BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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

OPENING COMMENTS OF UNIVERSAL DEVICES ON PROPOSED DECISION ADDRESSING TRACK 3 ISSUES DIRECTING LARGE INVESTOR-OWNED UTILITIES TO SUPPORT AFFORDABILITY THROUGH FLEXIBLE SERVICE CONNECTIONS

November 9, 2026

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I. INTRODUCTION

Universal Devices respectfully submits these Opening Comments on the Proposed Decision Addressing Track 3 Issues Directing Large Investor-Owned Utilities to Support Affordability Through Flexible Service Connections ("Proposed Decision"), mailed in this proceeding on October 20, 2026. These Opening Comments are timely filed and served pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure and the instructions accompanying the Proposed Decision

II. BACKGROUND

Universal Devices is the developer of NuCore, an open-source, non-profit-governed smart home and energy platform that provides the device-level intelligence, protocol translation, and policy execution layer that current standards-based approaches do not address. NuCore is not a proposal or a roadmap - it is running today on deployed hardware, with source code available on GitHub. Universal Devices holds Open Automated Demand Response ("OpenADR") 2.0a, 2.0b, and 3.0 certification, has active projects with Pacific Gas and Electric Company ("PG&E") and Southern California Edison ("SCE"), and has participated in California Energy Commission ("CEC") grant programs including CalFUSE.

III. SUMMARY OF UNIVERSAL DEVICES' RECOMMENDATIONS

Universal Devices largely supports the Proposed Decision. However, Universal Devices requests that the Commission confirm that the Final Decision's definition of Grid Edge Distributed Energy Resource Management System ("DERMS") describes functions. In addition, this decision must not require that those functions be performed in utility-owned metering hardware or inside the meter.

IV. THE PROPOSED DECISION SHOULD BE MODIFIED TO CLARIFY THAT THE GRID EDGE DERMS DEFINITION IS FUNCTIONAL

The Proposed Decision defines Grid Edge DERMS as performing "sensing, computation, and [distributed energy resource ("DER")] management locally within the area served by a common set of secondary distribution infrastructure."[1] The only implementation the Proposed Decision describes is PG&E's ChargeBoost, which uses "an [Advanced Metering Infrastructure ("AMI")] 2.0 meter with Grid Edge computing capable of running software applications in addition to core metering functions."[2]

The Proposed Decision also requires each investor-owned utility's ("IOU's") advice letter to propose "clear, technology neutral criteria for equipment eligibility," to identify "which components of the architecture (e.g., metering, communications, control logic) are proprietary and which are built on open standards," and to describe "what role third parties potentially can play to provide functionally equivalent Grid Edge DERMS services if at a lower cost and with greater implementation efficiencies."[3]

[1] Proposed Decision, at p. 108.
[2] *Id.*, at p. 110.
[3] *Id.*, at p. 110 and p. 175 (Ordering Paragraph 17(a)-(b)).

Energy Division-led workshops are to include five topics, to the extent not already addressed, among them "[w]hether AMI meters are the appropriate long-term solution for computing the Operating Envelope" and ensuring "that more devices than EV chargers can be locally controlled."[4]

Taken together, these passages indicate that the definition is meant to be functional. The Proposed Decision requires each IOU to disclose which components are proprietary, asks what role third parties can play, and leaves the question of AMI meters for workshops. Universal Devices asks the Commission to say so expressly as demonstrated in Appendix A.

The change leaves each IOU free to propose a meter-hosted implementation. It also ensures that the advice letters and workshops evaluate implementations on the customer side of the meter. Universal Devices will address architecture in the workshops the Decision directs.

V. CONCLUSION

Universal Devices appreciates the opportunity to provide Opening Comments on the Proposed Decision. Universal Devices requests that the Proposed Decision be adopted but modified for the reasons stated above. The needed modifications to the Proposed Decision are included in Appendix A (Proposed Modifications to Findings of Fact, Conclusion of Law, and Ordering Paragraph) attached and incorporated by reference hereto.

Respectfully submitted,

November 9, 2026

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[4] Proposed Decision, at pp. 120 and 122.

APPENDIX A

UNIVERSAL DEVICES PROPOSED FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDERING PARAGRAPHS FOR THE PROPOSED DECISION ADDRESSING TRACK 3 ISSUES DIRECTING LARGE INVESTOR-OWNED UTILITIES TO SUPPORT AFFORDABILITY THROUGH FLEXIBLE SERVICE CONNECTIONS

Universal Devices proposes the following modifications to the Findings of Fact, Conclusions of Law, and Ordering Paragraphs of the Proposed Decision Addressing Track 3 Issues Directing Large Investor-Owned Utilities to Support Affordability Through Flexible Service Connections ("Proposed Decision"), mailed in R.21-06-017 ("High DER Grid") on October 20, 2026.

Please note the following:

- A page citation to the Revised Proposed Decision is provided in brackets for each Finding of Fact, Conclusion of Law, or Ordering Paragraphs for which a modification is proposed.
- Added language is indicated by **bold type**; removed language is indicated by **bold strike-through**.
- A new or added Finding of Fact, Conclusion of Law, or Ordering Paragraph is labeled as "**NEW**" in **bold,** underscored capital letters.

PROPOSED FINDINGS OF FACT:

NEW. **The definition of Grid Edge DERMs defines functions. It does not require that these functions be performed within utility-owned metering hardware.**

PROPOSED CONCLUSION OF LAW:

NEW. **Grid Edge DERMS functions may be performed by utility-owned metering equipment or by customer-owned or third-party equipment on the customer side of the meter, provided the equipment meets the technology-neutral eligibility criteria and the interoperability and cybersecurity requirements adopted pursuant to this decision.**

PROPOSED ORDERING PARAGRAPHS:

17. [175-176] Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE) and San Diego Gas & Electric Company shall each file a Tier 3 Advice Letter (AL) with their Grid Edge DERMS proposals (Grid Edge DERMS ALs). PG&E shall include a proposal to scale its current ChargeBoost and PanelBoost pilots within 13 months of the issuance of this decision. SCE and SDG&E shall file proposals for scaled implementations of Grid Edge DERMS offerings based on PG&E's ChargeBoost and PanelBoost pilots within 15 months of the issuance of this decision. The Grid Edge DERMS ALs shall include the following:

(a) IOUs shall propose clear, technology neutral criteria for equipment eligibility. IOUs shall describe the solution's architecture and identify which components of the architecture (e.g., metering, communications, control logic) are proprietary and which are built on open standards.

(b) IOUs shall describe what role third parties potentially can play to provide functionally equivalent Grid Edge DERMS services**, including through customer-owned or third-party equipment on the customer side of the meter,** if at a lower cost and with greater implementation efficiencies.

(c) IOUs shall each identify and document the secondary equipment categories and costs that the IOU typically uses for electrifying customers.

(d) IOUs shall each identify the typical equipment categories and costs customers incur when electrifying.

(e) IOUs shall each provide a methodology for identifying, quantifying, tracking and reporting the avoided secondary utility costs resulting from implementation of the Grid Edge DERMs program, the costs of implementing the program and the net ratepayer benefits.

(f) IOUs shall each provide a method of estimating potential costs and savings for prospective customers as part of the program materials for customers. Each IOU shall provide a method for tracking participating customer savings.

(g) IOUs shall each provide an implementation schedule with stage-gates or other milestones that derisk the approach prior to scaling the solution.

(h) IOUs shall propose consistent data reporting across all three IOUs' Grid Edge DERMS pilots.

(i) SCE and SDG&E shall explain any differences from the ChargeBoost and PanelBoost structure.

(j) PG&E shall disclose initial pilot results, reflect stakeholder feedback from the Grid Edge DERMS workshop, propose how it plans to scale Grid Edge DERMS through PanelBoost and ChargeBoost, and discuss whether ChargeBoost and PanelBoost Grid Edge DERMS should become flex connect prioritized for evaluation for residential customers and small commercial customers.