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**PROPOSED DECISION** Agenda ID #23941 (Rev 1)

**Quasi-Legislative**

**2/5/2026 Item #33**

Decision **PROPOSED DECISION OF COMMISSIONER ALICE REYNOLDS**  
**(Mailed 12/24/2025)**

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to  
Establish Energization Timelines.

Rulemaking 24-01-018

**DECISION ESTABLISHING A STANDARD OFFER FOR  
FLEXIBLE SERVICE CONNECTIONS**

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## **DECISION ESTABLISHING A STANDARD OFFER FOR FLEXIBLE SERVICE CONNECTIONS**

### **Summary**

This decision directs Pacific Gas and Electric Company (PG&E) and Southern California Edison Company (SCE) to establish a standard offer process within the Design and Engineering step of their energization process that establishes an optional Flexible Service Connection<sup>1</sup> (FSC) agreement for customers affected by distribution capacity constraints. PG&E and SCE are required to implement ongoing data collection and reporting to facilitate refinement of the standard offer, make associated changes to their Tariff Rules, and file a report summarizing the cost-efficiency of this standard offer process. PG&E and SCE are directed to formalize the preliminary capacity assessment processes that currently allow their prospective customers to evaluate the likelihood of suitable capacity at a particular grid location. SCE is directed to prepare and file a report assessing learnings from the FSC pilot that concluded on January 3, 2026.

This proceeding remains open to address remaining Phase II issues.

### **1. Background**

In 2023, the legislature enacted the Powering Up Californians Act (Senate Bill (SB) 410) and Assembly Bill (AB) 50. Both bills require the Commission to establish requirements and processes to accelerate energization for customer projects.

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<sup>1</sup> A Flexible Service Connection allows a customer who is waiting for an upgrade to use more power when the expected grid conditions indicate that it will be safe for them to use this power.

On January 1, 2024, the Commission opened Rulemaking (R.) 24-01-018 to implement certain provisions of AB 50, and SB 410. On March 28, 2024, the Assigned Commissioner issued their Scoping Memo and Ruling (Scoping Memo), establishing issues to be considered in two phases. In Phase 1 of the proceeding, the scoping memo outlined issues related to implementing the required provisions of AB 50 and SB 410. Phase 2 of the scoping memo included a list of preliminary remaining issues.

On September 11, 2024, Enphase Energy, Inc. (Enphase) filed a motion (Enphase Motion) to issue a revised Scoping Memo accelerating the adoption of Power Control Systems (PCS), to incorporate the record of R.21-06-017, to order a workshop or workshops culminating in a staff proposal, and to issue a decision addressing 11 enumerated elements.

On September 12, 2024, the Commission approved Decision (D.) 24-09-020. D.24-09-020 resolves Phase 1 rulemaking issues in this proceeding, articulates eight standard energization steps for Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) (Large IOUs), sets forth average and maximum timelines for achieving the full set of energization steps requiring upgrades, and establishes an energization target for the Large IOUs to meet.

On December 16, 2024, pursuant to Commission direction,<sup>2</sup> the Large IOUs each filed a report detailing their plans to deploy bridging strategies<sup>3</sup> that accommodate energization requests that trigger distribution capacity work.

On February 7, 2025, the assigned Administrative Law Judge (ALJ) issued a ruling clarifying next steps for Flexible Service Connections (FSCs), modifying the Phase 2 schedule, clarifying that it is not necessary to modify that Scoping Memo to address issues raised by the Enphase Motion, and requesting party comment (Next Steps Ruling). The Next Steps Ruling established that this effort (Next Steps Effort) is focused on standardizing FSCs for the purpose of avoiding energization delays caused by upstream capacity constraints, and that the FSC terms will be simple enough to implement in the very near term.<sup>4</sup>

Eighteen parties filed opening comments to the Next Steps Ruling on March 13, 2025. These parties include the Alliance for Automotive Innovation (AAI), the California Community Choice Association (CalCCA), CALSTART, Inc. (CALSTART), the California Association of Small and Multi-Jurisdictional Utilities (CASMU), Clean Coalition, Critical Loop, Inc. (Critical Loop), Environmental Defense Fund (EDF), Enphase, The Interstate Renewable Energy Council, Inc. (IREC), The Mobility House (TMH), Natural Resources Defense Council (NRDC), Powering America's Commercial Transportation (PACT), the Public Advocates Office at the California Public Utilities Commission (Cal

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<sup>2</sup> D.24-10-030 Ordering Paragraph 18.

<sup>3</sup> Bridging strategies are used by IOUs to accommodate energization requests until the grid upgrades triggered by those requests can be performed.

<sup>4</sup> Next Steps Ruling at 4.

Advocates), PG&E, SCE, SDG&E, The Utility Reform Network (TURN), and Vehicle-Grid Integration Council (VGIC).

Thirteen parties filed reply comments to the Next Steps Ruling on March 28, 2025. These parties include CALSTART, EDF, Enphase, IREC, TMH, NRDC, PACT, PG&E, SCE, SDG&E, Tesla, Inc. (Tesla), TURN, and VGIC.

On May 22, 2025, the assigned ALJ issued a ruling directing utilities currently offering a static FSC agreement to file additional information providing transparency on these offerings and allowing party comment upon these filings (Transparency Ruling). The Transparency Ruling reiterated the focus established in the Next Steps Ruling and further clarified that the FSCs will be based on pre-programmed Limited Load Profiles (LLPs) and will not address customer compensation, will not be used in the absence of constrained capacity, and will not utilize communications. The ruling also agrees with SCE's previous clarification that there can be capacity constraints at locations other than the circuit level and that the implications posed by service and upstream constraints should be considered in this Next Steps Effort.<sup>5</sup>

PG&E and SCE each filed responses to the Transparency Ruling on May 30, 2025, June 6, 2025, and June 13, 2025. PG&E also provided an amended response on July 9, 2025.

EDF filed comments on the Transparency Ruling on June 11, 2025.

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<sup>5</sup> Next Steps Ruling at 3.



Cal Advocates, CALSTART, CalCCA, EDF, IREC, SDG&E, and VGIC filed comments on PG&E and SCE's responses to the Transparency Ruling on July 8, 2025.

Emerald AI was granted party status on January 16, 2026.

### **1.1. Submission Date**

This matter was submitted on July 9, 2025 upon PG&E's filing of an amended response to the Transparency Ruling.

### **1.2. Definitions and Acronyms**

This decision draws on ten terms that were defined within the Next Steps Ruling. Parties supported standardized definitions, recommended that they be included in this decision or the Electric Tariff Rules, and contributed to their content.<sup>6</sup> These definitions were further expanded to clarify what is meant by bridging solutions, and refined in response to party comments; the updated definitions and their acronyms are provided in Appendix A.<sup>7</sup>

## **2. Issues Before the Commission**

The issues before the Commission are as follows:

- a. Whether to establish standard offer FSCs delivering firm capacity in the near-term to expedite energization when there are distribution capacity constraints, and if so, what requirements to establish for standard offer FSCs;

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<sup>6</sup> EDF Opening Comments on Next Steps Ruling at 16, 19-20; NRDC Reply Comments on Next Steps Ruling at 4.

<sup>7</sup> EDF Opening Comments on Next Steps Ruling at 2, Appendix A.

- b. Whether to establish any process changes, tariff<sup>8</sup> changes, or other requirements to support the implementation of standard offer FSCs;
- c. Whether to formalize and align preliminary capacity assessment requirements;<sup>9</sup> and
- d. Whether to revisit the pause on energization timelines that results from an upstream capacity constraint.<sup>10</sup>

These issues are the subject of the Next Steps Effort and are a component of issues three and four of Phase 2 of the Scoping Memo:

(3) Should additional actions beyond compliance with SB 410 and AB 50 be implemented to improve energization timelines, processes, or tariffs in Phase 2 of this proceeding?

(4) What actions can expedite energization projects, including when upstream upgrades are necessary? This decision builds on the improvements made in D.24-09-020 to the IOUs' energization process.

The Commission may consider other aspects of issues three and four of Phase 2 of the Scoping Memo in future decisions.

### **3. FSC Offerings Providing Lessons Learned**

The concept of Flexible Connection is allowing the customer to match their site's power levels to the amount of power that the grid can safely handle. The

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<sup>8</sup> PG&E's Electric Rule 1 defines tariffs as: The entire body of effective rates, rentals, charges, and rules, collectively, of PG&E, including title page, preliminary statement, rate schedules, rules, sample forms, service area maps, and list of contracts and deviations.

<sup>9</sup> Preliminary capacity assessments allow a customer to understand the level of electrical power available at a particular point on the grid. In its Opening Comments on Next Steps Ruling at 14, CALSTART articulated inconsistencies in the provision of preliminary capacity assessments.

<sup>10</sup> Decision 24-09-020 established a process whereby Large IOUs pause the energization target timelines upon notification of the customer that an upstream capacity constraint has been identified.

customer does this by adhering to a profile of values generated by IOU engineers. When the customer is controlling the power they are generating and sending back to the grid, it is part of the Interconnection process and the profile is called a Limited Generation Profile. When the customer is controlling the power that they are consuming from the grid, it is part of the Service Connection process and the profile is called a Limited Load Profile, provided as part of a FSC. In evaluating the direction to pursue when formalizing FSCs, this proceeding requested party comments on other FSC offerings to identify applicable lessons learned.

### **3.1. No Directly Applicable Examples from other Jurisdictions**

In response to the Next Steps ruling, multiple parties identified efforts to implement similar programs within California and other jurisdictions.

Several parties cited frameworks utilized in Australia<sup>11</sup> and Northern Europe,<sup>12</sup> but noted that those jurisdictions' solutions are unlikely to map well to our regulatory structure. Similarly, multiple parties pointed to promising

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<sup>11</sup> Clean Coalition Opening Comments on Next Steps Ruling at 2; Enphase Opening Comments on Next Steps Ruling at 3-4; Critical Loop Opening Comments on Next Steps Ruling at 4-6.

<sup>12</sup> Critical Loop Opening Comments on Next Steps Ruling at 4-6; TMH Opening Comments on Next Steps Ruling at 7; Enphase Opening Comments on Next Steps Ruling at 3-4.

developments in Colorado,<sup>13</sup> Illinois,<sup>14</sup> Massachusetts,<sup>15</sup> New York,<sup>16</sup> Connecticut,<sup>17</sup> and Texas<sup>18</sup> but none identified discrete lessons learned that those efforts could provide for California FSCs. Ultimately, parties are not aware of any standardized, scalable processes in the United States that California can look to for learnings.<sup>19</sup>

### **3.2. Examples of Currently Offered FSCs within California**

FSCs currently being offered by PG&E and SCE vary in their structure and level of adoption. Both SCE and PG&E offer a FSC built on a static LLP that provides firm capacity, and PG&E offers a FSC utilizing forecasts and communications to provide non-firm capacity.<sup>20</sup> All FSCs currently offered by California IOUs have a common structure; they are bridging solutions<sup>21,22</sup>

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<sup>13</sup> Enphase Opening Comments on Next Steps Ruling at 3-4; EDF Opening Comments on Next Steps Ruling at 8.

<sup>14</sup> Enphase Opening Comments on Next Steps Ruling at 3-4; EDF Opening Comments on Next Steps Ruling at 8; TMH Opening Comments on Next Steps Ruling at 7.

<sup>15</sup> Enphase Opening Comments on Next Steps Ruling at 3-4; EDF Opening Comments on Next Steps Ruling at 7.

<sup>16</sup> Enphase Opening Comments on Next Steps Ruling at 3-4; EDF Opening Comments on Next Steps Ruling at 6-7 TMH Opening Comments on Next Steps Ruling at 8.

<sup>17</sup> Critical Loop Opening Comments on Next Steps Ruling at 4-6.

<sup>18</sup> Critical Loop Opening Comments on Next Steps Ruling at 2.

<sup>19</sup> VGIC Opening Comments on Next Steps Ruling at 6.

<sup>20</sup> PGE Opening Comments on Next Steps Ruling at 2-3.

<sup>21</sup> PGE Opening Comments on Next Steps Ruling at 2, SCE Bridging Strategies and Solutions report at 6-7.

<sup>22</sup> Bridging solutions are also referred to as “bridge to wires” solutions throughout the record. These terms are functionally equivalent.

restricted to a single customer<sup>23</sup> who is encountering a distribution capacity constraint. In each offering, once that distribution capacity constraint is resolved, the FSC is no longer necessary.

### **3.2.1. California's Static FSCs**

PG&E has offered Load Limit Letters (LLL) as a non-tariffed option on an ad-hoc basis since July of 2023.<sup>24</sup> PG&E has issued over 100 LLLs,<sup>25</sup> either as stand-alone offerings or as part of PG&E's Flex Connect pilot. PG&E's LLLs have an average duration for FSCs of approximately 3 years.<sup>26</sup> PG&E data on expected timelines for upstream capacity upgrades indicate that nearly all currently contemplated upstream upgrades will be completed prior to 2029.<sup>27</sup>

SCE has enrolled customers within the Load Control Management Study (LCMS) pilot program since December 2023 under two options. The "localized autonomous" LCMS option provides a static FSC, while the "communication-based" LCMS option offers a dynamic FSC.<sup>28</sup> SCE states<sup>29</sup> that eight customers have entered into LCMS agreements, exclusively within the localized

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<sup>23</sup> SCE June 13, 2025 response to Transparency Ruling at 3.

<sup>24</sup> PG&E Amended Clarified FSC Data Sheet.

<sup>25</sup> IREC Opening Comments on Next Steps Ruling at PGE 1:067-068.

<sup>26</sup> PG&E Amended Clarified FSC Data Sheet.

<sup>27</sup> PG&E Amended Clarified FSC Data Sheet; SCE FSC Participant data for Topic 4 in Section 3.1.

<sup>28</sup> Enphase Opening Comments on Next Steps Ruling at 5, citing AL 5138-E at 9.

<sup>29</sup> SCE Transparency Ruling Response – SCE FSC Participant data for Topic 4 in Section 3.1.

autonomous framework. There is no record of any projects deployed under the communication-based LCMS.<sup>30</sup> This pilot concluded on January 3, 2026.<sup>31</sup>

### **3.2.2. California's Dynamic FSCs**

Both PG&E's Flex Connect and SCE's Communication-Based LCMS pilots intend to offer non-firm capacity through communications originating from Distributed Energy Resource Management Systems (DERMS) which inform customer owned PCS that have been approved and commissioned by the IOUs. As the Next Steps Effort is focused on FSCs providing firm capacity,<sup>32</sup> we will not be providing a fulsome discussion of these pilots in this decision. Consideration of FSCs providing non-firm capacity will occur in the High Distributed Energy Resource (DER) proceeding (R.21-06-017).<sup>33</sup>

## **4. Discussion of Whether to Establish Standard Offer Static FSCs**

All responding parties support establishing Standard Offer FSCs delivering firm capacity in the near-term to expedite energization when there are

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<sup>30</sup> IREC Opening Comments on Next Steps Ruling at SCE 1:016.

<sup>31</sup> SCE Opening Comments on Next Steps Ruling, at 1.

<sup>32</sup> Transparency Ruling at 3.

<sup>33</sup> The Commission takes official notice of the November 3, 2025 Assigned Commissioner's Ruling at 10-11, 16;

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M586/K143/586143237.PDF>, accessed on November 20, 2025.

distribution capacity constraints.<sup>34</sup> In addition, parties urge rapid and clear direction<sup>35</sup> establishing a Standard Offer FSC.

The record of this proceeding establishes that a static FSC is a viable technical solution for customers when the need for grid upgrades would prevent an IOU from meeting the customer's requested energization timeline.

Customers from both PG&E<sup>36</sup> and SCE<sup>37</sup> have experienced ongoing upstream distribution capacity constraints that prevent timely energization<sup>38</sup>. Upon review of party responses to the Next Steps and Transparency rulings and the proceeding record, we find it reasonable to direct PG&E and SCE to implement a Standard Offer Static FSC (Standard Offer) at this time. We note that SCE's LCMS will conclude on January 3, 2026 and that PG&E's LLL offering is currently informal. More detail on the rationale for directing the formalization of the IOU offerings is given in Section 4.3. Evaluation of the offerings shows that PG&E's LLL has achieved higher numbers,<sup>39</sup> both in terms of total customers and in terms of capacity unlocked. Accordingly, the Standard Offer shall be modeled on PG&E's LLL to the extent possible within SCE's processes.

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<sup>34</sup> TURN PD Opening Comments at 1; TURN notes that their support is contingent on not imposing adverse impacts on other customers

<sup>35</sup> VGIC Opening Comments on Next Steps Ruling at 5-6; CALSTART Reply Comments on Next Steps Ruling at 2-3; IREC Comment on Responses to Transparency Responses at 2, 5; EDF Reply Comments on Next Steps Ruling at 2.

<sup>36</sup> PG&E Bridging Solutions Strategies report at 8.

<sup>37</sup> SCE Bridging Strategies and Solutions report at 2.

<sup>38</sup> PG&E Amended Clarified FSC Data Sheet; SCE FSC Participant Data.

<sup>39</sup> PG&E Amended Clarified FSC Data Sheet; SCE FSC Participant Data for Topic 4 in Section 3.1.

SDG&E notes that it has not yet experienced upstream capacity constraints that trigger the need to deploy bridging solutions.<sup>40</sup>

Multiple parties<sup>41</sup> anticipate a future need for bridging solutions from SDG&E. IREC notes the length of time taken for SDG&E upstream capacity upgrades and anticipates that customers will likely wait many years to energize when their projects require significant distribution upgrades in SDG&E's territory.<sup>42</sup> TURN notes that SDG&E's recent SB 410 application requested over \$300 million for incremental energization, showing that SDG&E anticipates conditions analogous to those motivating FSCs by PG&E and SCE.<sup>43</sup>

PacifiCorp's territory is crossed by corridors identified by the National Zero-Emission Freight Corridor Strategy<sup>44</sup> and may encounter future upstream capacity constraints that trigger the need for bridging solutions.

As SDG&E and PacifiCorp are likely to encounter upstream capacity constraints in the future, we encourage them to consider steps needed to prepare to provide their customers with a Standard Offer. At this time, however, there is no record of SDG&E or PacifiCorp customers unable to be energized in a timely fashion and we do not direct SDG&E or PacifiCorp to take specific actions related to FSCs.

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<sup>40</sup> SDGE Bridging Strategies and Solutions report at A-7.

<sup>41</sup> VGIC Opening Comments on Next Steps Ruling at 5; PACT Reply Comments on Next Steps Ruling at 5; IREC Opening Comments on Next Steps Ruling at 21.

<sup>42</sup> IREC Opening Comments on Next Steps Ruling at 21.

<sup>43</sup> TURN PD Opening Comments at 4.

<sup>44</sup> CALSTART Reply Comments on Next Steps Ruling at 7-8.



Any party to this proceeding may file a motion within this proceeding or its successor proceeding, requesting that the Commission require SDG&E or PacifiCorp to provide its customers with a Standard Offer.<sup>45</sup> Such a motion shall include information establishing both that the IOU currently has an upstream capacity constraint that prevents timely customer energization, and that conditions causing the IOU's inability to provide timely energization are likely to become ongoing.

**4.1. PG&E and SCE Are Required to Provide a Standard Offer Flexible Service Connection**

PG&E and SCE are the IOUs that have experienced capacity constraints preventing them from being able to serve customers in a timely fashion at their full load. Accordingly, we direct PG&E and SCE to file a joint Tier 2 Advice Letter within 60 days of the issuance date of this decision implementing the Standard Offer as specified in this decision (Implementation Advice Letter) within 60 days of the issuance date of this decision. The customer agreement for the Standard Offer shall be modeled upon Scenario 2 of the LLL submitted as Attachment A of PG&E's May 30, 2025 response to the Transparency Ruling. SCE shall, within the Implementation Advice Letter, articulate any divergence between their Standard Offer and PG&E's and describe with specificity the factors that require this divergence.

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<sup>45</sup> If there is no open proceeding, parties are able to file a petition for rulemaking.

#### **4.2. Decline to Require Small Multi-Jurisdictional Utilities to Provide a Standard Offer**

CASMU asserts that there is no basis or justification to extend FSC requirements to the Small Multi-Jurisdictional Utilities (SMJUs) and claims that extending FSC requirements to the SMJUs would create a large burden for small utilities without adequate staff to design and monitor bespoke FSC solutions for individual customers.<sup>46</sup> We agree that extending FSC requirements to the SMJUs would be burdensome and acknowledge that no SMJU is experiencing upstream capacity constraints at this time. Accordingly, we decline to impose any Standard Offer obligations on SMJUs at this time. We encourage the SMJUs to work with customers and provide Standard Offer type capacity if a customer should request it.

#### **5. Standard Offer Static Flexible Service Connection Structure**

The Standard Offer relies upon existing processes, envisioned as an amalgamation of the PG&E and SCE offerings. While the Standard Offer is largely a formalization of PG&E's LLL structure, the record does not provide comprehensive documentation of the LLL structure, and the record has illuminated areas where divergence from PG&E's structure (e.g., defined minimum levels of granularity, UL 3141 safe harbor) is warranted.

In order to accomplish the Next Steps objective of a standardized FSC that can be implemented in the very near-term, we strike a balance between defining the structure of the Standard Offer to the extent supported by the record,

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<sup>46</sup> CASMU Opening Comments on Next Steps Ruling at 2.

allowing flexibility where the record is underdeveloped or there is the probability that such flexibility will lead to better outcomes, and directing PG&E to articulate the structure of current offerings as part of the implementation process.

Both PG&E and SCE have offered their FSCs as an alternate pathway within Energization Step 2. We find it reasonable to direct PG&E and SCE to provide the Standard Offer via a Form Agreement as an alternate pathway within Energization Step 2, and in so doing, place it within a Commission approved tariff.

**5.1. The Standard Offer Flexible Service Connection Structure is Based Upon Existing Offerings**

Implementation of a Standard Offer in the very near term relies upon utilizing the practices proven successful in existing offerings where practicable and expanding on those practices as necessary. We find that there are no directly transferable policy frameworks from other jurisdictions that can be used as a model for the Standard Offer at this time. We find it reasonable to base the Standard Offer on practices currently used in PG&E's Load Limiting Letter and SCE's LCMS pilot.<sup>47</sup>

PG&E and SCE offerings differ in their structures and practices. The record shows that PG&E's offerings have enabled both a greater number of customers to be energized and larger amount of distribution capacity to be unlocked. When

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<sup>47</sup> "LCMS" refers to the local autonomous offering unless the communications based option is specified.

practices from the PG&E and SCE offerings diverge, it is reasonable to utilize practices from PG&E's offering.

In Opening Comments, PG&E clarifies that the present enrollment in LLL reflects a small, carefully curated population whose outcomes cannot be extrapolated to all customer types and grid conditions. It further notes that the ability to "trust and verify" today depends on selective enrollment, personal communication with each customer, site specific engineering judgment, customer operational maturity, and the ability to decline FSCs where grid conditions or customer characteristics pose heightened risk.<sup>48</sup>

We clarify that within the Standard Offer, PG&E and SCE will retain the discretion to decline to offer FSCs, according to transparent criteria, where grid conditions or customer characteristics pose heightened risk. The IOU ability to decline goes hand in hand with the "trust and verify" approach that allows customers the discretion to control site load in the manner of their choosing without the burden of IOU commissioning.

## **5.2. Continuation of Current Offering for PG&E and SCE**

PG&E is authorized to continue utilizing its LLL offering for new and previously served customers until the Standard Offer Form Agreement tariffed offering becomes effective.

SCE's LCMS offering is a fixed duration pilot<sup>49</sup> and we decline to extend its duration in this decision. SCE is authorized to continue serving the 5

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<sup>48</sup> PG&E PD Opening comments at 2.

<sup>49</sup> SCE Advice Letters 5138-E and 5138-E-A.

participating LCMS customers and the 8 customers that were offered LCMS participation prior to January 3, 2026<sup>50</sup> under the conditions established in that pilot. We note that PG&E has successfully implemented its LLL offering as a non-tariffed option and SCE is able to do the same until the Standard Offer becomes effective.

### **5.3. The Use Case for the Standard Offer**

Parties have noted various use cases in which FSCs have the potential to save ratepayer funds by avoiding upgrades, to promote electrification on unconstrained circuits,<sup>51</sup> to support community resiliency and microgrids,<sup>52</sup> and to support capacity marketplaces. These use cases may have the potential to yield significant benefits to ratepayers and customers. We decline, however, to address these use cases within this decision.

The issue before the Commission is whether to establish a Standard Offer for the near-term. Accordingly, this decision establishes a Standard Offer solely for the use case of providing firm capacity as a bridging solution for a single customer until such time as a capacity constraint is addressed and the customer is provided with full capacity. Both new customers seeking service and existing customers seeking to expand their capacity are eligible for the Standard Offer.

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<sup>50</sup> SCE PD Opening Comments at 6.

<sup>51</sup> Clean Coalition Opening Comments on Next Steps Ruling at 7.

<sup>52</sup> Clean Coalition Opening Comments on Next Steps Ruling at 7-9.

#### **5.4. The Standard Offer Shall be Formalized Within a Tariffed Option**

PG&E has extended a LLL to over 100 projects as a non-tariffed option to expedite deployment and maintain flexibility.<sup>53</sup> TMH notes that even in the absence of a pilot, implementation of load managed service can be accomplished by a knowledgeable provider familiar with the National Electric Code and capable of convincing both the authority having jurisdiction and the utility to sign off on its design.<sup>54</sup>

While FSCs are possible to implement informally, requiring a tariffed Standard Offer via a Form Agreement offers several advantages. Parties advocate for standardized language and program design, and believe that a standalone Commission-approved document accessible to customers would be adequate.<sup>55</sup> A tariffed Standard Offer addresses the concern PG&E raises around its limited ability to enforce compliance in the LLL structure.<sup>56</sup> A tariffed option also allows stakeholder input through comment on the advice letter that implements it. Further, if unforeseen circumstances emerge, a tariffed option provides a pathway for Commission review and memorialization of any deviations to the Standard Offer.

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<sup>53</sup> PG&E Opening Comments on Next Steps Ruling at 2.

<sup>54</sup> TMH Opening Comments on Next Steps Ruling at 13.

<sup>55</sup> IREC Opening Comments on Next Steps Ruling at 28-9; SDG&E Opening Comments on Next Steps Ruling at 7; EDF Opening Comments on Next Steps Ruling at 16.

<sup>56</sup> PG&E's June 13, 2025 Response to Transparency Ruling at 11.

PG&E asserts that the use of a standard form allows refinements without requiring amendments for each customer who requests or requires a variation.<sup>57</sup>

Accordingly, we find it reasonable to direct PG&E and SCE to provide the Standard Offer within a tariff. PG&E and SCE shall file a Tier 2 advice letter establishing the Standard Offer (Implementation Advice Letter) consistent with this decision, as a standard form, and in so doing place it within a Commission approved tariff. As the Implementation Advice Letter largely formalizes existing processes within PG&E's LLL offering, we find it reasonable to require that the Implementation Advice Letter be filed no later than 60 days from the issuance of this decision. The structural, technical, and data collection elements required to be a part of the Implementation Advice Letter are articulated within this decision.

#### **5.5. Customer Opportunity to Express Interest in the Standard Offer**

PG&E's and SCE's practice is to evaluate the suitability of a FSC as a part of the Engineering and Design Energization step<sup>58</sup> (Step 2), after a customer has submitted a complete application and completed the IOU intake process (Step 1). If an initial engineering evaluation of the application indicates that the customer cannot be provided capacity sufficient to meet their "metered demand," PG&E will contact the customer, educate them on FSCs, and confirm that they are interested in and capable of implementing a bridging solution before conducting

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<sup>57</sup> PG&E PD Opening comments at 3.

<sup>58</sup> D.24-09-020 established 8 discrete steps in the energization process, *see* D.24-09-020 at 24-26.

a full study and computing the possible LLP.<sup>59</sup> SCE's LCMS process is to complete both an engineering evaluation and full study, determine that there will be periods of unconstrained capacity in each season, and only then reach out to the customer.<sup>60</sup>

Several parties<sup>61</sup> find value in establishing customer communications earlier in the process, proposing that the IOUs both add information on the Standard Option and add a check box allowing customers to indicate interest in a FSC to their service application. PG&E is open to adding this checkbox.<sup>62</sup> We find that there is value both in assuring that customers are aware of the existence of a static FSC and in allowing them to express interest in utilizing that FSC. We find it reasonable to require PG&E and SCE to add such information and a check box to the web page(s) that customers use to apply for service.

PG&E and SCE are directed to include updated customer application documents and sample informative language within the Implementation Advice Letter. The informative language shall be developed in consultation with the Commission's Energy Division and must, at a minimum, address the topics specified in Appendix B.

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<sup>59</sup> PG&E June 13, 2025 response to Transparency Ruling at 2-3.

<sup>60</sup> SCE June 13, 2025 response to Transparency Ruling at 2-3.

<sup>61</sup> CALSTART Opening Comments on Next Steps Ruling at 3, 13; EDF Opening Comments on Next Steps Ruling at 16; CalCCA Opening Comments on Next Steps Ruling at 7; TURN Reply Comments on Next Steps Ruling at 2; IREC Reply Comments on Next Steps Ruling at 25.

<sup>62</sup> PG&E June 13, 2025 response to Transparency Ruling at 5.



### **5.6. PG&E and SCE Shall Identify What Characteristics Make for an Ideal Standard Offer Customer within the Implementation Advice Letter**

When asked about the information used to determine whether a customer is a good candidate for their static FSC offerings,<sup>63</sup> PG&E and SCE have replied with general descriptions of limitations. These descriptions have included load ramp and load profile compared to the local distribution system,<sup>64</sup> a prior FSC customer on shared constrained componentry, and underground temperature or transmission constraints.

In proposed decision (PD) opening comments, PG&E further clarifies that the appropriateness of offering a LLL is dependent upon these customer characteristics:<sup>65</sup>

- Constraint type & location;
- Magnitude & timing of capacity a FSC can safely deliver (LLP granularity, seasonal/daily profile, etc.);
- The materiality of the FSC opportunity (i.e., whether it is sufficient to justify proceeding); and
- The customer's ability to control load shape and ramp to adhere to the LLP<sup>66</sup>.

In the Implementation Advice Letter, PG&E and SCE shall expand their discussion from general limitations contraindicating a FSC to identifying the

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<sup>63</sup> Transparency Ruling Section 3.2, questions 1 and 2; Next Steps Ruling question 10.

<sup>64</sup> PG&E June 13, 2025 response to Transparency Ruling at 2-3, 16; SCE June 13, 2025 response to Transparency Ruling at 2-3; SCE Reply Comments on Next Steps Ruling at 8.

<sup>65</sup> PG&E PD Opening comments at 2-3.

<sup>66</sup> This is also referred to as "customer operational maturity".

characteristics that cause a customer to be an ideal candidate for the Standard Offer. This identification shall include the full set of characteristics used to date for determining whether LLL is appropriate to a customer and the discrete criteria that have been used to evaluate appropriateness within those characteristics.

Irrespective of the characteristics that cause a customer to be an ideal candidate, PG&E and SCE shall clarify in the Implementation Advice Letter that they will provide a customer with a Standard Offer upon their determination that there exists a LLP whose operation will result in a benefit to both the customer and to ratepayers, and that a customer will be able to safely operate under the required framework.

**5.7. The Implementation Advice Letter Shall Address Constraints Associated with Underground Components**

SCE's LCMS disallows projects whose capacity constraint includes underground duct bank systems, noting the lack of a mechanism for timely monitoring of their temperature and the potential for severe system failure if these cables' temperature exceeds limits for extended amounts of time.<sup>67</sup> SCE, however, has enrolled a customer whose capacity constraint results from underground cable temperatures.<sup>68</sup> We find that while there may be merit in this sort of restriction, the record is not sufficiently developed to impose specific restrictions at this time. We find it reasonable to direct PG&E and SCE to list in

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<sup>67</sup> SCE June 13, 2025 Response to Transparency Ruling at 3.

<sup>68</sup> SCE FSC Participant Data for topic 4 in section 3.1 at cell S10.

the Implementation Advice Letter, with specificity, which underground components have been identified as a disqualifying factor for the Standard Offer. The Implementation Advice Letter shall include a narrative explaining the rationale under which each identified underground component is being identified as a disqualifying factor.

**5.8. The Standard Offer Need Not Establish a Dispute Resolution Process**

Clean Coalition cites the Australian FSC experience and the need to ensure that customer concerns are addressed in an expedient manner as a basis for requiring that the Standard Offer be accompanied by a dispute resolution process.<sup>69</sup>

The record of this proceeding does not indicate that the Standard Offer is any more likely to encounter customer disputes than conventional energization or that the methods for reporting energization delays articulated in D.24-09-020<sup>70</sup> are insufficient. We find that there is no demonstrated need to establish a Standard Offer dispute resolution process at this time.

**5.9. The Standard Offer Shall Provide Customers a Minimum Level of Granularity and Provide PG&E and SCE Flexibility to Exceed the Minimum**

Considerable record has been generated on the appropriate level of granularity within the LLP used for the Standard Offer. Parties indicate a desire for predictable LLP values and for customers and utilities to agree on whatever

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<sup>69</sup> Clean Coalition Opening Comments on Next Steps Ruling at 5, 12.

<sup>70</sup> D.24-09-020 at 63.

level of granularity is practical for a given project.<sup>71</sup> There is general agreement that greater granularity both requires greater engineering resources and has the potential to deliver greater capacity to customers. There is no consensus, however, on what level of granularity will both maximize the customer benefit and allow the scaling of the Standard Offer by minimizing the drain on engineering resources.

SCE segments the year into three seasons and provides both a full capacity period and a reduced capacity period within each season, comprising a granularity of six annual values. PG&E takes a more bespoke approach, provisioning capacity based upon time of day, a single static value, seasonal limits using four seasons,<sup>72</sup> or a combination of these bases<sup>73</sup> depending upon their operations and distribution grid conditions.

By both requiring a minimum level of granularity (six values) and allowing the PG&E and SCE discretion to exceed that minimum, we balance the need for predictable, replicable profiles to quickly scale the Standard Offer with an appreciation for the creativity demonstrated by IOU engineers in identifying bespoke solutions that benefit FSC customers.

We direct both PG&E and SCE to specify, in the Implementation Advice Letter, the start and end dates for a minimum of three standard seasons. We direct PG&E and SCE to offer a minimum of two daily values for each season,

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<sup>71</sup> Enphase Opening Comments on Next Steps Ruling at 3; PG&E Opening Comments on Next Steps Ruling at 7.

<sup>72</sup> PG&E amended FSC Data sheet; Data Dictionary tab, cells B20-B24.

<sup>73</sup> PG&E Bridging Solutions Strategies report at 2-3.

and recognize that they may provide a LLP with a lower or higher number of values on a case-by-case basis. While we encourage the IOUs to strive for consistency in the dates of their seasons, we note that variations in climate and latitude may require different standard seasonal dates for different IOUs, and that these variations or customer constraints may require an IOU to diverge from its standard season dates on a case-by-case basis. PG&E and SCE are free to provide more than the minimum six values if, in their estimation, site or grid conditions justify a higher level of granularity. If an IOU already offers customers an LLP with three or more seasons with two or more daily values per season, then they already comply with this direction. Conversely, PG&E and SCE may provide a less granular profile at the customer's request.

We recognize that multiple parties<sup>74</sup> advocated for a 24-value level of granularity and that circumstances may lead IOU and customers to disagree about the appropriate level of granularity. If the IOU has the technical capability, we direct them to provide customers with the option, during the iterative discussions following the initial customer load limit conversation detailed in Section 7.1, of requesting a 24-value LLP that has two daily values for each of the 12 months. The cost of requesting a 24-value LLP shall be borne by the requesting customer and shall not exceed the anticipated labor cost of

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<sup>74</sup> EDF Opening Comments on Next Steps Ruling at 10; IREC Opening Comments on Next Steps Ruling at 14, PAO Opening Comments on Next Steps Ruling at 5, VGIC Opening Comments on Next Steps Ruling at 8-9,10; Reply – CALSTART Reply Comments on Next Steps Ruling at 5, IREC Reply Comments on Next Steps Ruling at 3.

performing additional analysis. PG&E and SCE shall track the number of 24-value LLP requests and the outcomes of those requests.

#### **5.10. Sharing Capacity Among Multiple Standard Offer Customers**

Questions around shared capacity take several forms. We address each form within the following sections.

##### **5.10.1. Whether Capacity Should be Shared**

To date, PG&E and SCE have not allowed the sharing of capacity among multiple FSC customers accessing the same infrastructure. SCE disallowed this sharing as a part of its pilot design, and PG&E does not keep sufficient records to easily determine which piece(s) of shared infrastructure might have insufficient capacity if a second customer were allowed a FSC.<sup>75</sup> Other parties, however, have noted that there may be safe opportunities to more fully utilize ratepayer funded infrastructure.<sup>76</sup>

For example, if a factory working the day shift is located on the same portion of a circuit as an electric bus depot, the buses could charge at a time where the factory does not need additional electrical capacity.

We find these arguments persuasive, agreeing that it is likely that circumstances exist where electric capacity can safely be shared between more than one customer located upon shared infrastructure and that increased utilization of existing infrastructure that results from sharing capacity may be cost-efficient. We find it reasonable to direct PG&E and SCE to maintain records

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<sup>75</sup> PG&E Amended Clarified FSC Data Sheet, Data Dictionary tab cell B4.

<sup>76</sup> EDF Opening Comments on Next Steps Ruling at 11; TURN Opening Comments on Next Steps Ruling at 3.

of their analysis of capacity constrained infrastructure to allow future analysis of whether available capacity can be safely allocated to a subsequent FSC customer, and to evaluate the feasibility of multiple customers with an FSC on the same utility asset as a part of the Standard Offer. As noted in Section 3.4.1, it is reasonable to assume that a FSC will remain in place for an average of 3 years. Accordingly, each project's infrastructure analysis should be retained for at least 3 years, not be discarded prior to the conclusion of the FSC, and shall be summarized within the report detailed in Section 9.

#### **5.10.2. When Capacity Should be Shared Among Multiple Applicants**

IOUs hold the consensus view that the full amount of unlocked capacity should be allocated to the first customer who submits a completed application.<sup>77</sup> This view risks denying significant capacity to a customer based on the speed of the IOU employee processing an application, or on the basis of one customer submitting an application slightly later than the prior applicant. PG&E notes that over 90% of the applications it receives are incomplete and that most applications require three to four back and forth discussions to obtain the needed information,<sup>78</sup> providing ample opportunity for inconsistent processing times. We find it reasonable to allow the IOUs flexibility to equally consider more than one application for the purpose of sharing unallocated capacity between two

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<sup>77</sup> PG&E June 13, 2025 Response to Transparency Ruling at 3; SCE Opening Comments on Next Steps Ruling at 14; SDG&E Opening Comments on Next Steps Ruling at 6.

<sup>78</sup> CALSTART Comment on Responses to Transparency Ruling at Attachment A, response to Calstart\_002-Q001.

customers if the applications were received within a relatively concurrent<sup>79</sup> window of time. We direct PG&E and SCE to be transparent and consistent in their criteria for establishing such a window of time and articulate that criteria within the Implementation Advice Letter.

#### **5.10.3. How Capacity Should be Shared Among Multiple Applicants**

Parties raise various possibilities for how the unlocked capacity should be shared between customers. Identified options include first-come, first-serve, proportional allocation according to customer need, and via a cluster study process.<sup>80</sup> We find it reasonable to leave the question of how to share capacity between customers to the IOUs' discretion, with the caveats that the PG&E and SCE must be transparent about their method for allocation of capacity, must not favor any customer class, and must not reduce the capacity of an existing Standard Offer to accommodate later applications. The method used for capacity allocation between multiple customers shall be articulated by PG&E and SCE within the Implementation Advice Letter.

#### **5.10.4. Initial Engineering Evaluation, Customer Communications, and IOU Optimization of LLP within Step 2**

D.24-09-020 established Step 2 as Engineering and Design. PG&E and SCE diverge in the initial level of project study prior to communicating with the customer, with PG&E performing an initial engineering evaluation of load

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<sup>79</sup> Enphase Opening Comments on Next Steps Ruling at 11.

<sup>80</sup> Enphase Opening Comments on Next Steps Ruling at 5; EDF Reply Comments on Next Steps Ruling at 8; VGIC Reply Comments on Next Steps Ruling at 6.



profile and load ramp for all customers.<sup>81</sup> SCE differs by performing a full engineering study for customers whose load exceeds 500 kW,<sup>82</sup> and the smallest project enrolled within the LCMS has a projected demand that is over three times that 500 kW threshold.<sup>83</sup>

If this initial engineering evaluation shows that customer load will exceed available local distribution capacity, PG&E contacts the customer to verify that they are willing and able to modify their load profile before moving to a full power flow study. PG&E's approach has the benefit of conserving engineering resources for projects that are ready to move forward. We find PG&E's approach reasonable and direct PG&E and SCE, within the Standard Offer, to pursue the approach of conducting an initial engineering evaluation to assess ability and communicating with the customer to verify interest before conducting a full study.

SCE's approach ensures that they will not move forward with offering a FSC unless there are periods of time within each season where the customer can be provided their full desired capacity.<sup>84</sup> We find SCE's approach of not providing a FSC unless there are periods throughout the year where the customer can be provided full capacity overly restrictive for a Standard Offer and follow PG&E's policy of offering a FSC to customers that can realize benefits

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<sup>81</sup> PG&E June 13, 2025 response to Transparency Ruling at 2.

<sup>82</sup> SCE June 13, 2025 response to Transparency Ruling at 2.

<sup>83</sup> SCE FSC Participant Data at cell P7.

<sup>84</sup> SCE June 13, 2025 response to Transparency Ruling at 2.

even in the absence of a period of full capacity for all seasons. This policy maximizes the amount of capacity that can be unlocked using FSCs.

We direct PG&E and SCE to extend the FSC option to all customers where there is both a customer and ratepayer benefit, even if there is a period of the year when the customer cannot have their full requested demand served. We clarify that ratepayer benefits are a guiding principle and that the IOU is not required to demonstrate cost-efficiency for each individual project.

Both SCE and PG&E have optimized their LLP design to provide a customer with as much power as possible, striving to meet their full requested demand. Party comment establishes, though, that some customers are more sensitive to the availability of a minimum daily level of energy.<sup>85</sup> We find it reasonable to require PG&E and SCE to ask whether a Standard Offer customer would prefer optimization of their LLP for power or for energy. We clarify that the IOU is not compelled to optimize the customer's LLP for energy.

In the Standard Offer pathway for Step 2, we direct PG&E and SCE to perform an engineering evaluation that compares customer load profile and load ramp to distribution capacity prior to performing a full power flow study. In cases where this engineering evaluation identifies insufficient capacity and the customer application indicates interest in a FSC, the IOU is directed to contact the customer. In this customer contact, the IOU is directed to confirm that the customer (1) is willing and able to modify their load profile and (2) establish

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<sup>85</sup> TMH Opening Comments on Next Steps Ruling at 9.

whether the customer prefers power optimization or energy optimization in the design of their LLP.

#### **5.10.5. Integration of Load and Generation in Engineering Evaluation and Analysis**

Both PG&E and SCE confirm that LLPs are available for customers with existing and planned generation,<sup>86</sup> and that the presence of such generation does not alter their methodology for computing site load. SCE encourages generation and factors it into their engineering process, while PG&E disregards generation both in existing operation and in concurrent applications, noting that the customer can use that generation to offset load at their discretion.<sup>87</sup>

Two parties note that on site generation is likely to be desired as most load customers likely cannot significantly alter their operations and would use supplemental power sources (e.g., on site storage), and that customers installing DERs are well-positioned to take advantage of FSCs.<sup>88</sup> The majority of parties support the continued allowance of generation in conjunction with FSCs. At a minimum, some parties feel that FSC customers should be allowed non-exporting generation,<sup>89</sup> and EDF advocates for allowing dual enrollment in FSCs and Limited Generation Profiles.<sup>90</sup>

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<sup>86</sup> PG&E's June 13, 2025 Response to Transparency Ruling at 6; PG&E's June 13, 2025 Response to Transparency Ruling at 4-5.

<sup>87</sup> PG&E June 13, 2025 Response to Transparency Ruling at 6.

<sup>88</sup> IREC Opening Comments on Next Steps Ruling at 14; EDF Opening Comments on Next Steps Ruling at 13.

<sup>89</sup> Critical Loop Opening Comments on Next Steps Ruling at 5.

<sup>90</sup> EDF Opening Comments on Next Steps Ruling at 16.

We note that the Commission has directed the IOUs to work toward offering a single, streamlined process to customers requesting both load and generation.<sup>91</sup> We find it reasonable that the Standard Offer process considers on site generation as a part of its engineering evaluation whether it be existing or planned, non-exporting or exporting.

We differentiate between photovoltaics without onsite energy storage and generation as a broader category. While the customer can use any generation to offset load, photovoltaics without storage have a regular level of output that is well characterized and modeled for the purposes of the Integration Capacity Analysis (ICA). We direct PG&E and SCE to incorporate the output of photovoltaics for customers without onsite storage into their engineering evaluation, to describe the process used for this incorporation in the Implementation Advice Letter, and to continue working toward offering a single, streamlined process to customers requesting both load and generation.

#### **5.11. Modification of a Standard Offer LLP**

Parties raise multiple issues related to the modification of the LLP associated with an executed FSC.

##### **5.11.1. Curtailing Standard Offer Capacity for Safety, Reliability, or Insufficient Energy Supply**

Both PG&E<sup>92</sup> and SCE<sup>93</sup> assert the ability to deenergize a customer due to the customer's failure to adhere to the LLP set out by the respective IOU. PG&E

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<sup>91</sup> Resolution E-5165 at Ordering Paragraph 2.

<sup>92</sup> PG&E May 30 response to Transparency Ruling at Attachment A.

<sup>93</sup> SCE Advice Letter 5138-E at 9.

further asserts the ability to hold the FSC customer liable for the costs of repair to both PG&E and customer-owned facilities damaged by the FSC customer's lack of adherence to their LLP.<sup>94</sup> Parties recognize that the load service rules already indicate that customers may still be subject to curtailment or shut-off even when offered an LLP, and agree that this should remain the case.<sup>95</sup> We note that IOUs have clear authority to curtail load for reasons related to safety and reliability under Tariff Rule 11<sup>96</sup> and insufficient supply under Tariff Rule 14.<sup>97</sup>

Parties emphasize that customers need assurance that the capacity provided by their approved LLPs will not be unilaterally reduced without their consent, as modifications to the agreed-upon load limits would cause uncertainty, could cause significant economic damage, and would be more disruptive than reductions in generation capacity.<sup>98</sup> Parties further note that FSCs present nuanced opportunities beyond the traditional "all or nothing" curtailment options.<sup>99</sup>

The record indicates that curtailment in existing PG&E and SCE offerings, however, has been limited to a single instance due to erroneous information. This instance resulted in closer coordination between SCE's internal departments,

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<sup>94</sup> PG&E May 30 response to Transparency Ruling at Attachment A.

<sup>95</sup> IREC Opening Comments on Next Steps Ruling at 17, 31; EDF Opening Comments on Next Steps Ruling at 10 and 14; PACT Opening Comments on Next Steps Ruling at 12.

<sup>96</sup> PG&E Tariff Rule 11 at 9-12.

<sup>97</sup> PG&E Tariff Rule 14 at 1-2.

<sup>98</sup> Enphase Opening Comments on Next Steps Ruling at 6-7; EDF Opening Comments on Next Steps Ruling at 10.

<sup>99</sup> EDF Opening Comments on Next Steps Ruling at 17.

helping to prevent future curtailment instances.<sup>100</sup> We expect that any future curtailment of Standard Offer FSCs will be consistent with the rationale and processes that have historically been used for Tariff Rule 11 and 14 curtailments.

We decline to impose restrictions on curtailment as the IOUs are already obligated to serve customers in a non-discriminatory fashion.<sup>101</sup> We do find it reasonable to direct PG&E and SCE to collect and retain data for all curtailment incidents affecting Standard Offer customers and report that data as detailed in Section 9 below.

#### **5.11.2. Modifying LLP to Reflect Annual Capacity Reassessment**

PG&E and SCE take similar approaches to providing their FSC customers the opportunity to modify an established LLP. SCE performs an annual assessment with the aim of identifying additional capacity and revising the LLP. PG&E is willing to perform a similar assessment upon request.<sup>102</sup> The record does not indicate whether these assessments have resulted in additional capacity, or whether that capacity is significant. We find it reasonable to direct PG&E and SCE to allow for an annual review of capacity for a customer's Standard Offer FSC, upon request and payment by the customer of any additional expense incurred in performing such a review. PG&E and SCE shall include a description of their process for requesting an annual capacity review in the Implementation Advice Letter.

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<sup>100</sup> SCE June 13, 2025 response to Transparency Ruling at 7.

<sup>101</sup> Public Utilities Code Section 453.

<sup>102</sup> PG&E June 13, 2025 response to Transparency Ruling at 5.

If PG&E or SCE identifies significant additional capacity in the course of its normal utility operations,<sup>103</sup> it should offer that additional capacity to existing Standard Offer customers without requiring customer payment for its normal utility operations.

**5.11.3. Modifying LLP on a Limited Term,  
Ad Hoc Basis**

PG&E will currently assess whether projected load, operational, and weather conditions allow for a FSC customer to temporarily increase the capacity values in their LLP.<sup>104</sup> This assessment occurs in response to a customer request corresponding to a fixed window of time, such as for a holiday peak, scheduled event, or special operational need. This assessment can only be conducted within the timeframe of a typical weather forecasting window, and is memorialized by a LLL that reflects the window of time and LLP values. There is no record of SCE providing this sort of assessment.

We find it reasonable to direct PG&E and SCE to allow for an ad-hoc review of available capacity within the weather forecasting window, upon customer request and payment by the customer of any additional expense incurred in performing such a review. PG&E and SCE shall include a description of their process for requesting an ad-hoc capacity review in the Implementation Advice Letter.

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<sup>103</sup> Normal utility operations refers to activities that the IOU would undertake in the absence of a customer electing to take service under a FSC.

<sup>104</sup> PG&E June 13, 2025 response to Transparency Ruling at 5-6.

### **5.12. Customer Enrollment Utilization of a Standard Offer Shall Not Affect Energization Queue Positions**

We clarify that customers utilizing a Standard Offer shall not have any change in their energization queue positions and that the IOU shall not change the prioritization of a capacity project based on customer participation in a Standard Offer. As the Standard Offer is a bridging solution that is offered only while the capacity is constrained, it should not impact the customer queue position or the capacity project prioritization.

### **6. Standard Offer Flexible Service Connection Technical Elements**

California's two FSC offerings and the recent development of technical standards provide a baseline set of technical elements. The guiding principles we use in setting the technical elements for the Standard Offer are assuring safety while promoting speed and scale.

PG&E's LLL and SCE's LCMS offerings diverge in the approach that they take to ensure that enrolled customers remain within the IOU authorized capacity. SCE's LCMS utilizes a more directive approach, which requires SCE's approval of both the equipment and system design<sup>105</sup> and commissioning of the installed system,<sup>106</sup> while PG&E has a more efficient approach, not imposing equipment requirements<sup>107</sup> and using Advanced Metering Infrastructure (AMI)

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<sup>105</sup> SCE Form 16-332 at 1.

<sup>106</sup> SCE Opening Comments on Next Steps Ruling at 5, 12.

<sup>107</sup> PG&E Opening Comments on Next Steps Ruling at 8.



data to flag any excess power used by a customer for later review and customer communications.<sup>108</sup>

Our review of the record shows that PG&E's more efficient "trust and verify" approach<sup>109</sup> has safely unlocked capacity at higher levels than SCE's.

#### **6.1. Method for Determining Customer Load in the Standard Offer**

Both PG&E<sup>110</sup> and SCE<sup>111</sup> clarify that the process used for determining customer load is unchanged between the standard energization process and the process used for FSC offerings.

SCE states that it utilizes either a detailed demand estimate schedule or other methods such as similar facilities or demand based on square footage for determining the requested capacity level for a new project.<sup>112</sup> PG&E determines the load using historical demand from similar customers,<sup>113</sup> matching customer provided profiles against forecasting load profiles,<sup>114</sup> or load density (watts/square foot) for similar occupancy types.<sup>115</sup>

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<sup>108</sup> PGE June 13, 2025 response to Transparency Ruling at 10.

<sup>109</sup> PG&E Opening Comments on Next Steps Ruling at 4.

<sup>110</sup> PGE June 13, 2025 response to Transparency Ruling at 7.

<sup>111</sup> SCE's June 13, 2025 Response to Transparency Ruling at 5.

<sup>112</sup> SCE's May 30, 2025 Response to Transparency Ruling at 2-3.

<sup>113</sup> PG&E June 13, 2025 response to Transparency Ruling at 7.

<sup>114</sup> PGE June 13, 2025 response to Transparency Ruling at 3.

<sup>115</sup> PG&E June 13, 2025 response to Transparency Ruling at 7.

### **6.1.1. Tariff Rules and Defined Terms**

Each electrical IOUs maintains an Electric Tariff Rule 2 that provides a description of the types of service that are offered. Rule 2 specifies the minimum and maximum levels of load appropriate to various service levels.<sup>116</sup> Parties note inconsistency between the IOUs' Rule 2 discussion of load, with PG&E defining connected load and the other Large IOUs omitting the term.<sup>117</sup> PG&E describes connected load as the sum of the rated capacities of all of the customer's electric utilization equipment that is served through one metering point and that may be operated at the same time.<sup>118</sup> The record does not indicate that connected load has any bearing on either PG&E or SCE's assessment of customer load.

PG&E clarifies that metered demand is the term that represents a reasonable expectation of the site load from equipment that will run simultaneously and is derived from the historical demand of similar customers.<sup>119</sup> Metered demand is not the same as connected load.<sup>120</sup>

Our understanding of the difference between connected load and metered demand is that connected load refers to the sum of all loads that are capable of being operated simultaneously while metered demand refers to an engineering judgement of the loads that the electric meter will see as a result of the customer's connected equipment. It is our understanding that metered demand

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<sup>116</sup> PG&E Tariff Rule 2 at 8-9.

<sup>117</sup> EDF Opening Comments on Next Steps Ruling at 16; Enphase Opening Comments on Next Steps Ruling at 5.

<sup>118</sup> PG&E Rule 2 at 20.

<sup>119</sup> PG&E's June 13, 2025 Response to Transparency Ruling at 6-7.

<sup>120</sup> PG&E's June 13, 2025 Response to Transparency Ruling at 6, fn 2.

is the parameter that PG&E compares to available capacity to determine whether the customer can be served with existing electrical infrastructure.

The record describing how SCE and PG&E compute customer load is underdeveloped. We find it reasonable that SCE and PG&E provide a fulsome description of the load determination process and the terminology necessary to adequately describe the steps taken. We direct SCE and PG&E to include a fulsome description of the process used to compute customer load within the Implementation Advice Letter and to update their electric Tariff Rules to include definitions for the necessary terminology to accurately describe this process. If there are differences in process or terminology, the description within the Implementation Advice Letter shall articulate with specificity those differences and the rationale that supports differing processes between the two IOUs. We encourage PG&E and SCE to utilize common terminology and consistent processes within their Tariff Rule 2 where possible.

## **6.2. Methods for Determining Grid Capacity in the Standard Offer**

### **6.2.1. Lessons Learned from Limited Generation Profile**

The concept of Flexible Connection is allowing the customer to match their site's power levels to the amount of power that the grid can safely handle. While parties generally supported leveraging the work that went into developing Limited Generation Profiles (LGP), some expressed reservations that the existing

LGP structures would be either overly prescriptive<sup>121</sup> or insufficiently granular.<sup>122</sup>

Other parties noted that the LGP construct may not be suitable for energization customer needs, noting that customers who will likely be interested in FSCs may not be prepared for the same level of complexity in their electricity tariffs as LGP customers<sup>123</sup> and suggesting that LLPs offer simpler options that accommodate a broader range of customer preferences and energy management strategies.<sup>124</sup>

PG&E recommended no reliance on the LGP record in R.17-07-007.<sup>125</sup> SCE noted that the LGP construct relies upon a mature and standardized series of screening processes that have no equivalent in energization and expressed concern that using a similar process for FSCs could affect safety and reliability.<sup>126</sup>

We find party views on the lack of directly transferable lessons from the LGP process convincing and do not rely upon any elements of the LGP process for the Standard Offer.

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<sup>121</sup> EDF Opening Comments on Next Steps Ruling at 9-10.

<sup>122</sup> Clean Coalition Opening Comments on Next Steps Ruling at 5.

<sup>123</sup> EDF Opening Comments on Next Steps Ruling at 16.

<sup>124</sup> EDF Opening Comments on Next Steps Ruling at 9-10.

<sup>125</sup> PGE Opening Comments on Next Steps Ruling at 6-7.

<sup>126</sup> SCE Opening Comments on Next Steps Ruling at 9-10.

### **6.2.2. Utilization of the Load ICA Tool for Standard Offer Capacity Values**

Parties agreed that the Load ICA provided by PG&E and SCE is not currently an investment grade tool<sup>127</sup> citing inherent limitations,<sup>128</sup> a lack of accuracy,<sup>129</sup> and a lack of incorporation into planning and screening processes.<sup>130</sup>

PG&E and SCE estimate the end of 2027<sup>131</sup> and fourth quarter of 2026, respectively, as the earliest point where they anticipate that the Load ICA will be ready for direct use in their planning and screening processes.<sup>132</sup> Both PG&E and SCE maintain that the design of the LLP is best addressed by having customers discuss options directly with the IOU engineers. Other parties agree with this assessment, noting that IOUs utilize their own internal data<sup>133</sup> and the only consistent method to get up-to-date information is to submit and pay for a customer application.<sup>134</sup>

We find the party arguments convincing and do not rely upon the Load ICA for Standard Offer capacity values at this time.

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<sup>127</sup> PACT Opening Comments on Next Steps Ruling at 8.

<sup>128</sup> IREC Opening Comments on Next Steps Ruling at 19.

<sup>129</sup> IREC Opening Comments on Next Steps Ruling at 21-23.

<sup>130</sup> PGE Opening Comments on Next Steps Ruling at 7; VGIC Opening Comments on Next Steps Ruling at 12.

<sup>131</sup> PG&E Opening Comments on Next Steps Ruling at 8.

<sup>132</sup> PGE Opening Comments on Next Steps Ruling at 7; VGIC Opening Comments on Next Steps Ruling at 12.

<sup>133</sup> VGIC Opening Comments on Next Steps Ruling at 11.

<sup>134</sup> Clean Coalition Opening Comments on Next Steps Ruling at 4.

### **6.2.3. Normal and Emergency Equipment Capacity Ratings**

The components that make up the electric distribution grid each have a normal capacity rating and an emergency capacity rating.<sup>135</sup> A piece of equipment's normal and emergency ratings convey how much power the equipment can nominally carry on an indefinite basis (normal rating) or on a short-term basis, e.g., several hours (emergency rating). Using emergency ratings beyond the set time period could result in equipment damage. As long as actual power stays below the emergency rating limits (for level and duration), the equipment will not be damaged. The normal capacity is typically established by its thermal capacity.<sup>136</sup>

The record of this proceeding is underdeveloped with respect to the methodology used by the IOUs to compute normal and emergency ratings for electrical distribution equipment. PG&E and SCE shall explain how they determine the normal and emergency ratings, articulate the duration of the emergency ratings, and include their normal and emergency rating standards for relevant equipment (e.g., conductor, transformer, etc.) within the Implementation Advice Letter.

Much of the time, the equipment runs cooler (e.g., weather below historical maximum temperatures, presence of wind) and the equipment has more actual capacity than its nominal normal rating, making the normal ratings conservative. Even if conditions were such that the equipment's normal rating equaled its

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<sup>135</sup> PG&E June 13, 2025 Response to Transparency Ruling at 3.

<sup>136</sup> IREC Comment on Responses to Transparency Ruling at 8.

actual, real-time rating, any exceedance of specified load limits would likely dip into the equipment's emergency rating range for only a few hours.<sup>137</sup>

#### **6.2.4. Buffer Values on Normal Capacity Ratings**

Both SCE and PG&E assume that the controlled loads on a FSC site will remain within their LLP and assess the capacity that is available to a site based upon the normal capacity of the most constrained electrical component. SCE diverges from PG&E's approach by adding an additional 5% reduction, or "buffer value". SCE justifies this buffer due to the experimental nature of the LCMS pilot, but is open to revisiting it in the future.<sup>138</sup>

Neither PG&E nor SCE are comfortable with increasing site capacity beyond their current practice of using normal capacity without a buffer or applying a 5% buffer to normal capacity, respectively.<sup>139</sup> Non-IOU parties are unified in their desire for consistent standards on buffer values.<sup>140</sup>

Multiple parties note the lack of any issues presented by the approximately 100 customers where PG&E has used equipment's normal capacity ratings without an additional buffer and the fact that the majority of operating conditions allow for exceedance of normal capacity without thermal issue; as

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<sup>137</sup> IREC Comment on Responses to Transparency Ruling at 8.

<sup>138</sup> CALSTART opening comments on Responses to Transparency ruling at 21, citing SCE response to CALSTART-001, Question 02.

<sup>139</sup> PG&E June 13, 2025 Response to Transparency Ruling at 9; SCE June 13, 2025 Response to Transparency Ruling at 7.

<sup>140</sup> CalCCA Comments on Responses to Transparency Ruling at ii.3.8-10; CALSTART Comments on Responses to Transparency Ruling 20-21; IREC Comments on Responses to Transparency Ruling at 7-9.

such, they request that no buffer value be allowed until concrete evidence and data are presented that substantiate the need for a buffer value.<sup>141</sup>

We find it reasonable to utilize normal capacity ratings without a buffer value. We direct PG&E and SCE to utilize normal capacity ratings without a buffer value when determining LLP capacity for the Standard Offer.

#### **6.2.5. Additional Limitations Imposed by Emergency Capacity Ratings**

In addition to assessing normal equipment capacity, PG&E evaluates the equipment loading that would occur if the FSC customer failed to adequately control their load. PG&E's LLP is designed such that a customer's failure to comply might result in exceeding normal ratings but not emergency ratings.<sup>142</sup>

We find it reasonable for PG&E and SCE to assess the effect that loss of control would have for those Standard Offer customers who are using manual or uncertified controls and have not installed protective devices. We direct PG&E and SCE to design their Standard Offer LLPs such that IOU equipment will stay within their emergency capacity rating if a customer using manual or uncertified controls fails to control site load.

### **6.3. Technical Elements Related to Load Control**

#### **6.3.1. There is No Need for a Specific Technical Load Control Solution**

Multiple parties note that dictating a technical solution is unnecessary given that simple load scheduling may be sufficient and that dictation of a

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<sup>141</sup> IREC Opening Comments on Next Steps Ruling at 18; PAO Comments on Responses to Transparency Ruling at 2.

<sup>142</sup> PG&E June 13, 2025 response to Transparency Ruling at 8-9.



specific technical solution may introduce costs that inequitably reduce the number of customers that could benefit from FSCs.<sup>143</sup>

SCE's LCMS pilot required the installation of a SCE approved PCS, approval of that system design, and commissioning of that system.<sup>144</sup> Parties have indicated that the process of getting PCSs tested and approved has been lengthy and costly, and that SCE has moved<sup>145</sup> from a bespoke testing process for each PCS model to reliance upon equipment that has been certified to comply with the UL 3141 standard.<sup>146</sup> Further discussion of this standard is given in Sections 6.3.3-6.3.5 below.

PG&E's LLL offering does not require automated controls. While PG&E reserves the right to deenergize facilities that violate their load limit and levy charges equal to the cost of any damage incurred<sup>147</sup>, it does not mandate any specific technical solution or commissioning of the solution selected by the customer.

PG&E's experience shows that there is no need to dictate the method of load control or require equipment commissioning for the Standard Offer. We find it reasonable to allow Standard Offer customers to choose the method of

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<sup>143</sup> PACT Opening Comments on Next Steps Ruling at at 4. PGE Opening Comments on Next Steps Ruling at 8.

<sup>144</sup> SCE Form 16-332 at 1-2.

<sup>145</sup> SCE Opening Comments on Next Steps Ruling at 11; CALSTART Opening Comments on Next Steps Ruling at 11.

<sup>146</sup> SCE Opening Comments on Next Steps Ruling at 7, "UL 3141 Issue #2 was published in October 2024 and now serves as the national standard for certification of PCS".

<sup>147</sup> PG&E May 30 response to Transparency Ruling at Attachment A.

load control that best meets their needs. We direct PG&E and SCE to allow customers to choose their preferred method of load control and clarify that PG&E and SCE shall not require commissioning of the customer's chosen solution unless it includes an uncertified power control system and is requesting safe harbor treatment.

PG&E's LLL offering reserves the right<sup>148</sup> to impose physical assurance or protective equipment. PG&E shall include within the Implementation Advice Letter a description of the physical assurance and protective equipment that has been used in LLL projects, the circumstances that necessitated its use, and the number of projects that have required either physical assurance or protective equipment. We anticipate that the incidence of these measures in the Standard Offer will be comparable to that which has been experienced in the LLL offering and direct the IOUs to maintain documentation on which sites needed such measures for at least three years.

**6.3.2. Compliance Can be Achieved by  
Advanced Metering Infrastructure,  
Clear Liability, and Customer  
Education**

Compliance with capacity limits has historically been achieved by the IOU ensuring that the customer equipment won't draw more power than expected, utilizing known equipment sizing or protective relays. With its LLL offering, PG&E instead utilizes an automated compliance tracking system that leverages the data provided by Advanced Metering Infrastructure (AMI) to trigger a

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<sup>148</sup> PG&E May 30, 2025 response to Transparency Ruling at 2 and Attachment A page 1, PG&E amended FSC Data sheet; Data Dictionary tab cell B43.

weekly email message to its engineering staff if a customer exceeds their allotted capacity. The engineering staff then reviews historical data and contacts the customer if the data confirm that there has been an exceedance. PG&E reports that this arrangement has been sufficient,<sup>149</sup> noting an infrequent need to contact customers and their subsequent adherence to the agreed upon LLP.<sup>150</sup>

PG&E's experience shows that customers respond to a clear articulation of liability if LLP values should be exceeded. We find it reasonable for PG&E and SCE to hold Standard Offer customers liable for damage to IOU equipment resulting from exceedance of the Standard Offer LLP. We direct PG&E and SCE to incorporate provisions in the Standard Offer that clearly assign liability for damages to IOU equipment resulting from the exceedance of the approved LLP to the Standard Offer customer.

We find it reasonable for PG&E and SCE to utilize AMI infrastructure to monitor compliance with Standard Offer LLPs. We recognize that the email and manual review process used by PG&E may not be ideal for achieving scale or compatible with different IOU systems and find it reasonable to allow each IOU latitude to create divergent processes to move from AMI data to customer notification of Standard Offer LLP exceedance. We direct PG&E and SCE to utilize AMI data as the method for determining customer compliance with the Standard Offer terms.

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<sup>149</sup> PG&E June 13, 2025 response to Transparency Ruling at 10.

<sup>150</sup> PG&E amended FSC Data sheet; Data Dictionary tab, cell B48.

We find that the customer education approach taken by PG&E is effective and appropriately balances risk with customer capabilities. We direct IOUs to utilize customer education as the first remediation step if a customer should exceed their Standard Offer LLP in a way that does not create a safety, reliability, or shortage of supply concern. Nothing in this direction should be interpreted as superseding the IOUs authority to enforce terms found in their Electric Tariff Rules 11 or 14.

**6.3.3. Safe Harbor for Load Controlled by Certified or Approved Electronic Systems**

Parties do not agree that there is a need to impose specific technical solutions, and PG&E's LLL experience has shown that a static FSC offering can be safely made without requiring specific technical solutions, provided that the IOU is permitted to curate the population of participating customers and decline FSCs where grid conditions or customer characteristics pose heightened risk<sup>151</sup>. As there is consensus on which technical solution would be sufficient if one were needed, we find that providing a safe harbor for load controlled by systems using this solution is likely to reduce the administrative burden of providing a Standard Offer. Safe harbor treatment means that controlled load behind a certified or approved Power Control System is not counted against the normal or emergency capacity ratings of IOU equipment. Further, providing this safe harbor is likely to increase the number of customers that can be provided a

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<sup>151</sup> PG&E PD Opening comments at 2.

Standard Offer, given the finite engineering resources available for evaluating customer applications.

The majority of parties state<sup>152</sup> that the installation of a PCS that has been certified by a Nationally Recognized Test Lab (NRTL) to comply with the second edition of the UL 3141 standard's Power Import Limitation function (UL 3141 PCS) is sufficient to ensure that customers operate within the power limits specified in their LLP. Given parties' extensive response in support of the standard, we find it reasonable to rely upon UL 3141 PCS certification for load control. This reliance provides a safe harbor. We find it reasonable that customer load installed under the control of a certified UL 3141 PCS shall not comprise an increase in connected or metered load provided that the UL 3141 PCS setpoint does not exceed the total amount of other connected or metered loads. We find that customer equipment installed within a UL 3141 PCS does not comprise a meaningful change in the amount or character of load for existing customers provided the customer stays within the previously authorized capacity.

UL 3141 provides a standardized format for scheduling LLP values. We find it reasonable to require that PG&E and SCE provide the LLP values to the customer electronically, in the format specified by UL 3141 Edition two Annex A.

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<sup>152</sup> AAI Opening Comments on Next Steps Ruling at 4; CALSTART Opening Comments on Next Steps Ruling at 10; SDG&E Opening Comments on Next Steps Ruling at 4; EDF Opening Comments on Next Steps Ruling at 12; Enphase Opening Comments on Next Steps Ruling at 4; CL Opening Comments on Next Steps Ruling at 3. TMH Opening Comments on Next Steps Ruling at 10.; PACT Opening Comments on Next Steps Ruling at 9.; SCE Opening Comments on Next Steps Ruling at 11.; VGIC Opening Comments on Next Steps Ruling at 13.

Multiple parties<sup>153</sup> note that there may be cases in which a specific equipment is not available with a UL 3141 PCS and suggest that customers be allowed to use other mutually agreeable solutions such as uncertified PCSs, software controls, Real-Time Automation Controllers (RTAC), and relays if the Standard Offer customer elects to rely upon automated solutions. We find this argument persuasive and allow customers and utilities to use mutually agreeable solutions to access safe harbor treatment when equipment with a UL 3141 PCS is unavailable or infeasible for the customer's needs. It is reasonable to allow PG&E and SCE to require that uncertified power control systems successfully undergo system commissioning in order for their controlled load to be provided safe harbor treatment.

#### **6.3.4. Availability of UL 3141 PCS Enabled Equipment**

There is a consensus from parties responding to this ruling question that certified equipment is either currently available or planned to be available by mid-2025.<sup>154</sup> IREC notes that Commission decision supporting the use of certified PCSs would be a crucial market driver and should help clarify ongoing confusion around standards for these applications. We find it reasonable to

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<sup>153</sup> AAI Opening Comments on Next Steps Ruling at 4, IREC Opening Comments on Next Steps Ruling at 25.

<sup>154</sup> CALSTART Opening Comments on Next Steps Ruling at 11, Critical Loop Opening Comments on Next Steps Ruling at 4, Enphase Opening Comments on Next Steps Ruling at 4, PACT Opening Comments on Next Steps Ruling at 9, SDG&E Opening Comments on Next Steps Ruling at 5, Enphase Reply Comments on Next Steps Ruling at 4, IREC Opening Comments on Next Steps Ruling at 19.

assume that Standard Offer customers will be able to find UL 3141 PCS certified equipment for the majority of their needs.

#### **6.3.5. Response Times for UL 3141 PCS or other Mutually Agreeable Control Systems**

Parties assert<sup>155</sup> that systems utilizing standard UL 3141 PCS parameters for response times have a negligible effect on equipment lifespan, citing the findings of federal research.<sup>156</sup> We find the party discussion and federal research convincing, and find that UL 3141 parameters<sup>157</sup> for power control system response time are sufficient to prevent significant adverse impacts on distribution equipment lifespan. We find it reasonable to use UL 3141 power control system response parameters for the Standard Offer and direct any IOUs providing a Standard Offer to apply these parameters to UL 3141 or mutually agreeable PCS used to control site load.

#### **6.4. Telemetry is Not Required for Load Visibility**

Telemetry is not required for PG&E's LLL offering. Parties assert that FSC agreements (FSCAs) should be made at the meter level, where a facility interfaces with the utility, not behind-the-meter at the device level.<sup>158</sup> PG&E

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<sup>155</sup> Enphase Opening Comments on Next Steps Ruling at 6; IREC Reply Comments on Next Steps Ruling at 17-18.

<sup>156</sup> The Commission takes official notice of the Pacific Northwest National Laboratory, *Evaluating the Thermal Impacts of Inadvertent Export on Service Transformers*, at 17 (Oct. 2024).

<sup>157</sup> The Commission takes official notice of the UL 3141 Second Edition Standard, at 8.2.3.

<sup>158</sup> Clean Coalition Opening Comments on Next Steps Ruling at 12.

confirms that this is consistent with their offering, stating that the Load Limit applies at the customer point of interconnection.<sup>159</sup>

We find party arguments and the example provided by PG&E's years of successful LLL operations convincing and direct that telemetry shall not be required as a part of the Standard Offer. This finding does not alter the Rule 21 requirement for telemetry on generation systems larger than 1 MW installed at a site taking service under the Standard Offer.

## **7. Process and Tariff Improvements Supporting the Standard Offer**

The engineering evaluation that a Standard Offer FSCA is based upon is intended to be the first part of Energization Step 2 – Engineering and Design. As this pathway was not contemplated when D.24-09-020 established timeline targets, we find it reasonable to establish targets for the completion of IOU dependent steps within the Standard Offer and direct PG&E and SCE to track their performance relative to these targets.

### **7.1. Average Time Target for IOU Controlled Portions of the Standard Offer**

The IOU portions of the Standard Offer process begin at the conclusion of Energization Step 1, when the customer application is deemed complete. PG&E states that the process for conducting a preliminary capacity assessment is completed within 30 days.<sup>160</sup> The work to conduct a preliminary capacity assessment is substantively similar to that of the initial engineering evaluation process, with the engineering evaluation adding the need to compare customer

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<sup>159</sup> PG&E June 13, 2025 response to Transparency Ruling at 2.

<sup>160</sup> PG&E June 13, 2025 response to Transparency Ruling at 16.



load shape and load ramp value to that capacity. We find it reasonable to set the target timeline between the customer application being deemed complete and the initial customer load limit conversation to an average of 30 days.

PG&E notes that the process between the initial customer load limit conversation and final determination of load limits is iterative, including customer conversations. They state that this process can add up to 30 days of additional review time.<sup>161</sup> We encourage PG&E and SCE to provide prompt replies and limit iterative discussions to those that will support the final determination of load limits. We find it reasonable to set the target timeline between the final determination of load limits to the electronic delivery of the LLP schedule file and Standard Offer agreement to 15 days. We clarify that the time targets for the customer load limit conversation and the delivery of the LLP schedule file do not alter the timelines established in D.24-09-020.

## **7.2. Tariff Improvements**

Parties have advocated for the Commission to require the utilities to work with stakeholders through a working group process to formally define the detailed energization process in a tariff, similar to how Tariff Rule 21 formally documents the end-to-end interconnection process.<sup>162</sup> Parties, however, recognize that this process may unnecessarily delay implementation of FSCs.<sup>163</sup>

Parties further assert that in order to facilitate LLPs, it would be useful to incorporate definitions that separate nameplate capacity from import-limited

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<sup>161</sup> PG&E's June 13, 2025 response to Transparency Ruling at 17.

<sup>162</sup> Opening Comments of IREC on the Commissioner's Scoping Memo and Ruling, at 5-7.

<sup>163</sup> IREC Comment on Responses to Transparency Ruling at 11.

applications<sup>164</sup> and that load management systems such as UL 3141 certified systems can run normal operations without having capacity to service 100% of the nameplate load.<sup>165</sup>

We find it reasonable to direct IOUs that provide a Standard Offer to align with PG&E's Rule 2 connected load language and to further define controlled load.

We agree that development of a dedicated Tariff Rule for the Standard Offer is incompatible with our direction in this decision for PG&E and SCE to implement the Standard Offer in the very near term. We instead direct that additional language regarding connected and controlled load be added to PG&E's Electric Tariff Rules and direct SCE to revise its Tariff Rules 2 and 3 language to be consistent with PG&E's Tariff Rules. This connected load language is detailed in Appendices D and E of this decision. PG&E and SCE shall file a Tier 1 AL consistent with this decision modifying their Tariff Rule 2 and 3 language within 15 days of the issuance of this decision.

## **8. Cost Tracking and Evaluation of the Standard Offer**

We note that the record is not sufficient to evaluate either the project level or program level cost efficiency of the IOU offerings to date. We further note that the level of IOU record keeping on current offerings would not be sufficient to assess whether all Standard Offer projects will be in the ratepayer interest. The record does not reflect the cost incurred in establishing or administering the FSC

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<sup>164</sup> IREC Opening Comments on Next Steps Ruling at 29.

<sup>165</sup> PACT Opening Comments on Next Steps Ruling at 11.

current offerings, amount of additional energy consumption enabled, or the hours in which that energy is being used. We find it reasonable to direct PG&E and SCE to track the initial costs of establishing and the ongoing costs of administering the Standard Offer, as well as the additional energy consumption enabled for each customer at an hourly level.

In order to provide a future basis for establishing and improving the cost-efficiency of the Standard Offer, we direct PG&E and SCE to track data at a sufficient level of granularity to allow the Commission to determine which individual projects are cost-efficient. This tracking, however, does not imply an obligation to assure cost-efficiency at the project level; the IOUs are instead directed to use their discretion to aim for cost-efficiency across the entirety of the Standard Offer. The specific data fields and levels of granularity required to track costs and assess cost-efficiency shall be determined in consultation with the Commission's Energy Division prior to the filing of the Implementation Advice Letter, and those data shall be listed with specificity in the Implementation Advice Letter.

We direct PG&E and SCE to file a report summarizing the costs, additional energy consumption enabled, assessment of the Standard Offer's cost-efficiency, and an assessment of the effect the Standard Offer has had upon revenue requirements. As noted in Section 2.3.1 above, the average duration of a LLL is approximately 3 years, and nearly all capacity upgrades for known LLL customers will be completed prior to 2029. This report shall be filed in this proceeding, or its successor, no later than January 15, 2029.

## **9. Data Collection and Reporting Requirements for Standard Offer Refinement**

PG&E did not keep sufficient records about FSC offerings to address many of the questions in the Next Steps Ruling.<sup>166</sup> Due to this insufficiency and based upon the LLL framework, the Commission's Energy Division has formulated a preliminary list of data fields required to be tracked for future refinement of the Standard Offer. The specific data provided by customers in their application, as well as the list of fields in Appendix C, provide a preliminary set of the data whose collection and reporting will be required to assess performance and inform future refinement of the Standard Offer. PG&E and SCE shall consult with Commission's Energy Division on which data fields at what level of granularity should comprise the final list of data to be collected for the purposes of assessing and refining the Standard Offer. This tracking is additional to the specific data fields initially provided by the Customer for each Standard Offer and those determined in consultation with the Commission's Energy Division for cost-efficiency as discussed in Section Eight. We find it reasonable for these data to be included with the Biannual reporting directed in D.24-09-020, starting with the March 31, 2027 report. We clarify that the data fields to be included regarding the Standard Offer are subject to update via resolution as detailed in Section 10 of D.24-09-020.

SCE's LCMS pilot was intended to provide insight and information demonstrating FSC ability to provide support for distribution reliability and

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<sup>166</sup> EDF Comment on Responses to Transparency Ruling at 2.

safety and to reduce delays.<sup>167</sup> In establishing this pilot, SCE provides a list of twelve program parameters to be assessed at the conclusion of the two year pilot period.<sup>168</sup> We find it reasonable for SCE to assess LCMS parameters and report on learnings from their implementation in the LCMS pilot.

SCE articulates a list of pilot learnings that it intends to evaluate at the end of the LCMS pilot period.<sup>169</sup>

We direct SCE to prepare and file a report assessing learnings associated with the parameters identified at the establishment and conclusion of its LCMS pilot, in both this proceeding and in R.21-06-017, by March 1, 2026. SCE shall update this report, no later than 90 days after the full energization of the final LCMS customer, with learnings from the 13 customers authorized to continue within the LCMS pilot after January 3, 2026.

## **10. Preliminary Capacity Assessment Process**

Parties propose that an additional action to expedite energization would be to accelerate, standardize, and streamline the options a customer has to seek estimates of power availability before investing further in detailed applications and studies.<sup>170</sup> This estimate has been referred to by parties as a “power check” and is a separate process distinct from the eight energization process steps set

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<sup>167</sup> SCE Advice 5138-E at 3.

<sup>168</sup> SCE Advice 5138-E at 8.

<sup>169</sup> SCE Opening Comments on Next Steps Ruling at 15.

<sup>170</sup> CALSTART Comment on Responses to Transparency Ruling at 2-3. CALSTART Opening Comments on Next Steps Ruling at 5.

forth in D.24-09-020. To avoid confusion between this process and the Step 2 activities, we will refer to an estimate of capacity provided prior to application as a preliminary capacity assessment, or Step 0. Consistent with current practice, Step 0 is not required unless requested by the customer, and the customer is responsible for the cost associated with this assessment.

Parties note that there is a similar estimate that the IOUs perform within energization step 2 and articulate a range of customer costs between \$110,000 and \$470,000 that are regularly required to secure this estimate.<sup>171</sup> Parties assert that a much less intensive process could yield sufficient, preliminary, and necessary estimates.<sup>172</sup> PACT also asserts that a FSC should be provided at the preliminary engineering phase, before the customer submits a complete customer application.<sup>173</sup> There is no indication that either PG&E or SCE provide a LLP at Step 0, and we decline to make this a requirement of Step 0 at this time.

SCE notes that there are a variety of online tools, including the Load ICA, that customers can use to help them make informed decisions. SCE further notes that customers can request an optional, fee-based power check engineering report.<sup>174</sup>

PG&E notes that the elements articulated for a “power check” process are very similar to PG&E’s preliminary capacity assessment.<sup>175</sup>

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<sup>171</sup> CALSTART Comment on Responses to Transparency Ruling at 9.

<sup>172</sup> CALSTART Comment on Responses to Transparency Ruling at 8-9.

<sup>173</sup> PACT Opening Comments on Next Steps Ruling at 12.

<sup>174</sup> SCE June 13, 2025 response to Transparency Ruling at 9-10.

<sup>175</sup> PG&E June 13, 2025 response to Transparency Ruling at 14.

The following sub steps are consistent across PG&E's<sup>176</sup> and SCE's<sup>177</sup> existing processes and comprise a summary of the expected process under Step 0.

Sub-step A: Customer Preliminary Capacity Request (Customer Responsibility): In this step, the customer will submit basic information, including but not limited to: expected connected load, service voltage, main breaker amp, connected load type and cut sheet, basic site map with point of connection identified, and customer preferred energization date. This is an optional step that may be appropriate for a customer to initiate when they are not ready to invest the time and resources in land procurement or a full design package without knowing that the capacity they need will be available on their desired timeline.

Sub-step B: Utility Preliminary Capacity Assessment (Utility Responsibility): The utility responds to the Customer Preliminary Capacity Request, providing an estimate of capacity available for the identified point of connection at that time. This step is done at the customer's expense but is the utility's responsibility. While a field visit may not be necessary to complete this step, it is ultimately up to the utility to determine what is required to provide an accurate estimate of capacity. Any values created for a LLP resulting from this sub-step would be subject to change pending final site design and utility conducted engineering studies as a part of Step 2 of the energization process.

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<sup>176</sup> PG&E June 13, 2025 response to Transparency Ruling at 14.

<sup>177</sup> SCE June 13, 2025 response to Transparency Ruling at 8.

Preliminary capacity assessments are a common offering within the electric utility sector<sup>178</sup> and currently being offered by both utilities that will be implementing a Standard Offer. We find it reasonable for PG&E and SCE to also formalize their preliminary capacity assessment report.

We direct PG&E and SCE, within 75 days of the issuance of this decision, to submit a Tier 2 advice letter (PCA Advice Letter) that both describes and formalizes their current preliminary capacity assessment processes. Consistent with this decision, PG&E and SCE shall, as a part of this advice letter, provide the name of their respective assessment processes, describe the analysis these processes perform to arrive at capacity estimates, and provide the historical average cost to the customer for performing these assessments. PG&E and SCE shall formalize their respective processes by providing a standardized form for collecting the required customer information and a standardized preliminary capacity assessment report. In formalizing their offerings, we encourage PG&E and SCE to align the process elements of their offerings to the extent practicable. PG&E and SCE shall coordinate the format of their PCA Advice Letter such that the process elements between the two IOUs can be easily compared and shall articulate the rationale for any divergence between the practices of the two IOUs.

The amount of time taken to provide this sort of assessment across the electrical utility sector is significantly shorter than the time taken by PG&E and

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<sup>178</sup> CALSTART Opening Comments on Next Steps Ruling at 14.



SCE.<sup>179</sup> We find it reasonable to establish a target timeline of 30 days from when PG&E and SCE receive a request for a preliminary capacity assessment until they provide the customer with the full preliminary capacity assessment results. We encourage PG&E and SCE to pursue process efficiencies that will allow them to reduce the amount of time and money that is currently required to provide a preliminary capacity assessment.

The record of this proceeding does not articulate the specific data required for processing a preliminary capacity assessment request nor the specific data provided to the customer as a part of the preliminary capacity assessment report. Accordingly, we do not require reporting of specific data here, but direct PG&E and SCE to work with the Commission's Energy Division to identify the appropriate data fields and propose their reporting as a part of the PCA Advice Letter. We clarify that the data fields to be included regarding the PCA are subject to update via resolution as detailed in Section 10 of D.24-09-020.

We note that PG&E is currently developing a tool that improves and standardizes data collection needed for automating load calculations and integrating Load ICA values. It asserts that utilizing this tool supports improved customer transparency, accelerated decision-making, and optimization of resources.<sup>180</sup> While these are compelling benefits, we note the party discussion around the current state of the Load ICA in Section 6.2.2 does not currently

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<sup>179</sup> CALSTART June 28, 2024 reply comments to ALJ ruling at 4-5, CALSTART comments on Responses to Transparency ruling at 5, PG&E June 13, 2025 response to Transparency Ruling at 16, and SCE June 13, 2025 response to Transparency Ruling at 11.

<sup>180</sup> PG&E PD Opening Comments at 7-9, Advice Letter 7490-E.

support a reliance upon the ICA. PG&E and SCE are authorized to submit a Tier 2 advice letter replacing the PCA (PCA Replacement Advice Letter) for customers located on the primary network with an ICA based tool providing equivalent or greater functionality. The PCA Replacement Advice Letter shall not be submitted prior to the IOU's completion of that tool, completion of the Load ICA refinements, and the completion of its Load ICA remediation plans stemming from D.24-10-030.<sup>181</sup> The PCA Replacement Advice Letter shall detail the alignment of the tool and PCA.

#### **10.1. Alignment with Interconnection Pre-Application Reports**

The Commission has long encouraged the utilities to work toward streamlining and integrating the processes for load and generation customers.<sup>182</sup> We note that the generation interconnection process has established pre-application report that uses similar data and processes to arrive at a reports similar to the Standard Offer preapplication capacity assessment, but at a fraction of the customer cost.<sup>183</sup> We direct PG&E and SCE to review the interconnection process as they identify preliminary capacity assessment efficiencies and to continue work toward offering customers a streamlined application process for both load and generation. We also require that PG&E and SCE explain why there is a cost difference between these two processes as a part of the advice letter that establishes the Preliminary Capacity Assessment.

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<sup>181</sup> D.24-10-030 at 165-167.

<sup>182</sup> Resolution E-5165 at Ordering Paragraph 2.

<sup>183</sup> PG&E Electric Tariff Rule 21 at 49-50.

## **11. Timeline Pause due to Upstream Capacity Constraint**

Ordering Paragraph 4 of D.24-09-020, consistent with Section 8 of that decision, directed IOUs to pause the energization target timelines once a customer has been notified that their request has triggered an upstream capacity upgrade. CALSTART argues that this direction was based on an insufficiently developed record and asserts that this policy will undermine energization timelines generally.<sup>184</sup> CALSTART states that while upstream upgrades can necessitate pauses, a new business project can and should resume in parallel, to coincide and coordinate with the expected completion of the capacity upgrade.<sup>185</sup> Section eight of D.24-09-020, however, does not require the large electric IOUs to pause the target timelines. Instead, Section 8 authorizes the large IOUs to pause the target timelines. We acknowledge that there may be circumstances warranting continued work, but the record is underdeveloped and lacking precise criteria at this time. This is a topic ripe for further exploration in this proceeding.

Under D.24-09-020, the Large IOUs have the discretion to pause the target timelines when the circumstances do not warrant continued downstream project work. In making this clarification, we encourage the large IOUs to only pause the energization timelines in cases where the upstream capacity upgrade is the limiting factor preventing the customer from prompt energization.

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<sup>184</sup> CALSTART Comments on Responses to Transparency Ruling at 17

<sup>185</sup> CALSTART Comments on Responses to Transparency Ruling at 17.

**12. Summary of Public Comment**

Rule 1.18 of the Commission's Rules of Practice and Procedure (Rules) 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. Rule 1.18(b) requires that relevant written comment submitted in a proceeding be summarized in the final decision issued in that proceeding.

Public comment was filed prior to the Next Steps ruling; it was not in response to this effort. Relevant themes from public comment include the need to include alternative energization solutions for situations where existing infrastructure is insufficient to meet energy demand for fleet applications, and the need to provide options that allow projects to move forward without a comprehensive project submission.

**13. Comments on Proposed Decision**

The proposed decision of President Alice 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. Comments were filed by CALSTART, EDF, SDG&E, TURN, IREC, Cal Advocates, CalCCA, SCE, Enphase, PG&E, Advanced Energy United(AEU), Clean Coalition, and Emerald AI on January 16, 2026, and reply comments were filed on January 23, 2026 by CALSTART, EDF, SDG&E, TURN, IREC, SCE, Enphase, PG&E, Clean Coalition, and Emerald AI.

Pursuant to Rules 14.3(c) and 14.3(d), comments are required to focus on factual, legal, or technical errors in the Proposed Decision or the comments of the

other parties with specific references to the record or applicable law. Comments that failed to do so were accorded no weight. Parties provided helpful comments on a wide range of issues, and all comments were considered carefully. In response to comments, the Proposed Decision has been revised to correct errors, clarify the decision, and maintain consistency.

In its Opening Comments, PG&E clarifies that the present enrollment in LLL reflects a small, carefully curated population whose outcomes cannot be extrapolated to all customer types and grid conditions.<sup>186</sup> PG&E further articulates some of the customer characteristics (e.g., ability to control load shape) used for weighing whether a FSC is appropriate.<sup>187</sup> Accordingly, we direct PG&E to clarify both the full set of characteristics and the evaluation criteria (e.g., load can be reduced sufficiently during high demand periods) that have allowed it to curate the LLL enrollment and achieve successful outcomes. We direct PG&E and SCE to include, within the Implementation Advice Letter, the characteristics and associated criteria that they will use to select Standard Offer participants that can achieve safe outcomes within the “trust and verify” framework. We further clarify that IOUs will retain discretion in determining which customers are appropriate candidates (i.e. can achieve safe outcomes within the framework) for the Standard Offer via application of the characteristics and criteria articulated in their Implementation Advice Letter. The IOU discretion in selecting appropriate participants for the Standard Offer

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<sup>186</sup> PG&E PD Opening comments at 2.

<sup>187</sup> PG&E PD Opening comments at 2.

enables customers discretion to control site load in a manner of their choosing without requiring IOU commissioning.

In Opening Comments, both PG&E and SCE request that the Commission defer implementation timelines. This decision directs the creation of the Standard Offer and the Preliminary Capacity Assessment processes as formalizations of existing IOU processes, clearly articulated changes to rule language, or reporting consistent with the LCMS pilot proposal.<sup>188</sup> As such, we largely decline to alter the timelines established herein. We find merit, however, in SCE's argument<sup>189</sup> that the learnings from the LCMS report should inform the Implementation Advice Letter. Accordingly, we change the time for the Implementation Advice letter from 30 days after to 60 days after decision issuance, the time for the Preliminary Capacity Assessment Advice letter from 45 days after to 75 days after the issuance of this decision, and the initial reporting of data from this decision from the September 30, 2026 filing to the March 31, 2027 filing.

In Opening Comments, PG&E asserts that establishing three uniform seasons across PG&E's territories is inconsistent with operational realities<sup>190</sup> and IREC recommends that the utilities be given flexibility to define seasons based upon a customer's location.<sup>191</sup> Other parties assert that the IOUs should be

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<sup>188</sup> SCE AL 5138-E, passim.

<sup>189</sup> SCE PD Opening Comments at 8.

<sup>190</sup> PG&E PD Opening Comments at 6.

<sup>191</sup> IREC PD Opening Comments at 13.

allowed to issue a single value FSC in order to avoid customer confusion.<sup>192</sup> We clarify that the requirement to establish standard seasons for the Standard Offer does not prevent the IOUs from modifying the season's dates if a customer's constraints require different dates, clarify that the IOUs can provide a less granular profile at the customer's request, and reiterate that the IOUs are free to provide a higher granularity than the bare minimum if site or grid conditions justify it.

In its Opening Comments, PG&E opposes the Preliminary Capacity Assessment as drafted due to (1) overlap with the ACE automation initiative currently underway and (2) duplication of application intake data collection and validation. We note that there is not sufficient record to evaluate the alignment between the ACE and the PCA and provide a pathway for providing this information and transitioning to the ACE if it can provide equivalent or greater functionality. Further, the level of IOU diligence appropriate to provide a PCA differs from that required for processing a bona fide application.

Accordingly, we clarify that the IOU is not responsible for confirming information provided by the customer in the PCA process; the IOU's role is to process the customer provided information and assess the currently available capacity that would be available at that point on the grid based upon available information.

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<sup>192</sup> EDF PD Opening Comments at 3-4, IREC PD Reply Comments at 4, Emerald AI PD Reply Comments at 7.

In Opening Comments, PG&E requests memorandum account tracking for costs associated with establishing and administering the Standard Offer.<sup>193</sup> The Standard Offer is largely a formalization of the LLL process. EDF has established<sup>194</sup> that PG&E considers the cost associated with the continued use of LLL as negligible, and this agrees with PG&E's own assessment that these solutions have no or low cost.<sup>195</sup> Accordingly, we do not provide authorization to record Standard Offer costs within memorandum accounts.

In Opening Comments, PG&E notes that utility discretion on whether to allow more than one customer to share unallocated capacity should be retained, and that it is prepared to participate in a robust effort to develop procedures and safeguards that allow for such capacity sharing.<sup>196</sup> We clarify that whether to consider more than one customer for unallocated capacity as discussed in Sections 5.10.2-5.10.4 is at the IOU's discretion and that the Commission's Energy Division is authorized to lead an effort to develop safeguards and procedures that allow for sharing of unallocated capacity.

In Opening Comments, the Large IOUs request clarity that the Standard Offer will be provided as a Commission approved form that sets out the agreement between the IOU and the customer, rather than a tariff. We provide the definition of a tariff, clarify that the Standard Offer will be provided via a Standard Form Agreement and in so doing, be placed within a Commission

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<sup>193</sup> PG&E PD Opening Comments at Appendix A, page 4.

<sup>194</sup> EDF PD Opening Comments at 4.

<sup>195</sup> PG&E Bridging Strategies Report at 8.

<sup>196</sup> PG&E PD Opening Comments at 6-7.



approved tariff, and provide this clarity throughout. The Form Agreement should be adaptable as the IOUs learn more in implementation. Utilities may work in consultation with Energy Division to update the Standard Form Agreement via Tier 2 Advice Letters as necessary.

In Opening Comments, both PG&E<sup>197</sup> and SCE<sup>198</sup> express concern with PCA reporting requirements and recommend developing a reporting structure for Step 0 that is independent from the reporting associated with Steps 1-8. While we decline to direct a dedicated reporting structure for Step 0, we clarify that the Commission's Energy Division shall have the discretion to direct the IOUs in the establishment and modification of the reportable data fields. To allow for full discussion of required fields and in consideration of the time required to deploy a new customer-facing interface,<sup>199</sup> we modify the initial reporting date for PCA data to March 31, 2027.

In Opening Comments, both PG&E and SCE advocate for IOU discretion to apply more conservative assumptions or additional safeguards within the Standard Offer. With respect to more conservative assumptions, we reiterate that except for nontariff or detariffed service, or a deviation, authorized by statute or Commission order, a utility shall serve its California customers only at rates and under conditions contained in its tariffs then in effect,<sup>200</sup> and clarify that more conservative assumptions and the rationale for requiring them can be proposed

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<sup>197</sup> PG&E PD Opening Comments at 9.

<sup>198</sup> SCE PD Opening Comments at 2.

<sup>199</sup> PG&E PD Opening Comments at 9.

<sup>200</sup> General Order 96b, General Rule 9.2.1.

to the Commission as a deviation. With respect to additional safeguards, we clarify the IOU discretion to apply additional safeguards is retained under exceptional cases and subject to documentation requirements. PG&E is directed, within the Implementation Advice Letter, to quantify the number of LLL sites to date that have required additional safeguards and to describe, with specificity, the conditions that necessitated those safeguards.

In Opening Comments, SCE requests that the LCMS process be allowed to continue to serve customers on an interim basis until the Commission approves the Standard Offer.<sup>201</sup> We clarify that SCE is authorized to continue to serve the specified existing LCMS customers under the terms of that pilot until such time as the Implementation Advice Letter is approved.

Multiple parties<sup>202</sup> advocate for the IOUs to evaluate cost efficiency of the Standard Offer as a whole rather than on per project basis; we clarify that while data collection and retention is on a per project basis, ratepayer benefits are a guiding principle and cost efficiency should be assessed across all Standard Offer participants and does not need to be computed on a per project basis.

Multiple parties<sup>203</sup> advocate for language changes in Rule 2; we amend the language accordingly.

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<sup>201</sup> PG&E PD Opening Comments at iii, 6.

<sup>202</sup> IREC PD Reply Comments at 54, EDF PD Opening Comments at 3-4, Clean Coalition PD Reply Comments at 4.

<sup>203</sup> PG&E PD Opening Comments at 4-5, SCE PD Opening Comments at 13-14, Enphase PD Opening Comments at 8 and 10, IREC PD Opening Comments at 15.

Multiple parties<sup>204</sup> advocate for greater information with respect to normal and emergency ratings of distribution electric equipment; we direct its inclusion in the Implementation Advice Letter.

#### **14. Assignment of Proceeding**

Alice Reynolds is the assigned Commissioner and Justin Regnier and Andrew Dugowson are the assigned Administrative Law Judges in this proceeding.

#### **Findings of Fact**

1. All responding parties support establishing Standard Offer FSCs delivering firm capacity in the near-term to expedite energization when there are distribution capacity constraints.
2. Customers from both PG&E and SCE have experienced upstream distribution capacity constraints.
3. SDG&E and PacifiCorp customers are likely to encounter upstream distribution capacity constraints in the future.
4. Both PG&E and SCE have offered FSCs as an alternate pathway within energization Step 2.
5. There are no directly transferable policy frameworks from other jurisdictions that can be used as a model for the Standard Offer FSC.
6. All currently offered California FSCs are bridging solutions restricted to a single customer encountering a capacity constraint.

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<sup>204</sup> IREC PD Opening Comments at 6-7, EDF PD Reply Comments at 2.

7. PG&E has issued LLLs as a non-tariffed FSC option to over 100 customers since July of 2023.

8. PG&E's LLLs for FSCs have average duration of approximately three years.

9. Nearly all capacity upgrades for known PG&E LLL customers will be completed prior to 2029.

10. SCE enrolled eight customers within the LCMS pilot between December 2023 and 2025.

11. Static FSCs are a viable solution for customers whose IOU cannot meet their requested timeline due to an electrical capacity constraint.

12. There is no demonstrated need to establish a Standard Offer dispute resolution process at this time.

13. It is likely that circumstances exist where electric capacity can safely be shared between more than one customer located upon shared infrastructure.

14. Contacting customers to verify interest and ability to utilize the Standard Offering before performing a full engineering study has the benefit of conserving engineering resources.

15. Limiting the Standard Offer to customers who can be provided full capacity for all seasons within the year is overly restrictive.

16. Some customers are more sensitive to a minimum daily quantity of energy than they are to a maximum level of capacity delivered within a FSC.

17. On site photovoltaic generation without storage is appropriate to consider within the Standard Offer engineering evaluation.

18. Capacity curtailment within existing FSCs has only been reported in a single instance by SCE.

19. Both PG&E and SCE are willing to perform an annual assessment of capacity for existing FSC customers.

20. PG&E currently assesses, within the timeframe of a typical weather forecasting window, whether projected load, operational, and weather conditions allow for a FSC customer to temporarily increase the capacity.

21. PG&E's "trust and verify" approach to ensuring that enrolled customers remain within their agreed upon power levels has safely unlocked capacity, providing a higher number of customers and level of unlocked capacity than SCE's LCMS approach.

22. PG&E and SCE use the same process for determining customer load irrespective of whether a customer is taking service under standard energization or under a FSC.

23. Both PG&E and SCE assess the capacity that is available to a site based upon the normal capacity of the most constrained electrical component.

24. SCE reduces the normal capacity of the most constrained component by a 5% "buffer value" for FSC customers.

25. PG&E's LLP is designed such that a customer's failure to comply will not result in exceeding electrical equipment's emergency ratings.

26. There is no need to dictate the method of load control or require equipment commissioning for the Standard Offer.

27. PG&E's AMI based manual review and customer notification may not be ideal for achieving scale.

28. The customer education approach taken by PG&E is effective and appropriately balances risk with customer capabilities.

29. PG&E's LLL experience has shown that a static FSC offering can be safely made without requiring specific technical solutions.

30. There is consensus that a PCS certified to comply with the UL 3141 standard's Power Import Limitation function is sufficient to ensure that customers comply with their LLP.

31. Providing a safe harbor for load controlled by a UL 3141 system is likely to reduce the administrative burden of providing a Standard Offer.

32. UL 3141 provides a standardized format for scheduling LLP values. Standard Offer customers should be able to find UL 3141 certified equipment for the majority of their needs.

33. UL 3141 standard parameters for response time are sufficient to prevent significant adverse impacts on distribution equipment lifespan.

34. The work to conduct a preliminary capacity assessment is substantively similar to that of the initial engineering evaluation process, with the engineering evaluation adding the need to compare customer load shape and load ramp value to that capacity.

35. The time targets for the customer load limit conversation and the delivery of the LLP schedule file do not alter the timelines established in D.24-09-020.

36. Development of a dedicated Tariff Rule for the Standard Offer is incompatible with PG&E's and SCE's ability to implement the Standard Offer in the very near term.

37. The level of IOU record keeping on current offerings is not sufficient to assess either the project level or program level cost efficiency of the IOU offerings to date.

38. In establishing the LCMS pilot, SCE provided a list of twelve program parameters to be assessed at the conclusion of the two-year pilot period.

39. In ruling responses, SCE provides a list of pilot learnings that it intends to evaluate at the end of the LCMS pilot period

40. Preliminary capacity assessments are a common offering within the electric utility sector.

41. Section eight of D.24-09-020 authorizes the Large IOUs to pause the target timelines. We acknowledge that there may be circumstances warranting continued work, but the record is underdeveloped and lacking precise criteria at this time.

### **Conclusions of Law**

1. It is reasonable to direct PG&E and SCE to implement a tariffed Standard Offer FSC Form Agreement as an alternate pathway within energization Step 2.

2. It is reasonable to establish a tariffed Standard Offer FSC based on practices currently used in PG&E and SCE's offerings.

3. It is reasonable for the Standard Offer Agreement to be modified via a Tier 2 Advice Letter in consultation with Energy Division as needed.

4. It is reasonable to utilize practices from PG&E's LLL offering for the Standard Offer when there is divergence between PG&E and SCE's FSC practices.

5. It is reasonable to model the Standard Offer FSC on PG&E's LLL offering to the extent possible within SCE's processes.

6. It is reasonable to require the Standard Offer customer agreement for both PG&E and SCE to be modeled upon Scenario 2 of the LLL submitted as Attachment A of PG&E's May 30, 2025 response to the Transparency Ruling.

7. It is reasonable to authorize PG&E to continue utilizing its LLL offering for new and previously served customers until such time as the Standard Offer

8. It is reasonable to require that the Standard Offer FSC Form Agreement be provided within a tariff.

9. It is reasonable to require that PG&E and SCE add information on the Standard Offer FSC to their service application web page(s).

10. It is reasonable to require that PG&E and SCE add a check box allowing the customer to indicate interest in the Standard Offer FSC to their service application.

11. It is reasonable to require PG&E and SCE to identify the characteristics that cause a customer to be an ideal candidate for the Standard Offer FSC in the Implementation Advice Letter.

12. It is reasonable to require PG&E and SCE to clarify in the Implementation Advice Letter that they will provide a customer with a Standard Offer Form Agreement upon their determination that there exists a LLP whose operation will result in a benefit to both the customer and to ratepayers.

13. It is reasonable to require PG&E and SCE to provide, with specificity, information supporting any restriction on underground components from the Standard Offer.



14. It is reasonable to require IOUs to identify a minimum of three seasons for which they experience distinct operational conditions within their service territory, and to provide at least two daily capacity values for each season.

15. If an IOU already offers customers an LLP three or more seasons with two or more daily values per season, then they already comply with the minimum granularity requirement.

16. It is reasonable to both require a minimum level of granularity for Standard Offer LLPs and provide IOU engineers the discretion to exceed this minimum when circumstances justify a more detailed LLP.

17. It is reasonable to require PG&E and SCE to give customers the option to request a LLP with 24 annual values, provided that the technical capability exists, the IOU engineers believe it can be safely offered, and the customer bears the cost of exercising this option.

18. It is reasonable to require PG&E and SCE to maintain records of their analysis of capacity constrained infrastructure for at least 3 years.

19. It is reasonable to allow the IOUs flexibility to equally consider more than one application if those applications were received within a relatively concurrent window of time.

20. It is reasonable to leave the question of how to share capacity between customers to the IOUs' discretion in the Implementation Advice Letter, with the caveats that the IOUs must be transparent about their method for allocation of capacity, must not favor any customer class, and must not reduce the capacity of an existing Standard Offer to accommodate later applications.

21. It is reasonable to require PG&E and SCE to verify customer interest in and ability to utilize a Standard Offer before performing a full engineering study.

22. It is reasonable to direct PG&E and SCE to extend the FSCA option to all customers where there is both a customer and ratepayer benefit, even if there is a period during the year when the customer cannot be provided their full requested demand.

23. It is reasonable to direct PG&E and SCE, in the Standard Offer pathway for Step 2, to (a) perform an engineering evaluation that compares customer load profile and load ramp to distribution capacity prior to performing a full power flow study, and (b) to contact the customer when this engineering evaluation identifies insufficient capacity and the customer application indicates interest in a FSC.

24. It is reasonable to require PG&E and SCE to ask whether a Standard Offer customer would prefer optimization of their LLP for power or for energy.

25. It is reasonable for the Standard Offer process consider on site generation as a part of its engineering evaluation whether it be existing or planned, non-exporting or exporting.

26. It is reasonable to direct PG&E and SCE to incorporate the output of photovoltaics for customers without onsite storage into their engineering evaluation, describe the process used for this incorporation, and to continue working toward offering a single, streamlined process to customers requesting both load and generation.

27. It is reasonable to require PG&E and SCE to collect and retain data for all curtailment incidents affecting Standard Offer customers for at least three years.

28. It is reasonable to direct PG&E and SCE to allow for an annual review of capacity in the structure of the Standard Offer, upon customer request and payment by the customer of any additional expense incurred in performing such a review.

29. It is reasonable to direct PG&E and SCE to allow for an ad-hoc review of capacity in the structure of the Standard Offer, upon customer request and payment by the customer of any additional expense incurred in performing such a review.

30. It is reasonable to require SCE and PG&E to provide a fulsome description of the load determination process in the Implementation Advice Letter and to update their electric Tariff Rules to include definitions for the necessary terminology to accurately describe this process.

31. It is reasonable to direct PG&E and SCE to assess the capacity available to a site for a Standard Offer based on the normal capacity of the most constrained electrical component without adding a buffer value.

32. It is reasonable for PG&E and SCE to assess the effect that loss of control would have for those Standard Offer customers who are using manual or uncertified controls and have not installed protective devices.

33. It is reasonable to direct PG&E and SCE to design their Standard Offer LLPs such that IOU equipment will stay within their emergency capacity rating if a customer using manual or uncertified controls fails to control site load.

34. It is reasonable to allow Standard Offer customers to choose the method of load control that best meets their needs.

35. It is reasonable to direct PG&E and SCE to incorporate provisions in the Standard Offer Form Agreement that clearly assign liability for damages to IOU equipment resulting from the exceedance of the approved LLP to the Standard Offer customer.

36. It is reasonable to direct PG&E and SCE to utilize AMI infrastructure as the default method used to monitor compliance with Standard Offer LLPs.

37. It is reasonable to allow each IOU latitude to create divergent processes to move from AMI data to customer notification of Standard Offer LLP exceedance.

38. It is reasonable for PG&E and SCE to utilize customer education as the first remediation step if a customer should exceed their Standard Offer LLP in a way that does not create a safety, reliability, or shortage of supply concern.

39. It is reasonable to provide a safe harbor for load controlled by the power input limiting function of the UL 3141 standard, relying on the UL 3141 PCS certification requirements.

40. It is reasonable to require PG&E and SCE to provide the customer their LLP values electronically, in the format specified by UL 3141 Edition two Annex A.

41. It is reasonable to allow Standard Offer customers to use uncertified power control solutions when equipment with a UL 3141 PCS is unavailable or infeasible for the customer's needs.

42. It is reasonable to require that Standard Offer customer load installed under the control of a certified UL 3141 PCS shall not comprise an increase in connected or metered load provided that the UL 3141 PCS setpoint does not exceed the total amount of other connected or metered loads.

43. It is reasonable to allow Standard Offer customers and utilities to use mutually agreeable solutions to access safe harbor when equipment with a UL 3141 PCS is unavailable or infeasible for the customer's needs.

44. It is reasonable to allow PG&E and SCE to require that uncertified systems used by Standard Offer customers must successfully undergo system commissioning in order for their controlled load to be provided safe harbor treatment.

45. It is reasonable for IOUs providing a Standard Offer to apply the standard parameters for response time to UL 3141 or mutually agreeable PCS used to control site load.

46. It is reasonable to not require telemetry as a part of the Standard Offer.

47. It is reasonable to require PG&E and SCE to formalize their existing preliminary capacity assessment reports and align the process elements of their offerings to the extent practicable.

48. It is reasonable to set the target timeline between the customer application being deemed complete and the initial customer load limit conversation to an average of 30 days.

49. It is reasonable to establish targets for the completion of IOU dependent steps within the Standard Offer and to track performance relative to these targets.

50. It is reasonable to set the target timeline between the final determination of load limits to the electronic delivery of the LLP schedule file and Standard Offer Form Agreement to 15 days.

51. It is reasonable to direct PG&E and SCE to track the initial costs of establishing and the ongoing costs of administering the Standard Offer, as well as the additional energy consumption enabled for each customer at an hourly level.

52. It is reasonable to require PG&E and SCE to track data at a sufficient level of granularity to determine which individual projects are cost-efficient and to include the specific data fields and levels of granularity for data tracking in the Implementation Advice Letter.

53. It is reasonable to require PG&E and SCE to consult with the Commission's Energy Division and include data useful to refining the Standard Offer in the biannual reports required of them by D.24-09-020.

54. It is reasonable for SCE to assess LCMS parameters and report on learnings from their implementation in the LCMS pilot.

55. It is reasonable for PG&E and SCE to formalize their informal preliminary capacity assessment reports within a tariffed offering.

56. It is reasonable to establish a target timeline of 30 days from when PG&E and SCE receive a request until they provide the customer with the full preliminary capacity assessment results.

57. It is reasonable to clarify that, under D.24-09-020, the Large IOUs have the discretion to pause the target timelines when the circumstances do not warrant continued downstream project work.

**O R D E R****IT IS ORDERED** that:

1. Pacific Gas and Electric Company and Southern California Edison Company shall file a joint Tier 2 Advice Letter establishing a tariffed Standard Offering Flexible Service Connection Form Agreement according to the direction provided in this decision within 60 days of the issuance of this decision.
2. Pacific Gas and Electric Company and Southern California Edison Company shall file a Tier 1 Advice Letter modifying their Tariff Rule 2 and 3 language as specified in the appendices to this decision within 15 days of the issuance of this decision.
3. Pacific Gas and Electric Company and Southern California Edison shall file a Tier 2 Advice Letter to modify the Standard Form Agreement as necessary.
4. Pacific Gas and Electric Company and Southern California Edison Company shall file, in this proceeding and any successor proceeding by January 15, 2029, a report summarizing the costs, additional energy consumption enabled, assessment of the Standard Offer Static Flexible Service Connection's (Standard Offer's) cost-efficiency, and a quantitative assessment of the effect the Standard Offer has had upon its revenue requirement.
5. Pacific Gas and Electric Company and Southern California Edison Company shall report on Standard Offer Flexible Service Connections (Standard Offer) data, as listed in Appendix C to this decision, and Preliminary Capacity Assessment data as discussed in Section 10 of this decision, to inform future Standard Offer requirements in the biannual reports directed in Decision 24-09-020, starting with the March 31, 2026 report. These utilities shall

consult with the Commission's Energy Division to finalize the list of Standard Offer data appropriate for inclusion in biannual reporting.

6. Southern California Edison Company shall prepare and file a report assessing learnings from the Load Control Management Study pilot within this proceeding and in Rulemaking 21-06-017, by March 1, 2026 and update it as specified in Section 9.

7. Pacific Gas and Electric Company and Southern California Edison Company shall file, no later than 75 days from the issuance of this decision, a Tier 2 advice letter formalizing their preliminary capacity assessment offerings as directed in Section Ten of this decision.

8. Rulemaking 24-01-018 remains open.

This order is effective today.

Dated \_\_\_\_\_, at Sacramento, California



APPENDIX A:  
Next Steps Effort Definitions

### Next Steps Effort Definitions

- **Bridging Solution** is defined as a temporary measure that allows a customer full or partial energization of new load earlier than otherwise possible when that customer is constrained by capacity limitations.
- **Flexible Service Connection (FSC)** is defined as a means of energizing new load to a utility's distribution system under specified import limits and operational conditions that vary over time.
- **Flexible Energization Tariff (FET)** is the set of rules and requirements for expeditiously energizing new load to a utility's distribution system under a Flexible Service Connection. It includes some or all of the rules governing the energization process including Rule 2, Rule 15, and Rule 16, as well as the Electric Vehicle Rule 29 and Rule 45.
- **Flexible Service Connection Agreement (FSCA)** means a contract between a Distribution System Operator and a customer connecting load to the distribution system; this agreement articulates limits on the amount of electricity imported from the distribution system at specific times.
- **Limited Load Profile (LLP)** means a profile, or schedule, to be attached to service agreements governing energization of loads. It contains information on the maximum power that can be imported from the grid by the customer at any given time.
  - **Firm Capacity** is capacity that remains available as long as the FSCA remains in place.

- **Non-Firm Capacity** is capacity that can change in response to real-time or forecasted grid conditions as specified by provisions articulated in the FSCA.
- **A Static LLP** is an LLP that provides firm capacity. It is established and agreed upon at the time the FSCA is established and remains in place from year to year.
- **Flexible Service** means the ability to import power at varying levels through time.
- **Power Control System (PCS)** is a system that monitors the output of power sources and/or power consumption of loads and regulates or limits current or power within predefined limits.
- **Uniform Load Integration Capacity Analysis (Load ICA)** is a tool used to calculate grid modeling results that represent the maximum uniform power available to serve load at the point of interconnection without violating the thermal, voltage variation, and steady state voltage criteria. These results from this tool take the form of a set of power values that represent capacity available during different periods of time.

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APPENDIX B:  
Minimum Topics to be Addressed on  
IOU Application Web Pages

**Minimum Topics to be Addressed on  
IOU Application Web Pages**

- Information on the option and availability of the Preliminary Capacity Assessment
- Description and definition of FSC
- Description and definition of LLP
  - How does a utility design an LLP?
  - What information can the customer provide in their application to indicate they may be a good candidate and may have flexibility during certain hours of the day?
- Benefits to the customer
- Impact on energization timeline
- Potential challenges to the customer (e.g., delay in full capacity, equipment, other associated costs)
  - Estimation and description of customer side costs
- Description of customers that make good candidates for FSC
  - Including technical requirements for participation
- A notice that not all customers will be eligible for FSC, and that final determination for eligibility is made by the utility.
- Description of how the utility will enroll customers in FSC
- Opportunity for LLP modifications
- Description of any other process details (including when/how a utility would terminate agreement, when/how a customer can terminate an agreement)
- Description of technologies (e.g., PCS) relevant to operating under a LLP and the types of customers that may benefit from the technology

APPENDIX C:  
Minimum Data Fields to be Tracked for  
Standard Offer Refinement

**Minimum Data Fields to be Tracked for Standard Offer Refinement**

- FSC status (offered, agreement signed, ongoing, concluded, cancelled)
- Whether or not customer requested a Preliminary Capacity Assessment
- FSC agreement signed date
- FSC implemented date
- Customer Load Connected (kW)
- What grid component led to the capacity constraint
- What amount of headroom was on the constrained grid component prior to the FSC
- FSC Agreement Signed Date
- FSC Customer Connected Date (if not already energized)
- Description of LLP by season or by specified dates
- PCS Installed (Y/N)

APPENDIX D:  
PG&E Tariff Rule 2 New Section H.7



**PG&E Tariff Rule 2 Addition – Section H.7**

Where a customer has a portion of their electric utilization equipment installed within a power control system (PCS) that is certified to the UL 3141 standard and whose power import limit (PIL) functionality has been verified through a Nationally Recognized Testing Laboratory (NRTL) evaluation, the PIL references the point of common coupling, and the PCS limits power import into the facility such that it will not exceed the connected load of the remaining electric utilization equipment, that is known as controlled load. Controlled load shall not be included in the computation of connected load or metered demand.

APPENDIX E:  
PG&E Tariff Rule 3 Section C Language Addition

**Tariff Rule 3 Addition**

Rule 3 Language (PG&E Section C):

**C. CHANGE OF CUSTOMER'S APPARATUS OR EQUIPMENT**

In the event that the customer shall make any material change either in the amount or character of the electric lamps, appliances or apparatus installed upon the premises to be supplied with electric energy, the customer shall immediately give PG&E written notice of this fact. Addition of Controlled Load, as defined in Rule 2 Section H.7, does not constitute a material change for a customer utilizing dedicated secondary infrastructure.