PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Agenda ID #23479

ENERGY DIVISION **RESOLUTION E-5394**

June 12, 2025

R E S O L U T I O N

Resolution E-5394. Pacific Gas and Electric, Southern California Edison, Southern California Gas, and San Diego Gas & Electric Concurrent Application System Phase I Development Contract for Income-Qualified Programs

PROPOSED OUTCOME:

- Approves the joint request of Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), Southern California Gas Company (SoCalGas), and San Diego Gas & Electric Company (SDG&E) for the bid selection and executed contract for the Phase I development of a Concurrent Application System (CAS) for income-qualified electric or gas utility customer assistance programs.
- Approves the joint request of PG&E, SCE, SoCalGas, and SDG&E for the budget for CAS Phase I contract costs.
- Approves the individual requests of PG&E, SCE, and SDG&E for the budget for CAS Phase I administrative costs related to development and implementation through the three-year contract.
- Modifies the individual request of SoCalGas and approves a modified budget for CAS Phase I administrative costs related to development and implementation through the three-year contract.
- Denies the individual request of PG&E, SCE, SoCalGas, and SDG&E for administrative costs related to development and implementation after the three-year contract term.

SAFETY CONSIDERATIONS:

- There are no safety considerations associated with this resolution.

ESTIMATED COST:

- Authorizes $4,051,000 in ratepayer costs shared between PG&E, SCE, SoCalGas, and SDG&E starting Program Year 2025 for the three-year CAS Phase I development contract.
- Authorizes $1,489,483 for PG&E, $1,280,266 for SCE, $3,621,692 for SDG&E, and $2,951,750 for SoCalGas in ratepayer costs for utility-specific administrative costs for CAS Phase I implementation, including recorded costs during Program Years 2023 and 2024 and projected costs through the three-year contract term (noted in Advice Letters as Program Years 2025 - 2027).

By Joint Advice Letters 4994-G/7422-E (PG&E), 5403-E (SCE), 6398-G (SoCalGas), 4543-E/3365-G (SDG&E), filed on November 4, 2024.

SUMMARY

This Resolution approves the Advice Letters (AL) of Pacific Gas and Electric Company (PG&E) AL 4994-G/7422-E, Southern California Edison Company (SCE) AL 5403-E, Southern California Gas Company (SoCalGas) AL 6398-G, and San Diego Gas & Electric Company (SDG&E) AL 4543-E/3365-G (AL 4994-G/7422-E et al.) which request Commission approval for the bid selection and executed contract for development of the Concurrent Application System (CAS) to enable income-qualified customers to apply to multiple electric or gas assistance programs, and the budget for CAS Phase I costs related to CAS development. This AL was filed in compliance with Decision (D.) 23-05-006 regarding the Implementation Process for Creation of a Low-Income Customer Concurrent Application System as Required by Senate Bill (SB) 1208 (2022).

D.23-05-006 directed PG&E to issue a Request for Proposal (RFP) for a CAS developer using recommendations for system design requirements from the Commission's Energy Division and CAS Working Group. PG&E, SCE, SoCalGas, and SDG&E (collectively, the IOUs or joint utilities) were required to file a Tier 3 AL seeking approval for the RFP bid selection and contract execution, in addition to utility-specific development and implementation costs. Energy Division delivered the CAS Phase I system design requirements developed by the CAS Working Group on November 17, 2023 to PG&E, and PG&E issued the RFP on December 29, 2023.

On November 4, 2024, the IOUs filed ALs 4994-G/7422-E et al. requesting approval for the bid selection and executed contract for CAS Phase I. The three-year contract has a proposed budget of $4,051,000 and uses a software-as-a-service agreement to support portal design, development, testing, and launch, and operations and maintenance costs after launch. Additional implementation costs requested in the ALs are administrative costs for each utility respectively.

This Resolution approves AL 4994-G/7422-E et al. per the guidelines and requirements in D.23-05-006. The joint utilities' timing of this request, the use of a Tier 3 AL, the explanation of the RFP process and bid selection, and the amount requested all comply with Commission direction in D.23-05-006. The IOUs have demonstrated that this request for the CAS Phase I development and implementation budget is reasonable and justified due to the executed contract using the Energy Division and CAS Working Group's recommendations for system features and requirements as part of the competitive solicitation process, and the executed contract's adherence to decision and statutory requirements to implement an application process that enables income-qualified customers to concurrently apply to the CARE, FERA, and ESA programs, at a minimum. As such, the IOUs' budget request is approved for the amount of $4,051,000 over three years, with individual IOU budgets set forth herein. The contract term will start upon the Commission's approval of this Resolution. Costs are recorded in IOUs' two-way balancing accounts for CAS development and implementation related to SB 1208. Electric costs may be recovered through Public Purpose Program rates from retail customer classes and gas costs may be recovered through gas transportation rates from all customers.[1]

This Resolution approves individual IOU budgets of $1,489,483 for PG&E, $1,280,266 for SCE, and $2,951,750 for SDG&E, and modifies the budget for SoCalGas to $3,621,692, for utility-specific administrative costs for CAS Phase I implementation. These figures include recorded costs during Program Years 2023 and 2024 and projected costs through the three-year contract term (noted in the ALs as Program Years 2025 - 2027).

This Resolution denies individual IOU budgets for PG&E, SCE, SDG&E, and SoCalGas for projected costs following the approved contract term of three years and during a potential contract extension (noted in the ALs as Program Years 2028 - 2029). IOUs should instead include any additional costs for CAS Phase I following the three-year

[1] Cost recovery methods are detailed in D.23-05-006, Ordering Paragraph 4.

contract term as part of their forecasted budget and revenue requirement in their next CARE, FERA, and ESA program and budget applications, as directed in D.23-05-006.[2]

BACKGROUND

On September 29, 2022, SB 1208 (2022) was chaptered by the Secretary of State, which added Section 731 to the Public Utilities (Pub. Util.) Code and directs that:

> On or before June 30, 2024, the [c]ommission, in coordination and consultation with the Department of Community Services and Development and other relevant state agencies that provide low income electric or gas utility customer assistance programs, shall develop a process that, to the extent possible, enables customers to concurrently apply, or begin to apply, to multiple low income customer assistance programs using data collected during the original application process, including, but not limited to, all of the following programs:
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> A. The California Alternate Rates for Energy program described in Section 739.1;
> B. The Family Electric Rate Assistance program described in Section 739.12; and
> C. The Energy Savings Assistance Program described in Section 2790.

Pub. Util. Code Section 731 also states that the new process shall be known as the Concurrent Application process (elsewhere referred to as the Concurrent Application System, or CAS, the term used in this Resolution) and that it complements, rather than replaces, other application processes. The IOUs must also receive consent from their customers to use already obtained application information to begin the enrollment process for other low-income electric or gas utility customer assistance programs.

On January 26, 2023, an Assigned Commissioner's Ruling Amending Scope and Inviting Comments to Determine Next Steps in Light of Enactment of Senate Bill 1208 (AC Ruling) was issued in the consolidated proceeding for Applications (A.) 19-11-003, 19-11-004, 19-11-005, 19-11-006, and 19-11-007, pertaining to the IOUs' California Alternate Rates for Energy (CARE), Energy Savings Assistance (ESA), and Family Electric Rate Assistance (FERA) programs for program years 2021-2026. The AC Ruling

[2] D.23-05-006, pg. 19.

designated PG&E as the lead IOU and fiscal sponsor in development and implementation of the CAS.[3] PG&E was directed to:[4]

- Issue a Request for Information (RFI) to identify timing and costs for development of the CAS;
- Develop and issue a Request for Proposals (RFP) for development of the CAS, including integration of IOU systems, testing, launch, and maintenance;
- Execute and manage the contract with the CAS platform developer.

On May 19, 2023, the Commission approved D.23-05-006, directing PG&E to issue an RFP for a CAS developer within 42 days after receiving design recommendations from the Commission's Energy Division, but no later than December 29, 2023, and the CAS Working Group and, within 190 days after release of the CAS development RFP, file a Tier 3 Advice Letter seeking approval for the RFP bid selection and contract execution. The decision implements a phased approach to the development of the CAS, where PG&E is the lead IOU for Phase I and describes features that must be included in Phase I of the CAS to meet the requirements of SB 1208.

D.23-05-006 established the CAS Working Group and tasked it with providing design recommendations and advice to PG&E and Energy Division to guide the RFP development, contract negotiation, and system development for Phase I. The RFP and executed contract should adhere to the CAS Working Group's and Energy Division's recommendations. To support the CAS Working Group in developing recommendations, the decision directs PG&E to provide to them all necessary contract information and anonymized results from the RFI, and work collaboratively with the CAS Working Group to develop the scope of the RFP and design of the selected bid. In addition, PG&E was directed to provide ongoing updates to the Energy Division and CAS Working Group and consult with them on the full RFP, full contract with system developer, testing design and execution, and launch strategy.

D.23-05-006 also directed the IOUs to establish two-way balancing accounts to track CAS Phase I development related costs, including those incurred related to the RFI and RFP, testing and development, system integration, maintenance, and the CAS Working Group. The IOUs filed Tier 2 ALs in June 2023 to establish two-way balancing accounts for this purpose and the Commission approved the ALs with an effective date of

[3] AC Ruling, at 4-5.
[4] Ibid.

June 16, 2023.[5] D.23-05-006 stated that IOUs may seek recovery of costs through each IOU's annual rate change implementation advice letter,[6] with common costs recovered using the approved co-funding split.[7]

On July 17, 2024, the IOUs requested an extension of 90 days to submit the Tier 3 AL seeking approval of the executed contract and budget, to ensure that the CAS RFP fully complies with the decision requirements and meets the technical recommendations provided by the CAS Working Group to deliver a solution that will be scalable beyond Phase I.[8] D.23-05-006 directed the IOUs to submit the AL within 220 days after the RFP was released, which occurred on December 29, 2023, making August 5, 2024 the deadline for the AL. The Commission granted the extension to allow IOUs to file the AL by November 3, 2024.[9]

NOTICE

Notice of AL 4994-G/7422-E et al. was made by publication in the Commission's Daily Calendar. PG&E, SCE, SoCalGas, and SDG&E state that a copy of the Advice Letter was mailed and distributed in accordance with Section 4 of General Order 96-B.

PROTESTS

Advice Letters 4994-G/7422-E et al. were not protested.

DISCUSSION

The Commission has reviewed AL 4994-G/7422-E et al. and finds the CAS RFP process and contract selection is reasonable. The IOUs explain that the RFP was built on the

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[5] PG&E AL 4764-G/6964-E, SCE AL 5053-E, SoCalGas AL 6151-G, and SDG&E AL 4236-E/3201-G

[6] D.23-05-006, pg. 18. The IOUs' January 1st rate change implementation advice letters have different names for the different IOUs - PG&E's is the "Annual Electric True Up." SCE's is the "Consolidated Revenue Requirement and Rate Change," while SDG&E has two that get filed late in the year, one called the "Annual Electric Regulatory Account Update" which then gets rolled into the "Consolidated Filing to Implement January 1, 202X, Electric Rates."

[7] D.23-05-006, Ordering Paragraph 4

[8] D.23-05-006, Ordering Paragraph 2

[9] Letter from CPUC Executive Director Rachel Peterson to PG&E Regulatory Relations Director Sidney Bob Dietz II, July 26, 2024. Subject: Request for Extension of Time Under Commission Rule 16.6 to Comply with Ordering Paragraph 2 of Decision 23-05-006

information received from the RFI, the preliminary design requirements, and list of electric and gas assistance programs as recommended by the CAS Working Group and approved by Energy Division. All IOUs, in addition to CPUC staff, participated in the bid selection process and worked with the RFP evaluation team to score proposals, identify a shortlist of bidders to interview, and select the top bid. After the evaluation team selected DNV Energy Services USA Inc. (DNV), the CPUC conducted a conflict of interest screening in compliance with D.23-05-006.[10]

The IOUs also explain that during contract negotiations, PG&E regularly met with CPUC staff to provide updates and ensure the final contract and Scope of Work met the requirements of the decision and SB 1208, were consistent with the design requirements as recommended by the CAS Working Group, and provide sufficient flexibility and scalability of the platform in preparation for CAS Phase II, which may look to expand the programs offerings in CAS.[11]

We find the IOUs' explanation of engagement with the CPUC staff and CAS Working Group through the RFP process is also reasonable. The IOUs explain that PG&E worked closely with the CAS Working Group to develop the scope of the RFP and design of the selected bid, including providing necessary information and updates about the RFP process, contract negotiation, and results from the RFI, and incorporated feedback from the CAS Working Group and CPUC staff and Information Technology Services Division staff on the selected proposal before contract negotiations.

We find that the contract between the consultant, DNV, and PG&E as contained in Appendix A is reasonable. The IOUs explain that the contract includes all the features required by the decision for Phase I,[12] in order to meet the requirements of SB 1208 and leveraging the Universal Application System Report's[13] findings:

[10] D.23-05-006, Ordering Paragraph 1.

[11] D.23-05-006 outlined a phased approach to the development of the CAS, with Phase I focused on implementation of the requirements of SB 1208, while Phase II will address the expansion of the CAS beyond the initial CARE, FERA, and ESA programs to other potential offerings. D.23-05-006, pg. 9, 11, 12.

[12] D.23-05-006, page 12.

[13] The IOUs were directed in the ESA, CARE, and FERA program applications decision for Program Years 2021-2026 (D.21-06-015) to set up a stakeholder working group to develop recommendations for a Universal Application System (UAS) by which the CARE, ESA, and FERA programs could be integrated into a single statewide application process. The UAS Working Group completed a report on July 1, 2022 with recommendations for design, user experience, and requirements for the application platform.

- The CAS will recommend programs the customers may be eligible for after gathering eligibility information from the user;
- CAS users will be able to concurrently apply, or begin to apply for, the CARE, ESA, and FERA programs through a single platform;
- The CAS will transmit customer information to program administrators to facilitate the enrollment of customers in other eligible programs;
- The CAS will be accessible to all types of users, including supporting Web Content Accessibility Guidelines, or equivalent, and available in multiple languages; and
- The CAS will allow customers to provide consent to share personal information, and the platform shall follow data privacy and security rules.

The IOUs state that the contract scope adheres to recommendations from the CAS Working Group and the Energy Division regarding the design, customer programs, and features of CAS, including ability for the CAS to recommend relevant programs to customers, enable customers to concurrently apply to programs or provide information on how to apply, gather customer consent, provide resources for households in crisis, and support multiple user types, such as Community Based Organizations that can assist customers in applying to programs through CAS and track applications to receive capitation payments from applicable programs. The proposed CAS system will also utilize a configurable integration framework to enable flexibility and scalability to other energy and non-energy utility programs and systems in the future.[14]

The decision states that the IOUs should be prepared to integrate their existing ESA, CARE, and FERA enrollment systems to allow for integration with the CAS and establish agreements with the CAS developer, including data sharing agreements, within 90 days after contract execution. The IOUs explain that the CAS will support integration with utility systems through Application Programming Interface (API) and secure file transfer protocol (eFTP). Integration of each income-qualified energy program with the CAS is considered a utility-specific cost and is expected to be recorded in the IOUs' respective balancing accounts.[15]

We find the proposed budget for the CAS Phase 1 contract of $4,051,000 for technology services over three years is reasonable. This estimate is also consistent and within range

[14] Detailed scope of CAS Phase I contract is provided in AL 4994-G/7422-E et al. pages 13 – 15 and Confidential Appendix A: CAS Phase I Contract

[15] D.23-05-006, page 17.

of the information received through the RFI that PG&E released in March 2023.[16] PG&E expects the CAS portal to launch during Year 2 of the contract (projected late 2026), leaving more than a year for operations, maintenance, and tracking results of the portal through the three-year contract term.[17] PG&E notes that there are two optional one-year agreements for maintenance and operations of the CAS platform, which could extend the contract to Years 4 and 5, if PG&E proposes to extend the contract.

Each utility provided proposed budgets for IOU-specific costs during Phase I (Table 1). These costs are recorded separately from the IOUs' shared costs for the development contract, and encompass administration costs such as supporting and engaging with the CAS Working Group, compliance, utility systems integration with CAS, RFP review and scoring, and contract administration.[18] All IOUs state that projected costs during contract Year 1 to Year 2 are greater than Year 3 costs due to higher staff engagement during the discovery, development, and testing phases before launch and more complex systems integration work; Year 3 reflects ongoing contract management and system refinement and maintenance costs.

Table 1: Requested Budget for Utility-Specific Costs Related to CAS Phase I Development

	2023 [1]	2024 [1]	Year 1 (2025) [2]	Year 2 (2026) [2]	Year 3 (2027) [2]	Year 4 (2028) [3]	Year 5 (2029) [3]
PG&E	$44,183	$130,300	$510,000	$530,000	$275,000	$190,000	$197,000
SCE	$28,701	$67,565	$459,000	$477,000	$248,000	$171,000	$178,000
SDG&E	$0	$84,692	$2,142,000	$914,000	$481,000	$311,000	$249,000
SoCalGas	$0	$30,000	$1,771,000	$947,000	$650,000	$500,000	$500,000

[1] 2023 includes recorded costs and 2024 includes both recorded and projected costs at the time of AL submission.
[2] Year 1 – 3 refer to the contract years, which is expected to start mid-2025 after the Commission approves this Resolution.
[3] Year 4 – 5 are projected costs for an optional year contract extension up to two years.

[16] AC Ruling, at 4-5.
[17] AL 4994-G/7422-E et al. uses both calendar years and contract years to describe Phase I costs, such as contract Year 1 (2025), Year 2 (2026), Year 3 (2027), etc. This resolution refers to Years 1 – 3 of the contract term instead of calendar years since the contract will begin mid-year in 2025.
[18] D.23-05-006, pg. 17-18.

We find the utility-specific costs for PG&E, SCE, and SDG&E recorded from 2023 and projected through the three-year contract term related to Phase I development are reasonable. SDG&E confirmed that projected costs for contract Years 1and 2 are comparatively high to other years due to complex integration work to support API calls required for CAS implementation, including billing system enhancements and ten new interfaces.[19]

We find the utility-specific costs for SoCalGas recorded from 2023 and projected costs ($0 in 2023, $30,000 in 2024, and $947,000 in Year 1(2025)) through Year 1 of the contract related to Phase I development are reasonable. SoCalGas confirmed there are two system replacements currently in development, funded separately from CAS, for its Customer Information System (CIS) to support customer service business and billing processes and subsystems which support the front end of the CARE and ESA Programs. These systems will integrate with the CAS platform when in service, but SoCalGas confirmed there are challenges in projecting specific cost details for CAS integration since these systems are not yet in service and better costs estimates are difficult to accurately estimate until the vendor moves forward with development and as requirements are further defined.[20]

We find SoCalGas' projected costs ($947,000 in Year 2 and $650,000 in Year 3) after the launch of the platform in Year 2, during operations and maintenance, to be higher than needed in contract Years 2 and 3 and approve a modified, smaller budget to cover cloud services costs. SoCalGas confirmed that ongoing costs after the CAS platform launches (estimated to take 18 months after the Commission approves this Resolution) include costs to support operations and maintenance, including administration costs and fixed costs for cloud services as it relates to their upcoming system replacements.[21] Only costs that are incremental to charges above the normalized costs of operations for those systems, before adding on the CAS interfaces and modules, should be recorded in the CAS Balancing Account. SoCalGas' requested budget for Years 2 and 3 are reduced by 85% of estimated fixed costs for cloud services (which assumed a new contract for cloud services), for a $446,250 difference between requested and authorized budgets over two years. It is more cost efficient for SoCalGas to include incremental costs and work related to cloud services within the existing scope of SoCalGas' systems replacements that are currently in development, rather than creating a new contract to cover cloud

[19] SDG&E response to Energy Division Staff data request submitted on January 15, 2025, Question 1.
[20] SoCalGas response to Energy Division Staff data request submitted on January 15, 2025, Question 2.
[21] SoCalGas response to Energy Division Staff data request submitted on February 11, 2025, Question 1. Attached in Appendix A

services for CAS purposes separately. It is reasonable for ongoing costs for operations and maintenance to be adopted at the following levels (Table 2).

Table 2: Approved Budget for Utility-Specific Costs Related to CAS Phase I Development

	2023 [1]	2024 [1]	Year 1 (2025) [2]	Year 2 (2026) [2]	Year 3 (2027) [2]	Total
PG&E	$44,183	$130,300	$510,000	$530,000	$275,000	$1,489,483
SCE	$28,701	$67,565	$459,000	$477,000	$248,000	$1,280,266
SDG&E	$0	$84,692	$2,142,000	$914,000	$481,000	$3,621,692
SoCalGas	$0	$30,000	$1,771,000	$798,250	$352,500	$2,951,750

[1] 2023 includes recorded costs and 2024 includes both recorded and projected costs at the time of AL submission.
[2] Year 1 – 3 refer to the contract years, which is expected to start mid-2025 after the Commission approves this Resolution.

We note that the individual costs projected by SDG&E and SoCalGas during the three-year contract term to be much higher than the other IOUs but recognize there are limitations in estimating costs for integration with CAS when the IOU systems are undergoing replacement or require enhancements before integrating with CAS, and when detailed CAS requirements for integration are not yet developed.

We deny the individual costs requested by IOUs in Years 4 and 5, associated with a potential contract extension for operations and maintenance, due to the uncertainty of whether PG&E will exercise the optional two-year agreement and contract extension at this time. IOUs should include forecasted costs for CAS Phase I Years 4 and 5, if any, following the three-year contract term, as part of their forecasted budget and revenue requirement in their next CARE, FERA, and ESA program and budget applications "for future CAS costs beyond Phase I launch (such as for ongoing maintenance)," as directed in D.23-05-006.[22] If further revenue is requested for CAS Phase I, the request must be supported with information showing the IOUs' actual recorded versus projected costs for 2024-2027.

[22] D.23-05-006, pg. 19.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this Resolution must be served on all parties and subject to at least 30 days public review. Any comments are due within 20 days of the date of its mailing and publication on the Commission's website and in accordance with any instructions accompanying the notice. Section 311(g)(2) provides that this 30-day review period and 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day review and 20-day comment period for the draft of this Resolution was neither waived nor reduced. Accordingly, this draft Resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

FINDINGS AND CONCLUSIONS

1. Decision (D.) 23-05-006 directed Pacific Gas and Electric Company to release a Request for Proposals (RFP) for Concurrent Application System (CAS) Phase I after receiving finalized RFP recommendations from the Commission's Energy Division and the CAS Working Group, but no later than December 29, 2023.
2. D.23-05-006 stated that no contract may be awarded without the bidder clearing a Commission-conducted conflict of interest screen.
3. D.23-05-006 directed Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), Southern California Gas Company (SoCalGas), and San Diego Gas & Electric Company (SDG&E) (collectively, the "IOUs") to file a Tier 3 Advice Letter seeking approval for the bid selection, executed contract, and budget for the development of CAS Phase I.
4. D.23-05-006 authorized IOUs to record CAS Phase I development related costs in their CAS two-way balancing accounts.
5. D.23-05-006 directed IOUs to seek recovery for CAS Phase I development costs through the IOUs' annual rate change implementation advice letters after review and approval of this Resolution.
6. D.23-05-006 authorized IOUs to recover electric costs through Public Purpose Program rates from retail customer classes and gas costs to be recovered through transportation rates from all customers.
7. The CAS Working Group delivered recommendations to the Commission's Energy Division and PG&E, as the lead utility and fiscal sponsor, regarding the implementation, design and development of the CAS.

8. PG&E released the RFP for CAS Phase I on December 29, 2023 using the final recommendations from the Commission's Energy Division and the CAS Working Group.
9. The selected bidder, DNV Energy Services USA Inc., cleared a Commission-conducted conflict of interest screen.
10. The IOUs filed Tier 3 Advice Letters (AL) of PG&E AL 4994-G/7422-E, SCE AL 5403-E, SoCalGas AL 6398-G, and SDG&E AL 4543-E/3365-G on November 4, 2024 requesting Commission approval for the bid selection, executed contract, and budget for CAS Phase I.
11. It is reasonable to modify SoCalGas' requested budget for Years 2 and 3 of the developer contract, after launch of the CAS platform, for ongoing costs for cloud services if incremental costs and work related to cloud services are included within the existing scope of SoCalGas' systems replacements currently in development.
12. It is reasonable for Energy Division staff to apply additional scrutiny when the IOUs seek cost recovery during the annual rate change implementation advice letters for reasonableness review to ensure adequate Commission oversight.
13. If the IOUs decide to pursue an extension of the CAS Phase I developer contract, it is reasonable for PG&E, SCE, SoCalGas, and SDG&E to include individual forecasted costs for Years 4 and 5 in their next CARE, FERA, and ESA program and budget applications, using supporting information showing actual recorded costs versus projected costs for 2024-2027, as part of their forecasted budget and revenue requirement for future CAS costs beyond Phase I launch.

THEREFORE IT IS ORDERED THAT:

1. The request to approve the bid selection and executed contract for the Phase I development of a Concurrent Application System as requested in Advice Letters of Pacific Gas and Electric (PG&E) AL 4994-G/7422-E, Southern California Edison (SCE) AL 5403-E, Southern California Gas (SoCalGas) AL 6398-G, and San Diego Gas & Electric (SDG&E) AL 4543-E/3365-G (4994-G/7422-E et al.) is approved.
2. The request to approve the development budget for CAS Phase I of $4,051,000 from 2025 to 2027, shared by the IOUs, as requested in AL 4994-G/7422-E et al. is approved.
3. The request for utility-specific administrative budgets for CAS Phase I implementation for $1,489,483 for PG&E, $1,280,266 for SCE, and $3,621,692 for SDG&E, as requested in AL 4994-G/7422-E et al. is approved.

4. The request for utility-specific administrative budgets for CAS Phase I implementation for SoCalGas, as requested in AL 4994-G/7422-E et al. is modified from $3,398,000 to $2,951,750 and approved.
5. PG&E, SCE, SoCalGas, and SDG&E shall include forecasted costs for Years 4 and 5, using supporting information showing actual recorded costs versus projected costs for 2024-2027, if the IOUs decide to pursue an extension to the CAS Phase I developer contract, in their next CARE, FERA, and ESA program and budget applications, as part of their forecasted budget and revenue requirement for future CAS costs beyond Phase I launch.

This Resolution is effective today.

Commissioner Signature blocks to be added
upon adoption of the resolution

The foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on June 12, 2025; the following Commissioners voting favorably thereon:

Dated ______________________________, at <Voting meeting location>, California

APPENDIX A

Appendix A

Data request from CPUC Energy Division to SoCalGas, sent February 11, 2025

Question 1:
"Please provide a cost breakdown of General Administration and IT Systems Support for Years 2027 – 2029 and further itemize costs within each of these two categories. See attached to use as a template.
Also in your response, please confirm if:

- There are any cloud subscription costs that would be recorded to the CAS balancing account vs if those are funded separately with the two system replacements underway.
- Projected costs include estimates for design enhancements during a potential contract extension period, beyond the standard O&M costs that would occur for a contract extension. If so, indicate this as an assumption in Column F."

Excerpt from SoCalGas response to Energy Division Staff's data request submitted February 14, 2025 in response to Question 1

Year	Cost Categories	Description	Projected Cost	Assumption(s)
2027	IT Systems Support	projected fee to vendor for maintenance	$350,000	Projected cost to 3rd party vendor for full system specifications
2028	IT Systems Support	projected fee to vendor for maintenance	$350,000	Projected cost to 3rd party vendor for full system specifications
2029	IT Systems Support	projected fee to vendor for maintenance	$350,000	Projected cost to 3rd party vendor for full system specifications

"SoCalGas provided cost estimates within the cost category "Implementation" which include an anticipated fixed cost for cloud services, these costs will be recorded to the CASBA."

END OF APPENDIX A