ALJ/MPO/cg7 **Date of issuance 12/05/2025**

Decision 25-12-005 December 4, 2025

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Transportation Electrification Policy and Infrastructure.	Rulemaking 23-12-008

DECISION ADOPTING REVISED DATA GATHERING AND REPORTING REQUIREMENTS FOR TRANSPORTATION ELECTRIFICATION PROGRAMS AND PROVIDING CLARIFICATION ON PROGRAMS ADOPTED IN DECISION 22-11-040

Summary

This decision adopts revised transportation electrification data gathering and reporting requirements. This decision also continues the implementation of the Technical Assistance Program with a budget of $36 million over three years and delinks this program from the Funding Cycle One Behind-the-Meter Rebate Program. Lastly, this decision provides clarification regarding other programs approved in Decision 22-11-040 and the Funding Cycle Zero deadline. The Funding Cycle One Behind-the-Meter Rebate Program remains paused.

This proceeding remains open.

1. Background

Rulemaking (R.) 18-12-006 was initiated to further the Commission's implementation and administration of transportation electrification (TE) programs, tariffs, and policies for California. As part of this effort, the

Commission issued Decision (D.) 22-11-040, which adopted a long-term TE polic framework that included a charge on electricity bills for a five-year, third-party administered statewide transportation electrification infrastructure rebate program. The Funding Cycle One Behind-the-Meter (FC1 BTM) Rebate Program adopted in D.22-11-040 consists of $600 million over the first three years, and a total of $1 billion over five years. The Technical Assistance (TA) Program was allocated six percent of the utilized portion of the adopted FC1 BTM Rebate Program budget of $600 million, or $36 million, whichever is lower. D.22-11-040 also adopted data gathering and reporting requirements for TE program that built upon previously adopted requirements.

The Commission issued a new Order Instituting Rulemaking regarding TE policy and infrastructure on December 20, 2023. On December 27, 2023, the Commission issued a ruling seeking comment from interested parties on the Data Assessment Analysis submitted by the investor-owned utilities. The Public Advocates Office at the California Public Utilities Commission (Cal Advocates), the California Large Energy Consumers Association (CLECA) and the Joint Community Choice Aggregators (Joint CCAs),[1] filed opening comments on the analysis on February 2, 2024. Pacific Gas and Electric (PG&E), San Diego Gas & Electric (SDG&E), Small Business Utility Advocates (SBUA), Southern California Edison Company (SCE) and the Vehicle-Grid Integration Council (VGIC) filed

[1] The Joint Community Choice Aggregators are: Ava Community Energy, the City of San José – which operates and administers San José Clean Energy through the City's Community Energy Department, Clean Power Alliance of Southern California, Marin Clean Energy, Peninsula Clean Energy Authority, San Diego Community Power, and Sonoma Clean Power Authority.

reply comments on February 16, 2024.[2]

On April 12, 2024, a scoping memo was issued that established the issues within the scope of R.23-12-008.

A ruling issued on June 3, 2024 established Track 1 of the rulemaking to consider any issues related to D.22-11-040 (June 3 Ruling). The June 3 Ruling determined that implementation of the FC1 BTM Rebate and LITE programs would be paused pending the completion of the assessment. The June 3 Ruling sought, in part, comment as to whether a pause of these programs required any clarification regarding the directions, approved budgets, or other aspects of the implementation of D.22-11-040. The June 3 Ruling also indicated that other programs approved in D.22-11-040, such as the TA Program and Data Assessment, would not be reassessed.

On July 2, 2024, the following parties filed opening comments in response to the ruling: Acterra: Action for a Healthy Planet (Acterra), Advanced Energy United (United), Association of Bay Area Governments and the County of Ventura (County of Ventura),[3] the California Association of Small and Multi-Jurisdictional Utilities (CASMU)[4], CLECA, CALSTART, Inc. (CALSTART), the Center for Accessible Technology (CforAT), the Center for Sustainable Energy (CSE), ChargePoint, Inc. (ChargePoint), Clean Energy, the Clean Coalition, the

[2] PG&E, SCE, SDG&E filed joint comments.

[3] Joint comments of Association of Bay Area Governments on behalf of the Bay Area Regional Energy Network program (BayREN) and the County of Ventura on behalf of the Tri-County Regional Energy Network program (3C-REN).

[4] CASMU consists of Bear Valley Electric Service, Inc. (BVES), Liberty Utilities (CalPeco Electric) LLC (Liberty), and PacifiCorp d/b/a Pacific Power (PacifiCorp).

County of Los Angeles, the Green Power Institute (GPI), GRID Alternatives (GRID), the Joint CCAs, the Joint Commenters,[5] the Natural Resources (NRDC) and Environmental Defense Fund (EDF),[6] PG&E, PearlX Infrastructure LLC (PearlX), PowerFlex Inc. (PowerFlex), Powering America's Commercial Transportation (PACT), Cal Advocates, SDG&E, SBUA, SCE, the Utility Reform Network (TURN), Utility Consumers' Action Network (UCAN), VGIC, Voltera Power LLC (Voltera) and Vote Solar.

On July 18, 2024, the following parties filed reply comments: Acterra, County of Ventura, CLECA, CALSTART, CSE, ChargePoint, the Clean Coalition, EV Realty, Ford Motor Company (Ford), GPI, GRID, the Joint CCAs, PG&E, PearlX, PACT, Pilot Travel Centers LLC (PTC), Cal Advocates, SDG&E, SBUA, SCE, TURN, UCAN, VGIC, Voltera and Weave Grid, Inc. (Weave Grid).

2. Issues Before the Commission

The issues before the Commission are:

1. Whether to revise TE data gathering and reporting requirements; and
2. Whether a pause of the FC1 BTM Rebate and LITE programs requires any clarifications regarding the directions, approved budgets, or other aspects of the implementation of D.22-11-040.

---

[5] The Joint Commenters consist of East Yard Communities for Environmental Justice, Sierra Club, and the Union of Concerned Scientists.

[6] NRDC and EDF filed joint comments.

3. Discussion

3.1. Data Gathering and Reporting Requirements

D.22-11-040 adopted a data gathering and reporting structure intended to capture all investor-owned utility (IOU) TE data, including an inventory of all TE data that the IOUs are required to report. The objective of the data gathering and reporting structure was to streamline existing reporting requirements, minimize unnecessary or duplicative reports, and inform FC1 reporting requirements since various decisions and rulings have required some form of data gathering and reporting for TE issues.

On July 31, 2023, the Bear Valley Electric Service Inc., Liberty Utilities (CalPeco Electric) LLC, and PacifiCorp d/b/a Pacific Power, PG&E, SDG&E, SCE, (collectively, "the Joint IOUs") submitted a draft joint Data Assessment Analysis to Energy Division. On November 22, 2023, after initial feedback, the Joint IOUs updated their analysis and submitted a revised draft to Energy Division. On December 27, 2023, the Commission issued a ruling seeking comment from interested parties on the Data Assessment Analysis. Cal Advocates, CLECA and the Joint CCAs filed opening comments on February 2, 2024. PG&E, SCE, SDG&E, SBUA and VGIC filed reply comments on February 16, 2024.[7] We address the recommendations for changes to the TE data gathering and reporting structure below.

[7] PG&E, SCE, SDG&E filed joint reply comments.

3.1.1. Annual TE Programs and Initiatives Compliance Report

Several decisions and rulings have required some form of data gathering and reporting for TE issues.[8] The Joint IOU Data Assessment Analysis recommends consolidation of the SB 350 Report, VGI Report, and other IOU-specific program reporting into a single, comprehensive Annual TE Programs and Initiatives Compliance Report that would be due yearly on June 30th.[9] The Joint IOUs assert that utilizing one consolidated, comprehensive report will eliminate unnecessary and overlapping requirements, while ensuring that reporting meets the Commission's goals with maximum efficiency.[10] In line with the comprehensive yearly report, the Joint IOUs also request changing the reporting cadence for IOU programs[11] to once per year to align with other SB 350 TE program reporting cadences. Cal Advocates supports the IOUs' streamlining and consolidation proposal.[12] No party opposed the IOU's proposal.

We find the consolidation proposal is reasonable. It will streamline and increase the efficiency of data reporting for TE. We find that the comprehensive Annual TE Programs and Initiatives Compliance Report should consolidate: (1) SB 350 Report, (2) VGI Report, (3) EV Cost and Load Report and (4) elements of

[8] D.18-01-024, D.19-11-017, D.18-05-040, D.19-08-026, D.21-04-014, D.20-08-045.

[9] Ruling Requesting Comment on the Joint IOU Data Assessment Analysis, Attachment 2 at 1.

[10] *Ibid*.

[11] D.21-04-014 (SDG&E's Power Your Drive Extension); D.20-08-045 (SCE's Charge Ready 2).

[12] Cal Advocates Comments on the Joint IOU Data Assessment Analysis at 2.

the quarterly Energy Division data request.[13] This comprehensive report will replace all previous TE data reports. For the first year of implementation, the report will be due on September 30, 2026 to allow for sufficient time to finalize and implement these reporting changes. For 2027 and subsequent years, the report will be due on June 30th. This reflects a change of the reporting cadence for the IOU programs[14] to once per year. The reporting period shall address the prior calendar year from January 1- December 31. The IOUs shall file and serve a public version of the Annual TE Programs and Initiatives Compliance Report to the service list of this proceeding and any future successor proceeding on transportation electrification.

We direct Energy Division staff to work with the IOUs to finalize a template for the comprehensive Annual TE Programs and Initiatives Compliance Report that will be posted on the Commission's website and served to the service list upon completion. The IOUs must receive staff approval by May 30th for the Annual TE Programs and Initiatives Compliance Report. If changes to the template are needed in the future, Energy Division will consult with the IOUs and stakeholders and notify the service list of any changes before updating the template. During the template finalization process, we direct the Small and Multi-Jurisdictional Utilities to work with Energy Division staff to identify which fields in the reporting template are relevant for their reporting, recognizing that

[13] SB 350 Report include D.21-04-014 at Section 8 (SDG&E's Power Your Drive Extension); D.20-08-045 at 124 (SCE's Charge Ready 2).

[14] D.21-04-014 (SDG&E's Power Your Drive Extension); D.20-08-045 (SCE's Charge Ready 2).

they are not required to file the SB 350 Report, the VGI Report, and the EV Cost and Load report.

Additionally, during the process of template finalization, Energy Division staff and IOU staff, in consultation with stakeholders, shall consider whether data points that are reported in the Biannual Energization Report and the Load and Cost Report can be removed from the Annual TE Programs and Initiatives Compliance Report template. This process shall seek to minimize duplicative approaches to tracking the same data points, but there may be a need for data points to be reported in both proceedings.

Energy Division shall provide 120 days advanced notice prior to the reporting deadline for any future changes adopted for the template.

3.1.2. VGI

The Joint IOU Data Assessment Analysis also proposes several changes to VGI reporting, including: (1) reducing VGI Report submittal to once per year; (2) eliminating the stocktake requirement and (3) revising the VGI Report template.

First, the Joint IOU Data Assessment Analysis recommends reducing the VGI Report to once a year. No party opposes this change. We find it is reasonable to reduce the frequency of the VGI Report to once a year as it will streamline and increase the efficiency of the reporting process. The IOUs shall submit the VGI Report as part of the Annual TE Programs and Initiatives Compliance Report on June 30th.

Second, the IOU Data Assessment Analysis recommends the elimination of the stocktake requirement from the VGI Report. D.20-12-029 directed SCE, SDG&E, and PG&E to provide a joint annual stocktake of actions outside of those ordered by that decision that will facilitate VGI strategies.[15] The annual stocktake report addresses actions under the jurisdiction of the Commission as well as actions by other agencies and organizations that would help realize the VGI strategy adopted by D.20-12-029.

The Joint IOUs state that the original intent of the stocktake requirement was to provide the Commission and stakeholders with an understanding of the current breadth of TE programs to maximize the administrative efficiency of any new programs. They assert that due to the rapid expansion of TE and VGI related efforts nationwide, the ability of the stocktake to provide its intended intent is diminished. The Joint IOUs indicate that the stocktake requirement should be eliminated since other third parties are better positioned to conduct the stocktake, if necessary.[16]

CLECA contends that the Commission should preserve the stocktake and expand the stocktaking reporting requirements to include an annual stocktake addressing affordability concerns.[17] They argue that the rapid expansion of VGI efforts and the persistent affordability issues support the preservation of the stocktake.[18] In response to CLECA's comments, the IOUs argue that expanding

[15] D.20-12-029, Ordering Paragraph 2.

[16] Ruling Requesting Comment on the Joint IOU Data Assessment Analysis, Attachment 2 at 2.

[17] CLECA Comments on the Joint IOU Data Assessment Analysis at 3.

[18] *Id.* at 4.

the VGI stocktake report is not the most efficient approach to evaluate affordability and that existing reporting will serve as more effective sources.[19]

VGIC also opposes eliminating the stocktake requirement, contending that it helps to ensure utility pilots are not duplicative of existing pilots or that re-piloting of proven technology occurs.[20] VGIC asserts that the stocktake serves as a "repository of information that can reveal gaps in programs or pilots, thereby providing a key input into the ideation of new VGI programs, rates, pilots, or related initiatives."[21]

We agree that given the rapid expansion of TE and VGI related efforts nationwide, there are third parties that are better suited to conduct the stocktake report in the future. An expanded stocktake is not necessary to ensure the appropriate authorization of additional ratepayer dollars, and stakeholders can utilize the TE Compliance and Initiatives Report to evaluate affordability moving forward. Therefore, we find that the annual VGI stocktake requirement should be eliminated. If it becomes necessary in the future, the Commission can revisit the need for a stocktake and the appropriate methodology.

Third, the Joint IOU Data Assessment Analysis recommends changes to the reporting requirements for VGI. D.20-12-029 directed the Joint IOUs to report on numerous categories of VGI activities.[22] The Joint IOUs assert that the

---

[19] PG&E, SDG&E and SCE Joint Reply Comments on the Joint IOU Data Assessment Analysis at 4.

[20] VGIC Reply Comments on the Joint IOU Data Assessment Analysis at 3.

[21] *Ibid*.

[22] D.20-12-029 at Ordering Paragraph 1.

current reporting requirements are redundant and request information that is unnecessary. They contend that the VGI reporting structure should move away from numerous detailed questions towards fewer, broader questions.[23] VGIC opposes this change, arguing that the Joint IOUs "offer no justification for why their reporting should move away from numerous, detailed questions toward fewer, broader questions."[24] VGIC recommends that the IOUs should indicate the specific questions that should be retained, modified, or eliminated, and allow parties to respond.

We find that it is appropriate to revisit the reporting requirements for VGI. However, we do not have sufficient details to make any determination in this decision. We direct Energy Division to work with the IOUs and stakeholders to determine what questions in VGI reporting remain relevant. This consultation should occur as part of the upcoming annual VGI Forum ordered in D.22-11-040. In order to provide sufficient time for this consultation, we move the VGI Forum to the first quarter (Q1) of 2026. Subsequent annual VGI Forums shall also occur in Q1 of each year. Any changed VGI reporting requirement shall be reflected in the TE Compliance and Initiatives Report template.

Reporting requirements established for CCAs by D.20-12-029 are waived until the new data template has been developed.[25] During the process of developing the template, the CCAs shall coordinate with Energy Division to

---

[23] Ruling Requesting Comment on the Joint IOU Data Assessment Analysis, Attachment 2 at 2.

[24] VGIC Reply Comments on the Joint IOU Data Assessment Analysis at 2.

[25] D.20-12-029, OP 20.

suggest any modifications needed to the template. Small CCAs, defined as serving less than 700 gigawatt-hours (GWh) of annual electrical demand, shall be exempt from any reporting requirements other than activity-based metrics.

3.1.3. The EV Cost and Load Report Filing Requirement

D.11-07-029 ordered PG&E, SCE and SDG&E complete specific EV load research and file the results in an annual EV Cost and Load Research Report.[26] The Commission has extended this requirement several times.[27] The Joint IOUs Data Assessment Analysis recommends eliminating the requirement to file the EV Cost and Load Report with the docket office and instead submit it as a compliance report to Energy Division and serve on the service list.[28] No Party opposes this recommendation.

We find that the proposal to eliminate the filing requirement for the EV Cost and Load Report is reasonable. The contents of the EV Cost and Load Report shall be consolidated into the Annual TE Programs and Initiatives Report and submitted as a compliance report to Energy Division at energydivisioncentralfiles@cpuc.ca.gov and served on the service list of this proceeding.

---

[26] D.11-07-029 at Ordering Paragraphs 6 and 7.

[27] D.11-07-029 at Ordering Paragraph 7; D.13-06-014 at Ordering Paragraph 7; D.16-06-011 at Ordering Paragraph 4, R.18-12-006 (Scoping Memo and Ruling at Ordering Paragraph 9; January 6, 2020 ALJ Ruling).

[28] Ruling Requesting Comment on the Joint IOUs Data Assessment Analysis, Attachment 2 at 2.

3.1.4. Other Data Gathering and Reporting Requests

Cal Advocates commented that a IOU public presentation should accompany the submission of the IOUs' proposed Annual TE Programs and Initiatives Compliance Report.[29] The IOUs state that this presentation should be included in the Annual Roundtable and existing Program Advisory Council (PAC) meetings.[30] We find it is appropriate to incorporate a presentation on the Annual TE Programs and Initiatives Report into the existing PAC meetings. We also direct the IOUs to email the PAC slides to the service list and post them on their respective websites.

Cal Advocates also recommends that the Commission require that: (1) all IOUs send a public version of their TE quarterly reports to the service lists in all Commission TE proceedings and (2) the TE quarterly reports include additional specified columns.[31] The Joint IOUs agree with serving a public version on TE service lists, but oppose the addition of columns, arguing that this request is beyond the scope and purpose of the Data Assessment Analysis.[32] We find the recommendation for service of a public version of the TE quarterly reports is reasonable and order the IOUs to do so moving forward. We decline to require the addition of columns to the TE quarterly reports at this time. However, we

---

[29] Cal Advocates Comments on the Joint IOUs Data Assessment Analysis at 4.

[30] PG&E, SDG&E and SCE Joint Reply Comments on the Joint IOUs' Data Assessment Analysis at 3.

[31] Cal Advocates Comments on the Joint IOU Data Assessment Analysis at 4.

[32] Joint PG&E, SDG&E and SCE Reply Comments on the Joint IOU Data Assessment Analysis at 2.

direct Energy Division to work with Cal Advocates and other stakeholders to incorporate relevant program information into the TE Compliance and Initiatives Report template. The quarterly reports shall continue to be required for the IOUs through the end of active program enrollment, Q4 2026. As this reporting constitutes a standing data request, Energy Division staff may request this information in later years if needed.

3.2. Technical Assistance Program

Several parties submitted comments on clarifications regarding the Technical Assistance (TA) Program. CASMU, PG&E, SDG&E and SCE indicated that the Commission should set a TA Program statewide budget at $36 million and clarify that the TA Program is separate from the FC1 BTM Rebate Program by removing requirements that link the two programs.[33] PG&E and SCE also recommended that the Commission decouple the TA Rulebook from the FC1 Program Handbook so that the IOUs can submit the draft TA Rulebook and Workshop Report as standalone items.[34]

CALSTART and CSE recommend reallocation of the TA Program budget for other purposes, including energization barriers.[35] SDG&E and SCE assert that the Commission reject these reallocation proposals, arguing that D.22-11-040

[33] CASMU Opening Comments on the June 3 Ruling at 11-12; PG&E Opening Comments on the June 3 Ruling at 7-8; SDG&E Opening Comments on June 3 Ruling at 5; SCE Opening Comments on June 3 Ruling at 5.

[34] PG&E Opening Comments on the June 3 Ruling at 7-8; SCE Opening Comments on the June 3 Ruling at 6.

[35] CSE Opening Comments on the June 3 Ruling at 6; CALSTART Opening Comments on the June 3 Ruling at 4-5.

intended the program to provide a broad and flexible range of services to better serve customers.[36]

Although implementation of the FC1 BTM Rebate Program is paused, we find that continuation of the TA Program is reasonable. We agree that there is potential to use the TA budget to test concepts that could streamline energization. The purposes identified in D.22-11-040 are broad, therefore, we find it is appropriate to grant the IOUs discretion to narrow the scope of the TA services from those envisioned in D.22-11-040 if this allows them to better tailor services to support timely energization. Due to ongoing needs related to timely energization, the IOUs should ensure that the program design and objectives are aligned with supporting customer's energization requests as much as possible.[37]

We find it is appropriate for the IOUs to continue the TA Program and adopt a program budget of $36 million over three years. The three-year period for the program will begin 90 days after the Commission's approval of the Program Handbook. The TA Program budget will be stand alone and we remove the previous requirement to link TA to the FC1 BTM Rebate Program budgets. Consistent with D.22-11-040, the TA Program budget will have a six percent marketing, education and outreach (ME&O) cap. The ME&O budget is designated exclusively to inform customers about the TA Program and will run concurrently with the TA Program. The IOU allocation will be based on percent

---

[36] SDG&E Reply Comments on the June 3 Ruling at 5; SCE Reply Comments on the June 3 Ruling at 11.

[37] The TA Program continues to be available all customers regardless of program, EV rules participation, status as bundled or unbundled customers.

of electricity sales. The large IOUs shall choose one utility as the program administrator for the purpose of coordinating the submittal of the TA handbook Tier 3 advice letter. All IOUs shall implement the TA programs for their own territories. Energy Division staff shall evaluate the TA Program to assess the IOUs' progress toward targets adopted in the TA Program Handbook, reasonableness of expenditures, and effectiveness of program design in meeting program objectives

Due to the pause of the FC1 BTM Rebate Program, we find it is appropriate to limit the scope of the Program Handbook to the TA Program. The IOUs shall continue to be responsible for developing the handbook and shall hold a workshop for handbook comments within 60 days of the effective date of this decision. The Program Handbook should establish the timeline for the TA Program launch. Additionally, the Program Handbook should indicate how the ME&O budget will be used to attract customer participation in the TA Program, including: (1) proposals for development and management of the ME&O plan; (2) proposals for development of outreach materials and efforts; (3) a detailed budget that provides a clear breakdown of the proposed ME&O efforts; (4) the planned data collection strategies to track TA Program impact; and (5) any additional efforts needed to ensure customers are aware of TA Program offerings.

The TA Program Handbook shall be submitted via Tier 3 Advice Letter within 120 days of the effective date of this decision. The IOUs may propose changes to the TA Program Handbook on an annual basis via Tier 2 AL letter in the third quarter of each year, with accepted changes coming into effect 30 days after Commission disposition of the advice letter.

The Commission may consider an extension of the TA Program in the future.

3.3. Guidance on Incurred Implementation Costs

Several parties requested guidance as to cost recovery for costs they incurred in implementing the paused FC1 programs.[38] SDG&E and SCE request that the Commission reassess the cost recovery for these implementation costs.[39] No party opposes this request.

Since we have paused implementation of the FC1 BTM Rebate Program, we confirm that the Program Administrator should pause development of the program and additional expenditures. We do not impose any additional cost recovery requirements for the implementation costs incurred by the IOUs. The IOUs are authorized to recover implementation costs incurred prior to the pause with a cut-off date of 30 days following the stop work order received by SCE. The IOUs should record the implementation costs up to the cut-off date in each of their FC1 balancing accounts or subaccount within each IOU's TE Balancing Account. SCE may transfer the balance associated with the implementation costs incurred prior to the pause of the FC1 programs in its Transportation Electrification Funding Program Balancing Account (TEFPBA) to the distribution

---

[38] SDG&E Opening Comments on the June 3 Ruling at 2; SCE Reply Comments on the June 3 Ruling at 5.

[39] CLECA Opening Comments on the June 3 Ruling at 14; Clean Energy Opening Comments on the June 3 Ruling at 10.

sub-account of SCE's Base Revenue Requirement Balancing Account (BRRBA) for recovery through customers distribution rates. Account balances will be addressed during the Annual Electric Regulatory Account Balance Update filing, and termination can be addressed in the next applicable general rate case proceeding or another proceeding.

3.4. Funding Cycle Zero

Voltera, PACT, and EV Realty propose modifications to the FC0 programs, raising concerns in reply comments that requiring a vehicle purchase for every port deployed in the FC0 medium- and heavy-duty (MDHD) programs is inefficient and creates barriers to participation of charging infrastructure-as-a-service providers.[40] We agree and adopt Voltera's recommendation to remove the vehicle purchase requirement for the FC0 MDHD programs going forward. These programs include: PG&E's EV Fleet program, SCE's Charge Ready Transport program, and SDG&E's Power Your Drive for Fleets program.

While these business models were not envisioned when the FC0 MDHD programs were authorized by Commission, these charging-as-a-service providers develop sites that are intended to serve multiple fleets and have high utilization. Therefore, we find this modification aligns with the goal of preventing stranded assets that motivated the Commission's original two vehicle purchase requirement. Also, the IOUs will still be required to meet the FC0 program site and vehicle per se reasonableness metrics established in D.18-05-040 and D.19-08-026, which provide additional ratepayer protections.

---

[40] Voltera Reply Comments on the June 3 Ruling at 4; PACT Reply Comments on the June 3 Ruling at 8; and EV Realty Reply Comments on the June 3 Ruling at 5.

For the purpose of tracking progress towards *per se* reasonableness metrics, for sites where customers are purchasing vehicles, IOUs shall attribute vehicles electrified according to existing rules and practices. For the purpose of attributing vehicles electrified at charging-as-a-service sites where customers are not directly purchasing vehicles, the IOUs shall consult with their third-party evaluator and Program Advisory Councils (PACs) to determine an appropriate vehicle-per-port ratio. The IOUs shall file a Tier 1 AL letter documenting this ratio with the Commission within 30 days of presenting this information at their next PAC meeting following the issuance of this decision.

FC0 programs are currently authorized to continue until December 31, 2026. SDG&E and SCE propose extensions to the Funding Cycle Zero (FC0) programs beyond December 31, 2026 if FC1 is paused. SCE asserts that the Commission should extend the grace period for FC0 programs until funding is exhausted. SDG&E similarly indicates that the FC0 programs should be allowed to continue via a blanket extension or by request under the Commission's Rules of Practice and Procedure. Cal Advocates and TURN oppose any extension of the deadlines for the FC0 programs.[41]

We decline to extend the grace period for the FC0 programs. As noted by TURN and Cal Advocates, the uptake for the FC0 programs has been slow. We do not see the merit in making ratepayer funding available for additional time if there has not been sufficient customer interest to date. Additionally, there are existing non-ratepayer funded programs that incentivize the same infrastructure,

[41] Cal Advocates Opening Comments on the June 3 Ruling at 8.

including the Energy Infrastructure Incentives for Zero-Emission Commercial Vehicles (EnergIIZE Commercial Vehicles), California Electric Vehicle Infrastructure Project (CALeVIP), and National Electric Vehicle Infrastructure (NEVI) Program). The utilization of those programs after 2026 will also address ongoing affordability issues. Therefore, the FC0 programs should end acceptance of new customer agreements for any FC0 programs by December 31, 2026.

4. Summary of Public Comment

Rule 1.18 allows any member of the public to submit written comment in any Commission proceeding using the "Public Comment" tab of the online Docket Card for that proceeding on the Commission's website. Two substantive comments were submitted that urge the Commission to end the pause of the FC1 BTM Rebate Program.

5. Comments on Proposed Decision

The proposed decision of President Reynolds in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on November 17, 2025 by Alliance for Transportation Electrification (ATE), CASMU, CSE, Joint CCAs, Joint Commenters, PG&E, SBUA, SCE, SDG&E and UCAN.Reply comments were filed by CALSTART and Voltera on November 21, 2025 and by Acterra, ATE, Cal Advocates, CSE, PG&E, SCE, SDG&E and VGIC on November 24, 2025. We have considered the comments within the scope of the proposed decision and made modifications as appropriate.

6. Assignment of Proceeding

Alice Reynolds is the assigned Commissioner and Marcelo Lins Poirier and Colin Rizzo are the assigned Administrative Law Judges in this proceeding.

Findings of Fact

1. The Commission paused the FC1 BTM Rebate and LITE programs on June 3, 2024 pending a reassessment of those programs.
2. The objective of the data gathering and reporting structure adopted by D.22-11-022 was to streamline existing reporting requirements, minimize unnecessary or duplicative reports, and inform FC1 BTM Rebate Program reporting requirements since various decisions and rulings have required some form of data gathering and reporting for TE issues.
3. Various decisions and rulings related to TE have required some form of data gathering and reporting.
4. Utilizing a consolidated and comprehensive annual report for TE will eliminate unnecessary and overlapping requirements, while ensuring that the reporting efficiently meets the Commission's requirements.
5. An expanded stocktake is not necessary to ensure the proper authorization of additional ratepayer dollars.
6. Stakeholders can utilize the TE Compliance and Initiatives Report to evaluate affordability moving forward.
7. D.22-11-022 authorized $36 million for a TA Program linked to the TE Rebate Program.
8. The TA Program can provide value independent of the FC1 BTM Rebate Program.

9. The IOUs incurred implementation costs prior to the pause of the programs.

10. Uptake for the FC0 programs has been limited.

11. Requiring a vehicle purchase for every port deployed in the FC0 MDHD programs creates barriers to participation of charging infrastructure-as-a-service providers.

Conclusions of Law

1. Current TE data gathering and reporting requirements should be streamlined and consolidated.

2. The various required TE data reports should be consolidated into a comprehensive annual report. For the first year of implementation, the report should be due on September 30, 2026 to allow for sufficient time to finalize and implement these reporting changes. For 2027 and subsequent years, the report should be due on June 30th.

3. The annual VGI stocktake requirement should be eliminated.

4. The date of the annual VGI Forum should be shifted to Q1 of each year.

5. The reporting requirements established for CCAs by D.20-12-029 are waived until the new TE Compliance and Initiatives Report template has been developed.

6. The TA Program should continue with a budget of $36 million over three years. The three-year period for the program should begin 90 days after the Commission's approval of the Program Handbook.

7. The TA Program should be delinked from the FC1 BTM Rebate Program and other programs approved in D.22-11-040 and have a standalone Program Handbook.

8. The IOUs should be able to recover FC1 implementation costs incurred prior to the pause with a cut-off date of 30 days following the stop work order received by SCE.

9. The requirement for vehicle purchases for the FC0 MDHD programs should be removed on a going forward basis.

10. The FC0 programs should end acceptance of new customer agreement by December 31, 2026.

O R D E R

IT IS ORDERED that:

1. Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Liberty Utilities (CalPeco Electric) LLC, Bear Valley Electric Service Inc., and PacifiCorp d/b/a Pacific Power shall implement the revised requirements for transportation electrification data gathering and reporting as adopted in this decision.

2. Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Liberty Utilities (CalPeco Electric) LLC, Bear Valley Electric Service Inc., and PacifiCorp d/b/a Pacific Power shall continue implementing the Technical Assistance Program with a budget capped at $36 million over three years. A Program Handbook specific to the Technical Assistance Program shall be developed, consistent with the guidance in Decision 22-11-040. The investor-owned utilities shall hold a workshop for the

development of the Technical Assistance Program Handbook within 60 days of the effective date of this decision.

3. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company shall record the implementation costs up to the cut-off date in each of their Funding Cycle One balancing accounts or subaccount within each company's Transportation Electrification Balancing Account.

4. Rulemaking 23-12-008 remains open.

This order is effective today.

Dated December 5, 2025, at San Francisco, California.

ALICE REYNOLDS
President
DARCIE L. HOUCK
JOHN REYNOLDS
KAREN DOUGLAS
MATTHEW BAKER
Commissioners