability Workshop Report, in Table 3 and Ordering Paragraph 18, and additionally conform Ordering Paragraph 18 to the body of the PD by specifying that the workshop report, in addition to the workshop recording, be served to the service lists for the Data Access and Cost Effectiveness Rulemaking (R.22-11-013), the Energization Rulemaking (R.24-01-018), and any successor to this proceeding, in addition to this rulemaking (R.21-06-017).
3) Correct the summary of UCAN's data tracking recommendations and complete the minimum data tracking requirements for FSC customers on dynamic rates to include (i) whether the customer is in a disadvantaged community, (ii) whether the FSC is bridging or non-bridging, and (iii) the reason the customer declined enrollment in, or later opted out of, a dynamic rate.

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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

OPENING COMMENTS OF THE UTILITY CONSUMERS' ACTION NETWORK (UCAN) ON COMMISSIONER HOUCK'S TRACK 3 PROPOSED DECISION ON FLEXIBLE SERVICE CONNECTIONS

I. INTRODUCTION

Pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure, the Utility Consumers' Action Network (UCAN)[1] submits the following comments on the proposed *Decision Addressing Track 3 Issues Directing Large Investor-Owned Utilities to Support Affordability Through Flexible Service Connections* (PD) issued October 20, 2026.

The PD directs Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company, collectively the Investor-Owned Utilities (IOUs), to expand the availability and use of flexible service connections (FSCs) so that customers can connect to the grid using available distribution capacity while deferring or avoiding upgrades where feasible.[2] Among other things, the PD extends the Standard Offer to SDG&E, directs persistent non-bridging offerings, scales PG&E's ChargeBoost and PanelBoost pilots across the three IOUs, adopts customer education and data tracking for FSC customers on dynamic rates, establishes standardized data reporting, and closes this proceeding.[3]

UCAN appreciates the Commission's focus on affordability. As the PD notes, "This decision advances affordability by requiring the IOUs to evaluate lower-cost mitigations when

[1] UCAN is a 501(c)(3) non-profit public benefit corporation dedicated to protecting and representing the interests of residential and small business customers in the San Diego Gas & Electric service territory. Approximately 98% of UCAN's members are residential customers. UCAN has been active in Commission proceedings since 1983 and strives to meet the Commission's goals for rates that are equitable and affordable for all ratepayers.
[2] Commissioner Houck's proposed *Decision Addressing Track 3 Issues Directing Large Investor-Owned Utilities to Support Affordability Through Flexible Service Connections* (PD), issued October 20, 2026, at 2.
[3] PD at 3–4; Ordering Paragraph 22.

these options meet the needs of a proposed connection and defer or avoid the need for a more costly upgrade."[4] UCAN also agrees with the PD when it states that expanding FSCs "allows for greater use of existing distribution capacity, additional customer connection options, reduction in infrastructure costs, and development of technical and operational capabilities needed to support these options over time."[5] As ratepayer advocates, UCAN strongly supports these outcomes. It is UCAN's goal to support the PD with a small number of recommendations that secure what the PD already sets out to do.

II. COMMENTS

A. UCAN Appreciates the PD's Careful Development of the Track 3 Record

UCAN appreciates the PD's breadth and its careful treatment of the Track 3 record. The PD takes the Assigned Commissioner's Proposal (ACP), the Track 3 workshops, and two rounds of party comments and turns them into a sequenced set of flexible connection offerings, with implementation timed to the complexity of each measure and the capabilities of each IOU's system.[6] UCAN also appreciates the PD's thorough and accurate documentation of party contributions, which reflects the considerable effort parties made throughout Track 3.

B. UCAN Shares and Supports the PD's Vision

UCAN shares and supports the PD's vision of flexible connections as a tool for affordability. The PD adopts several of UCAN's recommendations, including: directing the IOUs to record and provide the service and demand data customers need to establish self-managed Limited Power arrangements;[7] extending the Standard Offer, including a non-bridging Standard Offer, to SDG&E on terms consistent with D.26-02-025;[8] keeping enrollment in

[4] PD at 2.
[5] PD at 3.
[6] PD at 2; see also PD at 152–154 (Section 16, Timing of Implementation Steps).
[7] PD at 54–55; Ordering Paragraph 4.
[8] PD at 63, 86; Ordering Paragraphs 5 and 11.

dynamic rates opt-in, with rate options and estimated bill comparisons presented to customers;[9] and adopting a standardized set of metrics to be reported for all FSC types across all IOUs.[10] Accordingly, UCAN offers the following recommendations for a few clarifications and procedural guardrails that will help ensure the PD's affordability benefits are realized and can be tracked.

III. RECOMMENDATIONS AND CLARIFICATIONS

A. Technology and Provider Neutrality Principles & Customer Choice and Interoperability Workshop

Section 11 of the PD agrees that flexible connection frameworks "should not inadvertently create barriers to participation or confer undue advantages on particular technologies, vendors, or market actors," and that "technology and provider neutrality will help ensure wider compatibility of flexible connection frameworks."[11] Rather than adopt guidelines now, the PD directs a workshop on customer choice and interoperability within 90 days, timed "to help inform the IOUs AL filings."[12] UCAN supports the workshop as the forum for working out how technology and provider neutrality should be implemented, and previously proposed four implementation requirements on these subjects, which the PD recites.[13]

UCAN is concerned, however, that the PD makes no finding or conclusion that technology and provider neutrality should guide FSC implementation,[14] defers "adopting any guidelines or implementing standards" until after a workshop that is to produce a recording and a report, with no further Commission action directed,[15] and orders the FSC Implementation Advice

[9] PD at 132–133; Conclusion of Law 40.
[10] PD at 148; Ordering Paragraph 20 and Appendix D.
[11] PD at 127.
[12] PD at 127–128; Ordering Paragraph 18.
[13] PD at 126–127, fn. 428, citing *Opening Comments of the Utility Consumers' Action Network on the Assigned Commissioner's Proposal on Flexible Service Connections* (UCAN Opening Comments), filed July 27, 2026, at 18.
[14] Compare PD at 127 with Finding of Fact 41 and Conclusion of Law 39.
[15] PD at 127–128; Ordering Paragraph 18.

Letters filed within 120 days under an Appendix A that does not mention the subject.[16] The advice letters will therefore be drafted, and reviewed by Energy Division, with no adopted principle or corresponding implementation requirements to apply.

This is the sequencing the Commission declined to follow in the recently adopted Track 2 decision, D.26-10-054. There, the Commission held that principles "must be established up-front to create consistency and protect public policy interests during development of IOU applications" and rejected proposals to "modify and refine guiding principles in proceedings where IOU applications are being reviewed."[17] It adopted eleven principles by decision, including "technology-neutral, performance-based" and "open access and interoperability," and assigned a pre-filing working group the narrower task of refining how those principles would be implemented.[18] It also required the IOUs to explain how their proposals "enable open and non-discriminatory participation" and to justify "any proposed deviation" from open, standardized, and interoperable protocols.[19] UCAN respectfully requests that the Commission take the same approach here: state the principle in the decision, and leave implementation to the workshop. Specifically, UCAN proposes:

1. The following finding of fact, to follow Finding of Fact 41:

> "Flexible connection frameworks should not inadvertently create barriers to participation or confer undue advantages on particular technologies, vendors, or market actors, and technology and provider neutrality will help ensure wider compatibility of flexible connection frameworks."

2. The following conclusion of law, to follow Conclusion of Law 39:

[16] PD, Ordering Paragraph 1; PD, Appendix A.
[17] D.26-10-054, *Decision Adopting an Application Process for Utility Distributed Energy Resources Orchestration and Ordering Utilities to Incorporate Load Flexibility Scenarios into Their Distribution Planning and Execution Processes* (Track 2 Decision), adopted October 29, 2026, at 23.
[18] D.26-10-054, Ordering Paragraphs 2(a) and 8.
[19] D.26-10-054, Ordering Paragraphs 19 and 27.

"The IOUs' FSC Implementation Advice Letters should describe how the proposed processes conform to the principles of technology and provider neutrality and justify any proposed deviation."

3. The following addition to the Appendix A "HDER FSC Implementation AL Requirements":

"(g) Interoperability and Customer Choice: A description of how the proposed processes conform to the principles of technology and provider neutrality described in Section 11 of this decision, informed by the customer choice workshop, or a justification for any deviation."

These additions would serve to implement the technology and provider neutrality principle articulated in the ACP and affirmed in Section 11 of the PD,[20] keep the workshop focused on how the principle should be implemented rather than on whether it applies, and give Energy Division a stated basis for reviewing each advice letter on the same terms.

Relatedly, the body of the PD states that the workshop report and link to the recording shall be served on the service lists of this proceeding, the Data Access and Cost Effectiveness Rulemaking, the Energization Rulemaking, and any successor to this proceeding.[21] Ordering Paragraph 18, however, directs only that the link to the recording be served, and only on the service list of this proceeding, and Table 3 specifies the timing of the workshop but not of the report.[22]

Given that the purpose of the workshop is to inform the IOUs' FSC Implementation ALs, which are due 120 days after issuance of the decision,[23] and the PD directs the workshop to be held within 90 days of the issuance of the decision, UCAN recommends that the workshop report be due 30 days after conclusion of the workshop. This would allow for the workshop report to be served simultaneously with the IOUs' FSC Implementation ALs, or earlier if the workshop is

[20] PD at 124 (citing ACP at 39), 127.
[21] PD at 128.
[22] PD Ordering Paragraph 18; PD at 154 (Table 3).
[23] PD at 128 (workshop timing "meant to help inform the IOUs AL filings"); Ordering Paragraph 1; PD at 153 (Table 2).

held sooner than 90 days after issuance of the decision. UCAN's proposed addition to Table 3 is shown below:

Workshop or Report Topic	**Designated IOUs**	**Timing**
Customer Choice and Interoperability Workshop	PG&E, SCE, SDG&E (joint)	90 days after issuance of Decision
Customer Choice and Interoperability Workshop Report	PG&E, SCE, SDG&E (joint)	30 days after conclusion of workshop

UCAN respectfully requests that Ordering Paragraph 18 be conformed to the body of the PD, and to the workshop report timeline proposed above, by revising it as follows (additions underlined, deletion in strikethrough):

> 18. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company (together, the IOUs) shall jointly host, in coordination with Energy Division staff, a workshop focused on discussing reasonable guardrails regarding customer choice and competition within 90 days of the issuance of this decision. The IOUs shall record the workshop, provide the recording to Energy Division staff to post on the High DER/Distribution Planning webpage on the Commission website, develop a workshop report within 30 days of the workshop, and serve ~~the service list of this rulemaking with~~ the link to the webpage where the recording can be found and the workshop report on the service lists for this proceeding (R.21-06-017), the Data Access and Cost Effectiveness Rulemaking (R.22-11-013), the Energization Rulemaking (R.24-01-018), and any successor to this proceeding.

B. Minimum Data Tracking Requirements for FSC Customers

UCAN appreciates the PD's adoption of minimum data tracking requirements for FSC customers on dynamic rates. In its opening comments, UCAN recommended three additions to the ACP's data tracking proposal: (i) realized bill impacts relative to the customer's prior rate; (ii) the timing of and stated reasons for customers' dynamic rate enrollment decisions; and (iii) enrollment demographics sufficient to monitor participation in disadvantaged communities.[24] The PD's summary of party comments, however, records only the first of these: "UCAN recommends adding realized bill impacts relative to a customer's previous rate," citing the page

[24] UCAN Opening Comments at 22, 26.

of UCAN's comments on which all three appear.[25] The discussion then finds "the recommendations for additional data collection requirements from UCAN and Cal Advocates compelling," declines two of Cal Advocates' items on feasibility grounds, and adopts the remainder, including UCAN's bill impact field.[26] The two recommendations omitted from the summary are also omitted from the adopted list, without discussion.[27] UCAN respectfully requests that the summary of party comments at page 135 be corrected to reflect UCAN's full recommendation, and that the two omitted fields be added to the adopted list.

In addition, the adopted list omits two fields that were part of the ACP's own proposal: whether the customer is bridging or non-bridging, and, for customers who do not enroll, the reason given.[28]

UCAN does not believe that requiring the additional data elements proposed by the ACP and by UCAN would be unduly burdensome for the IOUs to collect: disadvantaged community status can be determined from the service address under the State's existing designations; whether a customer is bridging or non-bridging is a feature of the arrangement the IOU administers; and the reason a customer declines to enroll can be recorded at the time of the offer, as the ACP itself proposed.[29]

The PD states that the purpose of the data tracking is to "track the rate of enrollment of FSC customers on real-time pricing rates, understand any reasons for declining to enroll, and understand what types of customers may be more likely to take advantage of both FSCs and real-time pricing rates."[30] However, without the declination fields, the Commission will know how

[25] PD at 135, fn. 460, citing UCAN Opening Comments at 26.
[26] PD at 135–136.
[27] PD at 136; PD, Appendix A(f).
[28] PD at 134 (reciting the ACP's proposed fields, including "[b]ridging vs. non-bridging customer" and "[i]f not enrolled in a real-time pricing rate, reason given for opting out"); ACP at 55.
[29] PD at 134; ACP at 55.
[30] PD at 134.

many FSC customers enroll in a dynamic rate but not the reason why the others have declined enrollment, or later chosen to opt out. Similarly, absent reporting of participation within disadvantaged communities, the Commission will be unable to tell whether flexible connections and dynamic rates are reaching those communities as a benefit or concentrating in them as a burden. The PD notes, citing UCAN's opening comments, that the population ChargeBoost targets "skew heavily toward disadvantaged communities and the lowest-income households,"[31] so the customers first in line for flexible connections paired with dynamic rates will disproportionately be those least able to absorb bill volatility or a degraded connection. The PD also recites UCAN's position that no customer should be "steered toward non-firm service as their only timely option."[32] Tracking enrollment by disadvantaged community status is what allows the Commission to distinguish the benefit, which is electrification without a costly upgrade, from the burden, whether through adverse bill impacts, declinations, or non-firm service offered where comparable customers elsewhere receive firm capacity; without it, these outcomes will be visible only in the aggregate, and not for the customers the Commission has the greatest reason to watch. Lastly, UCAN observes that the "offering/program" field that the PD proposes to track does not capture bridging status where an offering, such as the Standard Offer, has both bridging and non-bridging variants; presumably, this is why the ACP distinguished between "Flexible connection offering/program" and "Bridging vs. non-bridging customer", and proposed to track both data fields.

Based on the foregoing, UCAN respectfully requests that the minimum data tracking requirements at Section 12.2.2 and Appendix A(f) be amended to add:

"• <u>Bridging vs. non-bridging customer.</u>

[31] PD at 114, fn. 387, citing UCAN Opening Comments at 10.
[32] PD at 27, citing UCAN Opening Comments at 27–28.

• If the customer declines enrollment in a dynamic rate, or later leaves the rate: the timing of, and any stated reason for, the decision.

• Whether the customer is located in a disadvantaged community."

IV. CONCLUSION

UCAN appreciates the considerable effort by the Commission to develop the record on this complex proceeding and the opportunity to provide these comments. UCAN's recommendations are meant to ensure that the principle the PD endorses is adopted and carried into implementation, and that the data needed to confirm affordability benefits is collected, so that ratepayers can realize the full benefits of flexible service connections.

Respectfully submitted,
/s/ Jane Krikorian

Jane Krikorian
Staff Attorney
Utility Consumers' Action Network
404 Euclid Avenue, San Diego, CA 92114
(619) 696-6966
jane@ucan.org

November 9, 2026

Appendix A: UCAN Proposed Revisions

(additions underlined, deletions in ~~strikethrough~~)

1. Section 12.2.1 (p. 135), summary of party comments

"UCAN recommends adding realized bill impacts relative to a customer's previous rate, the timing of and stated reasons for customers' enrollment decisions, and enrollment demographics sufficient to monitor participation in disadvantaged communities."

2. Section 12.2.2 (p. 136) and Appendix A(f), minimum data tracking requirements

Add to the list:

"• Bridging vs. non-bridging customer.

• If the customer declines enrollment in a dynamic rate, or later leaves the rate: the timing of, and any stated reason for, the decision.

• Whether the customer is located in a disadvantaged community."

3. Table 3 (pp. 153–154), Workshops and Reports Timing

Add the following row, at the end of the table:

Workshop or Report Topic	**Designated IOUs**	**Timing**
Customer Choice and Interoperability Workshop	PG&E, SCE, SDG&E (joint)	90 days after issuance of Decision
Customer Choice and Interoperability Workshop Report	PG&E, SCE, SDG&E (joint)	30 days after conclusion of workshop

4. Findings of Fact and Conclusions of Law

Add, following Finding of Fact 41:

"Flexible connection frameworks should not inadvertently create barriers to participation or confer undue advantages on particular technologies, vendors, or market actors, and technology and provider neutrality will help ensure wider compatibility of flexible connection frameworks."

Add, following Conclusion of Law 39:

"The IOUs' FSC Implementation Advice Letters should describe how the proposed processes conform to the principles of technology and provider neutrality and justify any proposed deviation."

5. Ordering Paragraph 18

"Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company (together, the IOUs) shall jointly

host, in coordination with Energy Division staff, a workshop focused on discussing reasonable guardrails regarding customer choice and competition within 90 days of the issuance of this decision. The IOUs shall record the workshop, provide the recording to Energy Division staff to post on the High DER/Distribution Planning webpage on the Commission website, develop a workshop report within 30 days of the workshop, and serve ~~the service list of this rulemaking with~~ the link to the webpage where the recording can be found and the workshop report on the service lists for this proceeding (R.21-06-017), the Data Access and Cost Effectiveness Rulemaking (R.22-11-013), the Energization Rulemaking (R.24-01-018), and any successor to this proceeding."

6. Appendix A, HDER FSC Implementation AL Requirements

Add, following element (f):

"(g) Interoperability and Customer Choice: A description of how the proposed processes conform to the principles of technology and provider neutrality described in Section 11 of this decision, informed by the customer choice workshop, or a justification for any deviation."