

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

**Agenda ID# 24191
RESOLUTION G-3621
June 11, 2026**

R E S O L U T I O N

Resolution G-3621. Reaffirms the Annual Fee for registered Core Transport Agents pursuant to Public Utilities Code Section 984(b) and Decision 18-02-002.

PROPOSED OUTCOME

- Reiterates the current cost allocation methodology for the Core Transport Agent (CTA) Annual Fee as outlined in Resolution G-3597.

SAFETY CONSIDERATIONS:

- There are no safety considerations associated with this resolution.

ESTIMATED COST:

- Each registered CTA will pay an Annual Fee that consists of a Base Fee of \$5,000 and a Variable Fee. Only those CTAs that received complaints or were the subject of UEB unauthorized enrollment investigations and enforcement actions in 2025 will pay the Variable Fee. Pursuant to Public Utilities Code Section 984(b), if payment is not received within 30 days of billing, a 15 percent penalty will be assessed on the full amount billed.

By Energy Division staff's own motion pursuant to Decision 18-02-002.

SUMMARY

This resolution reaffirms the Core Transport Agent (CTA) Annual Fee for 2026. The Annual Fee is composed of a Base Fee and a Variable Fee. The Base Fee of \$5,000 per CTA reflects the CPUC's fixed administrative costs related to CTAs for the year beginning July 1, 2024, through June 30, 2025. The two-part Variable Fee is based on the number and type of complaints received by the California Public Utilities Commission's (CPUC) Consumer Affairs Branch

(CAB) and the number of complaints alleging unauthorized enrollment reviewed by the Utility Enforcement Branch (UEB) and the cost of UEB actions in calendar year 2025.

BACKGROUND

CTAs are non-utility gas suppliers who purchase gas on behalf of residential and small commercial end-use customers. California customers can elect to use a CTA as their gas supplier. CTA customers buy natural gas from the CTA but pay their local utility for gas transportation and delivery service on its distribution pipelines.

The CPUC does not regulate the rates CTAs charge their customers, but CTAs are required to register with the CPUC in order to conduct business in California. The CPUC can suspend or revoke the registration of a noncompliant CTA. Senate Bill (SB) 656 (Wright, 2013) also tasked the CPUC with processing customer complaints against CTAs.

SB 656

SB 656 (Wright, 2013) introduced Public Utilities Code (PUC) §§ 980-989.5, establishing a framework for consumer protection rules for CTAs. PUC § 984(b) states: “The commission shall annually determine the costs of administering the registration program and other facets of consumer protection directly related to the core transport service transactions of core transport agents, including the cost for the duties imposed pursuant to subdivision (c) of Section 984.5.”

D.18-02-002

On March 13, 2014, the CPUC opened Rulemaking (R.) 14-03-002 to implement SB 656. In Decision (D.) 18-02-002, the CPUC determined that all “registered core transport agents are subject to the assessment of an annual fee as described in Public Utilities Code Section 984(b) and in today’s decision.”¹ The CPUC also directed Energy Division staff to determine, on an annual basis, “the costs of administering the registration program and other facets of consumer protection related to core transport service and core transport agents, and to prepare the resolutions for the recurring charge as addressed in Section 2.6.3. of today’s decision.”² In Section 2.6.3, the Decision states, “Subsequent annual reviews of these costs shall also take place by the staff, and if these costs warrant an increase in the annual fee collected from the

¹ D.18-02-002 at Ordering Paragraph 1(e).

² Ibid, Ordering Paragraph 5(a)(v). This decision does not require a resolution annually.

CTAs, staff shall prepare a proposed resolution with the recommended annual fee.”³ The *2026 Core Transport Agent Program Annual Report (CTA Annual Report)* is attached as Appendix A.

While D.18-02-002 did not immediately change the CTA fee, it did find that PUC § 984(b) allows for an annual fee to cover the costs of administering the registration as well “as other facets of consumer protection directly related to core transport service.”⁴ Further, D.18-02-002 found that such a fee is consistent with the recurring annual fee applied to non-utility, third-party electricity procuring entities known as Electric Service Providers (ESPs), which was adopted in D.98-03-072 and implemented through Resolution M-4797. It also stated that “future CTAs who have not registered with the Commission are advised that this CTA registration fee may be adjusted in the future.”⁵

Resolution M-4797

Adopted on November 4, 1999, Resolution M-4797 imposes an annual fee of \$1,000 on all registered ESPs. Initially, the annual fee was calculated by dividing the estimated administrative costs (roughly \$1 million) by the number of active, inactive, and suspended ESPs (256), resulting in a nearly \$4,000 annual fee.

However, the resolution states:

...this [residential and small commercial Direct Access (DA)] market is still new, and market penetration is limited, it would be prudent to establish an annual fee of \$1,000, which is below the full cost of recovery and should not discourage new entrants in the market.⁶

Resolution UEB 003

On October 25, 2018, the CPUC enacted Resolution UEB-003⁷ adopting a CTA Citation Program and delegating the authority to the Consumer Protection and Enforcement Division (CPED), within which UEB is a branch, to issue citations of \$1,000 per incident to CTAs that fail to comply with the standards for verification of change in provider requirements in D.18-02-002.

³ Ibid, p. 79,

⁴ Ibid, pp.78-79

⁵ Ibid, p. 77.

⁶ Resolution M-4797, p. 3

⁷ Resolution UEB 003: [236850987.PDF \(ca.gov\)](https://www.cpuc.ca.gov/Pages/236850987.PDF)

Resolution G-3552

On April 25, 2019, the CPUC approved Resolution G-3552, which established an annual fee of \$2,860 for CTAs.⁸ That fee was based on the cost of one Energy Division staff person who was charged with administering the CTA program. Resolution G-3552 noted that CTA-related costs varied with the number of complaints and that the CPUC would consider a complaint-based Variable Fee in the future. However, at the time the resolution was issued, the CPUC's CTA-related complaint process was newly established, and it was determined that there was not enough information to institute a complaint-based Variable Fee at that time.⁹

Resolution G-3580

Adopted on June 3, 2021, Resolution G-3580 increased the Base Fee to \$3,955 for each registered CTA effective July 1, 2022. It added a Variable Fee based on the number and type of complaints received by CAB and UEB in the preceding calendar year, January 1 to December 31.

Resolution G-3589

On June 23, 2022, the CPUC adopted Resolution G-3589, which decreased the Base Fee to \$3,864. The resolution further stated that Energy Division could continue to apply the Base Fee at the same level and the Variable Fee using the same methodology in future years without submitting a new resolution.

Resolution G-3597

On May 18, 2023, the CPUC adopted Resolution G-3597, which increased the Base Fee to \$5,000 and updated how the variable portion of the fee is calculated, introducing a more detailed methodology for allocating variable fees, including a temporary cap to ease the transition.

CTA Annual Reports

Per Resolutions G-3589 and G-3597, a new resolution is not needed if the CPUC makes no changes to the Base Fee or the methodologies for calculating the Variable Fee. Thus, in 2024 and 2025, CPUC staff issued *CTA Annual Reports*, but the CPUC did not issue additional resolutions.¹⁰

⁸ Resolution G-3552: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M285/K723/285723653.PDF>

⁹ Resolution G-3552, pp 5-7

¹⁰ See [Core Transport Agent Annual Reports and Resolutions](#).

NOTICE

This resolution is issued pursuant to D.18-02-022, Ordering Paragraph 5(a)(v). The notice for the resolution was given by serving the draft to all CTAs and the Service list for R.14-03-002.

DISCUSSION

D.18-02-002 requires an annual review of the costs of administering the CTA registration program, stating:

The staff responsible for the annual review need to be cognizant of the costs of activities, especially §§ 984.5 and 987, that could drive these annual costs even higher. At the same time, staff and the Commission need to weigh whether the proposed increase in the annual fee will deter market entry by prospective CTAs.¹¹

In Resolution M-4797, the CPUC considered how to balance the costs of administering the ESP registration program with the impact an annual fee could have in deterring potential market participants. At the time, the ESP program was new, which increased the concern that a high fee could deter new entrants. That concern is not relevant here. CTAs are no longer new to the California market, and today, the CTA market is mature.

The core transportation market has been evolving since 1995, when D.95-07-048 approved “unbundling” utility transportation and natural gas procurement costs. There are currently 39 registered CTAs, of which 36 are active market participants. CTAs operate in each of the regulated California gas utility markets, and there is no evidence of any significant barriers to market entry. Since the core aggregation market has been functioning for nearly 30 years in California, the caution applied in Resolution M-4797 need not apply in determining the annual fee for CTAs.

The methodology to assess the costs of administering the program and resolving customer complaints was set out in Resolution G-3580 and updated in Resolutions G-3589 and G-3597. The methodology set in Resolution G-3597 is reaffirmed in this resolution.¹² The 2026 Annual Fee includes a Base Fee, which covers the costs of CTA administration, and a two-part Variable

¹⁰ D.18-02-002, p. 79

¹² See [Core Transport Agent Annual Reports and Resolutions](#).

Fee, which covers CAB’s cost of managing complaints as well as UEB investigations and enforcement actions. Together, the Base and Variable Fees reasonably reflect the cost of administering the program and allocate variable costs to the individual CTAs associated with those administrative costs.

Base Fee

The Base Fee includes the cost to Energy Division of administering the program and the cost to CAB of reviewing the Monthly CTA Complaint Report. For Energy Division, these costs include one permanent full-time Public Utilities Regulatory Analyst (PURA) I, one part-time PURA II, and 15 percent of the time of one Program and Project Supervisor (PPS). For CAB, the cost includes one PURA III, who allocates approximately 10 hours annually or 0.6 percent of their time to review the Monthly CTA Complaint Reports.¹³ Together these costs totaled \$212,491 in 2025, a 34 percent increase over 2024. The driver for this increase is a change in staff time allocated to the CTA program.

The costs of administering the CTA program are relatively fixed and do not vary materially with the number of CTA-related complaints received. Thus, previous resolutions divided administrative costs equally among the active CTAs. We use the same allocation methodology below, which results in an annual base cost of \$5,449 per CTA (See Table 1 below).

Table 1: Base Fee for 2026

CPUC Organizational Area	Position	Salary + Benefits	% Time on CTAs	CTA Cost
Energy Division	PURA I	\$120,245	100%	\$120,245
Energy Division	PURA II	\$142,305	37.5%	\$53,364
Energy Division	PPS	\$252,849	15%	\$37,927
Consumer Affairs Branch	PURA III	\$159,106	0.6%	\$955
Total Base Cost				\$212,491
Base Cost Per CTA	39			\$5,449

In 2023, Resolution G-3597 set a Base Fee of \$5,000 that will remain in place unless the *CTA Annual Report* finds the actual Base Costs of administering the program to be 20 percent higher

¹³ For greater consistency, the median salary for each job category is used, not the actual salary.

or lower than \$5,000 per CTA. Establishing a set Base Fee with a tolerance band makes CTA fees more stable year-to-year while still providing the CPUC with the flexibility to respond to inflation or changes in personnel costs.

This resolution reaffirms the methodology established in G-3597. The Base Costs per CTA are 9 percent higher than \$5,000 and thus within the 20 percent tolerance band. Therefore, the Base Fee for 2026 remains \$5,000. If future Base Costs are outside the 20 percent tolerance band, the CPUC will issue a new resolution updating the Base Fee.

Variable Fee

The Variable Fee covers the cost of responding to and investigating consumer complaints and pursuing enforcement actions. One portion of the Variable Fee is driven by complaints received by CAB; the other is due to review of complaints alleging unauthorized enrollment and enforcement actions undertaken by UEB.

Variable Fee: CAB

During 2025, CAB received a total of 2,942 CTA-related complaints, 1,257 more than in 2024. Of these, 2,067 were received by phone and 875 were informal written complaints. The cost of responding to a complaint varies based on the average time involved. Phone contacts are incoming calls from consumers seeking assistance with a CTA-related issue. If the consumer is unable to resolve a problem with a CTA after receiving phone assistance, CAB encourages them to submit an informal written complaint. A phone contact involves significantly less time to resolve than informal written complaints (see Table 2 below).

Table 2: 2025 Variable Costs by Complaint Type: CAB¹⁴

	Complaints by Type	Average Hours per Complaint	Median Cost per Hour	Cost Per Complaint	Total Cost
Phone Contacts	2,067	0.11	\$53.99 ¹⁵	\$5.94	\$12,277
Informal Written Complaints	875	3.51	\$53.99	\$189.52	\$165,830
Total	2,942				\$178,107

The methodology for determining the CAB portion of the Variable Fee to be applied to an individual CTA is calculated as follows:

CAB Variable Cost:

- Cost per phone contact multiplied by the CTA’s number of phone contacts; plus,
- Cost per informal written complaint multiplied by the CTA’s number of informal written complaints.

For the 2026 fee, the cost per Phone Contact is \$5.94 and the cost per Informal Written Complaint is \$189.52

Variable Fee: UEB

The second factor in the Variable Fee is the cost of the investigations and enforcement actions programs conducted by the Utility Enforcement Branch. UEB staff are responsible for investigating unauthorized enrollment complaints and identifying trends in complaints pursuant to Resolution UEB-003;¹⁶ issuing citations, warnings, and other enforcement actions; and collecting fines. To calculate total UEB cost, staff use the median salary and benefits for each position multiplied by the percentage of time each person spent on CTA-related investigations in the preceding year. In 2025, staff time increased due to an increase in the

¹⁴ Small discrepancies in calculations are due to rounding error.

¹⁵ Energy Division staff receive CAB’s median cost per hour from the Administrative Services Division

¹⁶ UEB-003: [236850987.PDF \(ca.gov\)](https://www.ca.gov/files/236850987.PDF)

number of CTA-related citations. UEB’s CTA-related costs for 2025 totaled \$604,639¹⁷ an increase of \$18,271 compared to 2024 (see Table 3 below).

Table 3: Variable Costs: UEB

Position	Median Annual Salary + Benefits	% Time on CTAs	CTA Cost
PM	\$291,390	20%	\$58,278
PPS	\$252,849	30%	\$75,855
PURA V	\$191,956	15%	\$28,793
PURA IV	\$174,733	40%	\$69,893
PURA III	\$159,106	50%	\$79,553
PURA III	\$159,106	60%	\$95,463
PURA II	\$142,305	20%	\$28,461
PURA I	\$120,245	70%	\$84,171
PURA I	\$120,245	70%	\$84,171
Total			\$604,639

Resolution G-3597 allocated UEB costs as follows:

First, UEB costs are allocated only to those CTAs who are the subject of alleged unauthorized enrollment complaints since that is UEB’s focus. Second, UEB costs are divided between time spent investigating allegations of unauthorized enrollment and time spent pursuing enforcement actions. The allocation methodology is as follows:

- Disaggregate total UEB costs between alleged unauthorized enrollment investigations and enforcement actions by dividing the number of UEB actions by the number of complaints.
 - Multiply the resulting percentage by total UEB costs to determine the amount to allocate towards enforcement.

¹⁷ There are additional CAB variable costs that can only be estimated. These are considered to be less than \$1,000 and are not included in this analysis. Additionally, there are costs associated with the citations generated by the Utility Enforcement Branch that cannot be estimated or reliably estimated at this time.

- Allocate the remainder toward alleged unauthorized enrollment investigation.
- Divide alleged unauthorized enrollment investigation costs equally per unauthorized enrollment complaint.
- Divide enforcement actions costs equally per UEB action.

This resolution reaffirms the methodology established in G-3597.

In 2025, UEB staff reviewed 2,942 CTA-related complaints, 818 of which concerned alleged unauthorized enrollment and could be attributed to a particular CTA. In addition, UEB staff issued 55 CTA-related citations totaling \$55,000,^{18,19} five warning notices, two requests for action, one notice of citation, one cease-and-desist letter, and one administrative consent order, totaling 65 enforcement actions.²⁰

- 65 enforcement actions / 818 unauthorized enrollment complaints results in 8 percent of costs allocated to enforcement and 92 percent allocated to investigations.²¹
 - Total enforcement: $8\% * \$604,639 = \$48,046$
 - Total alleged unauthorized enrollment investigations: $92\% * \$604,639 = \$556,593$
- Alleged unauthorized enrollment investigations: $\$556,593 / 818 \text{ complaints} = \$680.43 \text{ per complaint}$
- Enforcement: $\$48,046 / 65 \text{ UEB actions} = \$739.17 \text{ per action}$

For 2026, the cost for alleged unauthorized enrollment investigation is \$680.43 per unauthorized enrollment complaint, and the cost for enforcement is \$739.17 per UEB action.

Annual Fee for CTAs

The 2026 Annual Fee shall be the sum of the Base Fee and the Variable Fee. The 2026 annual Base Fee for the CTA program shall be \$5,000. The Variable Fee covers CAB and UEB costs to respond to complaints and take consumer protection actions. The CAB portion of the Variable Fee is \$5.94 per phone complaint and \$189.52 per informal written complaint. The Variable Fee for UEB-related costs is \$680.43 per unauthorized enrollment complaint and \$739.17 per enforcement action. The Variable Fees owed by each CTA are detailed in Appendix A-1 below,

¹⁸ The Fiscal Office collects citation payments and deposits them into the State's General Fund.

¹⁹ A list of CTAs citations can be found on the CPUC website: [UEB Citations-Fines-Restitutions -- Active.xlsx \(ca.gov\)](#)

²⁰ For comparison, UEB investigated 1,685 complaints in 2024, 435 of which concerned unauthorized enrollment; issued 387 CTA-related citations for a total of \$387,000; and sent six cease-and-desist and request-for-action letters.

²¹ Percentages and total costs are rounded to the nearest whole number.

which includes the total Annual Fee owed by each CTA. CTAs who receive no complaints do not pay a Variable Fee.

The Annual Fee shall be assessed by July 1, 2026. Pursuant to Public Utilities Code 984(b), if payment is not received by the CPUC within 30 days of billing, a 15-percent late payment penalty will be assessed on the CTA.

In subsequent years, Energy Division staff will continue to issue the *CTA Annual Report* to review the administrative and customer protection costs of the CTA program. The Base Fee shall continue to be \$5,000 unless the actual administration costs are outside the 20 percent tolerance band. If administrative costs are higher or lower than the tolerance band, a new resolution will be issued. The Variable Fee shall continue to be calculated using the methodologies described in the Variable Fee section of this resolution. The CPUC will issue a new resolution if it wishes to propose a change to the methodology.

CPUC staff shall monitor potential CTA cancellations or a decline in registrations for signs that the fee is deterring market entry. Staff may propose a revised fee by resolution on staff's own motion should a change to this annual fee be necessary in the future.

COMMENTS

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

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

FINDINGS

1. Public Utilities Code Section 984(b) authorizes collection of annual fees from Core Transport Agents.

2. Ordering Paragraph 5(a)(v) of Decision 18-02-002 directs Energy Division to “determine the costs of administering the registration program and other facets of consumer protection related to core transport service and core transport agents, and to prepare the resolutions for the recurring charge as addressed in Section 2.6.3. of today’s decision.”
3. Section 2.6.3. of D.18-02-002 states that Energy Division staff shall review Core Transport Agent program costs annually and prepare a resolution if an increase to the Annual Fee is warranted.
4. Energy Division is to act as lead on most of the tasks to implement the consumer protection rules regarding Core Transport Agents.
5. A Base Annual fee of \$5,000 plus a Variable Fee determined by the number and type of complaints made to the Consumer Affairs Branch and the complaints investigated and the actions taken by the Utility Enforcement Branch against each Core Transport Agent covers the CPUC’s costs to administer the Core Transport Agent program.
6. It is reasonable for Energy Division staff to assess the Base Fee at \$5,000 per Core Transport Agent for 2026 and subsequent years unless the Core Transport Agent Program Annual Report finds that actual administrative costs are 20 percent higher or lower than \$5,000 per CTA.
7. It is reasonable for Energy Division staff to assess the Variable Fee for each Core Transport Agent in 2026, and subsequent years based on the two-part methodology described in this resolution to allocate Consumer Affairs Branch and Utility Enforcement Branch costs.

THEREFORE, IT IS ORDERED THAT:

1. Pursuant to Ordering Paragraph 1(e) of Decision 18-02-002, each Core Transport Agent shall pay the 2026 Annual Fee, which includes a Base Fee of \$5,000 and a Variable Fee based on the number and type of complaints attributed to the Core Transport Agent and the complaints investigated and actions taken by the Utility Enforcement Branch against it from January 2025 through December 2025 and determined in accordance with the methodology described in this resolution.
2. Energy Division staff will continue to issue the Core Transport Agent Program Annual Report to review the administrative cost of the CTA program. If these costs are more

than 20 percent above or below the current Base Fee of \$5,000 per CTA, staff shall draft a resolution that changes the Base Fee.

3. Energy Division staff may propose a change to the methodology for calculating the Variable Fee by resolution on staff's own motion should a change be necessary in the future.
4. All registered CTAs shall be assessed the Annual Fee by July 1, 2026, and by July 1 of the subsequent years.
5. Pursuant to Public Utilities Code 984(b), if payment is not received within 30 days of billing, a 15-percent late payment penalty will be assessed on the CTA.
6. Failure to pay the Annual Fee with 15-percent penalty will subject the CTA to suspension or revocation of its registration.

This resolution is effective today.

The foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on June 11, 2026; the following Commissioners voting favorably thereon:

Commissioner Signature blocks to be added
upon adoption of the resolution

Dated June 11, 2026, at Sacramento, California.

APPENDIX A

2026 Core Transport Agent Program Annual Report

Background and Summary

Since 1991, the California Public Utilities Commission (CPUC) has allowed all core customers²² of the state’s regulated natural gas utilities the option to choose a non-utility gas supplier to procure their supply of natural gas.²³ The program is intended to create competition between regulated and unregulated gas suppliers and to give consumers a choice of providers. The unregulated gas suppliers, known as Core Transport Agents²⁴ or CTAs, procure gas for the residential and small commercial customers known as “core” customers. The gas supplied by CTAs is delivered over the regulated utilities’ pipeline systems.

The CPUC does not regulate the rates or fees for gas services supplied by CTAs. Customers who are considering leaving the regulated gas utility for CTA gas services are encouraged to carefully review the CTA’s prices, terms, and conditions and compare them with those of the gas utility’s prior to signing any agreement with the CTA.

In 2013, Senate Bill 656 required the CPUC to regulate certain aspects of CTA services having to do with consumer protection and the resolution of consumer complaints. In 2018, Decision (D.)

18-02-002 established an annual CTA fee (Annual Fee) that was to be based on the cost of administering the CTA program. The decision also required the CPUC’s Energy Division staff to submit a *Core Transport Agent Program Annual Report (CTA Annual Report)* on these costs and to recommend changes to the Annual Fee via resolution as necessary.

²² Core customers are made up of small residential and commercial customers. CTAs do not serve the large commercial and industrial customers known as noncore customers.

²³ D.91-02-040

²⁴ Also referred to as core aggregation service.

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Energy Division staff have issued a series of resolutions since the 2018 decision that were subsequently approved by the Commission. In 2019, Resolution G-3522 established an Annual Fee of \$2,860 and noted that the Commission might consider a Variable Fee in future years.²⁵ In 2021, G-3580 increased the Base Fee to \$3,955 and established a Variable Fee based on the number and type of customer complaints received about each CTA.²⁶ In 2022, Resolution G-3589, slightly reduced the Base Fee and adjusted the methodology for determining the Variable Fee.²⁷

In 2023, G-3597 increased the Base Fee to \$5,000 and made it constant for future years unless administrative costs are more than 20 percent higher or lower than \$5,000. The resolution also changed the methodology for calculating the Variable Fee to more precisely allocate enforcement costs.²⁸

CTA Registration

There are currently 39 CTAs registered with the CPUC.²⁹ Energy Division staff are responsible for the registration process. Staff review the CTA's filings for evidence of its operational and technical abilities and financial health. Key CTA personnel are required to pass a background check with the California Department of Justice before a CTA is eligible to complete registration.

CTA Program Administration and Consumer Protections

Several groups within the CPUC administer the CTA program and work to ensure consumer protection. These groups include Energy Division, the Consumer Affairs Branch (CAB), the Utility Enforcement Branch (UEB), and the Fiscal Office. Energy Division is charged with administering the CTA program, registering CTAs, creating and updating the

²⁵ Resolution G-3552: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M285/K723/285723653.PDF>.

²⁶ Resolution G-3580: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M387/K064/387064412.PDF>.

²⁷

Resolution G-3589: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M490/K129/490129633.PDF>.

²⁸ Resolution G-3597: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M509/K545/509545115.PDF>.

²⁹ List of registered CTAs from the CPUC website: apps.cpuc.ca.gov/apex/f?p=555:1:::

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CTA website, monitoring complaints, responding to consumers' and CTA inquiries, providing guidance to CTAs on how to enter and withdraw from the California market, collecting rate information from CTAs to display on the CPUC's website, and conducting analysis on CTA-related issues for decisionmakers.

CAB receives consumers' CTA-related complaints both by phone and in writing. CAB engages with the CTAs to resolve consumers' concerns, which generally center on billing, service issues, and deceptive marketing.

Energy Division creates the Monthly CTA Complaint Report with direction from CAB that documents consumer complaints by type and submits it to the Utility Enforcement Branch for additional review.

UEB's work has two parts. First, UEB staff analyze both the Monthly CTA Complaint Report and the complaints it receives from local District Attorney's offices, looking for overall patterns and trends, with a focus on complaints related to unauthorized enrollment. Second, UEB staff pursue citations against individual CTAs who fail to comply with the standard for verifying enrollment or to abide by the California Public Utilities Code or CPUC decisions when the initial screen indicates that such action is warranted.

Fiscal Office staff record, track, and receive the financial resources that the CTAs post to the CPUC. Fiscal Office staff also inform Energy Division staff when registered CTAs submit the Annual Fee payment and verify that the posted amounts are correct and paid on time. If necessary, they will assess late payment fees.

Costs of Administering the CTA Program

Some of the costs incurred to administer and oversee the CTA program are fixed and some vary depending on the number and type of complaints received.

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Fixed costs include the cost to Energy Division of administering the program as well as the cost to CAB of reviewing the Monthly CTA Complaint Report. These activities and associated costs do not vary materially with the number of CTA-related complaints received.

Costs associated with responding to complaints are variable and depend on the number and type of complaints received. These include CAB costs associated with receiving and attempting to resolve CTA-related consumer complaints and the cost of UEB investigations and enforcement actions.

The purpose of the CTA Annual Fee is to cover the CPUC's costs in administering the CTA program and responding to complaints. Resolution G-3580 divided the Annual Fee into a Base Fee and a Variable Fee. The Base Fee corresponds with fixed costs and is allocated to all CTAs equally. Since not all CTAs contribute equally to complaint-related costs, Resolution G-3580 determined that they should be allocated on a cost-causation basis. Individual CTAs thus incur a Variable Fee based on the number and type of complaints and enforcement actions attributed to them. If a CTA receives no complaints and is not the subject of any enforcement actions, it pays no Variable Fee.

For example, in 2025,³⁰ four CTAs—Big Tree Energy CA LLC, SFE Energy Inc., Wave Energy, and United Energy Trading LLC dba Collective Energy—generated 52 percent of all complaints. An additional 15 CTAs accounted for the remaining 48 percent of the complaints. CAB and UEB received no complaints for 18 CTAs. Two CTAs registered in 2026 and are thus not included in this total.

Every year, Energy Division staff calculate the compensation costs for CAB and UEB staff to respond to phone contacts and informal written complaints and to conduct investigations. Because these costs are incremental, it is reasonable to divide them

³⁰ The Annual Fee for the current year is based on the median staff salary, complaints, and actions or citations from the prior calendar year. Therefore, the Annual Fee for 2026 is based on what occurred in 2025.

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proportionally amongst the CTAs who were the subject of complaints or enforcement actions. This results in a more reasonable and fair allocation of costs that better aligns an individual CTA's Annual Fee with the actual administrative costs associated with that CTA.³¹

2026 Base Fee

The Base Fee reflects the compensation costs for the positions involved in the management and administration of the program. To make the Base Fee more stable over time, compensation costs are calculated using the median³² of the salary range for the relevant position plus employee benefit costs during the most recent fiscal year, in this case 2024-2025.³³ The compensation costs are then multiplied by the average amount of time the position is involved in activities required for the CTA program.

For Energy Division, in 2025 these costs included two staff, one Public Utilities Regulatory Analyst (PURA) I at 100 percent time and one Public Utilities Regulatory Analyst (PURA) II at 37.5 percent time, and one Program and Project Supervisor (PPS) at 15 percent time. For CAB, the base cost includes the cost of a PURA III who allocates approximately 0.6 percent of their time to the Monthly CTA Complaint Reports.

The total of these costs is shared equally by each CTA according to the formula below:

Base Fee per CTA = Total Fixed Costs ÷ Number of Registered CTAs

³¹ The Base Fee includes the sum of the fixed costs over the most recent 12-month period July 1 through June 30, in this case fiscal year 2023-2024. The Variable Fee covers the variable costs for the 12-month period January 1 through December 31, 2024, based on the number and type of complaints received and the costs incurred by the CPUC in resolving those complaints and pursuing enforcement actions.

³² Median amount is the average of the min and max range of the CALHR pay scale range for each classification.

³³ Position compensation costs are based on the median salary plus benefits for the level of the staff assigned to the program.

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The fiscal year 2024-2025 Total Fixed Costs used for this report are \$212,491.17 divided evenly amongst the 39 CTAs (see Table 1).³⁴

Table 1: Fixed Costs for Fiscal Year 2024-2025 (2026 CTA Annual Report)

CPUC Organizational Area	Position	Median Salary + Benefits	% Time on CTAs	# of CTAs	CTA Cost
Energy Division	PURA I	\$120,244.92	100%		\$120,244.92
Energy Division	PURA II	\$142,304.85	37.5%		\$53,364.32
Energy Division	PPS	\$252,848.67	15%		\$37,927.30
Consumer Affairs Branch	PURA III	\$159,105.71	0.6%		\$954.63
Total Base Cost					\$212,491.17
Base Cost Per CTA				39	\$5,448.49

In Resolution G-3597, the CPUC set the Base Fee at \$5,000 and determined that it would remain at that level in future years unless actual administrative costs are 20 percent higher or lower than \$5,000. Creating a set Base Fee with a tolerance band makes CTA fees more stable year-to-year while still providing the CPUC with the flexibility to respond to inflation or changes in personnel costs. If staff find that administrative costs are outside the 20 percent tolerance band in the *CTA Annual Report*, staff will submit a resolution to change

³⁴ Small discrepancies related to rounding may be found in the calculations in this report.

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the fee. Since the fixed costs for 2025 are within 20 percent of \$5,000, there is no change to the Base Fee.

2026 Variable Fee

Variable costs for CTA-related consumer protections reflect the hours CAB and UEB spent responding to consumer complaints and pursuing consumer protection actions in the previous calendar year. Thus, the Variable Fee has two parts: one for CAB and one for UEB. For CAB, these costs vary by the number and type of complaints received. For UEB they vary by the number of unauthorized enrollment complaints received and the number of UEB actions. For 2026, the combined variable costs for CAB and UEB totaled \$782,746.16 as shown in Table 2 below.

Table 2: 2025 Total Variable Costs

CPUC Organizational Area	CTA Costs
CAB	\$178,106.91
UEB	\$604,639.26
Total Variable Costs	\$782,746.16

Variable Fee: CAB

Consumers typically contact CAB for assistance when they do not receive a resolution from the

CTA's customer service department. During 2025, CAB received a total of 2,942³⁵ CTA-related complaints and inquiries, which is a 75 percent increase from the 1,685 complaints received in 2024. Of these, 2,067 were received by phone and 875 were informal written complaints. The cost of responding to a complaint varies based on the average time

³⁵ Energy Division acknowledges that CAB may collect the data more frequently than Energy Division, therefore, showing a discrepancy. CAB continuously updates the complaint information until the case has been officially closed. Therefore, the subject and number of complaints may reflect a discrepancy from CAB's Quarterly Reports. This complaint information was collected in February 2026.

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involved. Phone contacts are incoming calls from consumers seeking assistance with a CTA-related issue and require significantly less time to resolve than informal written complaints. Thus, they are less expensive (see Table 3 below). If the consumer is unable to resolve a problem with a CTA after receiving phone assistance, CAB encourages them to submit an informal written complaint. CAB submits informal written complaints to the CTA, which is required to provide a resolution in writing. CAB then informs the consumer of the outcome.

Table 3: 2025 Variable Cost by Complaint Type: CAB

	Complaints by Type	Average Hours per Complaint	Median Cost per Hour	Cost Per Complaint	Total Cost
Phone Contacts	2,067	0.11	\$53.99 ³⁶	\$5.94	\$12,276.70
Informal Written Complaints	875	3.51	\$53.99	\$189.52	\$165,830.21
Total	2,942				\$178,106.91

To calculate CAB costs, staff use the following methodology:

³⁶ Energy Division staff receive CAB's median cost per hour from the Administrative Services Division

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Cost per phone contact³⁷ multiplied by the CTA's number of phone contacts; plus,

Cost per informal written complaint multiplied by the CTA's number of informal written complaints.

For the 2026 fee, the cost per Phone Contact is \$5.94, and the cost per Informal Written Complaint is \$189.52.

Variable Costs: UEB

The second factor in the Variable Fee is the cost of the investigation and citation programs conducted by the Utility Enforcement Branch. UEB staff are responsible for investigating allegations of unauthorized enrollment and identifying trends in complaints pursuant to Resolution UEB-003,³⁸ issuing citations, and collecting fines. To calculate total UEB costs, staff use the median salary and benefits for each staff position involved with the CTA program multiplied by the percentage of time each person spent on CTA-related investigations in the preceding year³⁹ as shown in Table 4 below.

In 2025, UEB assigned an additional PURA I to the CTA Program. Additionally, in order to keep up with the increased number of investigations, the percentage of staff time specifically dedicated to CTAs increased across senior analyst staff levels.

Table 4: 2026 Variable Cost: UEB

Position	Median Annual Salary + Benefits	% Time on CTAs	CTA Cost
PM	\$291,390.15	20%	\$58,278.03
PPS	\$252,848.67	30%	\$75,854.60

³⁷ CAB maintains statistics concerning the time associated with phone contacts and informal written complaints.

³⁸ UEB-003: [236850987.PDF \(ca.gov\)](#).

³⁹ There are additional CAB variable costs that can only be estimated. These are considered to be less than \$500 and are not included in this analysis. Additionally, there are costs associated with the citations generated by the Utility Enforcement Branch that cannot be reliably estimated at this time.

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PURA V	\$191,956.13	15%	\$28,793.42
PURA IV	\$174,732.67	40%	\$69,893.07
PURA III	\$159,105.71	50%	\$79,552.86
PURA III	\$159,105.71	60%	\$95,463.43
PURA II	\$142,304.85	20%	\$28,460.97
PURA I	\$120,244.92	70%	\$84,171.44
PURA I	\$120,244.92	70%	\$84,171.44
Total			\$604,639.26

In Resolutions G-3580 and G-3589, adopted in 2021 and 2022 respectively, the CPUC allocated UEB costs evenly for all complaint types. The rationale was that UEB staff review all CTA-related complaints to identify allegations of unauthorized enrollment and trends in the complaints. In G-3597, adopted in 2023, the CPUC made two changes to the methodology to more precisely allocate UEB costs. First, UEB costs are allocated only to those CTAs who were the subject of alleged unauthorized enrollment complaints since that is UEB’s focus. Second, the resolution adopted a method that divides UEB costs between time spent investigating allegations of unauthorized enrollment and time spent pursuing enforcement actions. The allocation methodology is as follows:

- Disaggregate total UEB costs between enforcement actions and alleged unauthorized enrollment investigations by dividing the number of UEB actions by the number of unauthorized enrollment complaints.
- Multiply the resulting percentage by total UEB costs to determine the amount to allocate towards enforcement.

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- Allocate the remainder toward alleged unauthorized enrollment complaint investigations.
- Divide alleged unauthorized enrollment investigation costs equally per unauthorized enrollment complaint.
- Divide enforcement actions costs equally per UEB action.

In 2025, UEB staff reviewed 2,942 CTA-related complaints and identified 818 unauthorized enrollment complaints for further investigation. This is an 88 percent increase compared to the 435 such complaints investigated in 2024. With regards to enforcement actions, UEB staff issued 55 CTA-related citations totaling \$55,000^{40,41} as well as five warning notices, two requests for action, one notice of citation, one cease-and-desist letter, and one administrative consent order. The 65 total enforcement actions represent an 83 percent decrease compared to the 393 such actions in 2024.

- 65 enforcement actions ÷ 818 total alleged unauthorized enrollment complaints resulted in 8 percent of costs allocated to enforcement actions and 92 percent allocated to overall unauthorized enrollment complaints.⁴²
- Total enforcement actions: $8\% * \$604,639.26 = \$48,045.91$
- Total alleged unauthorized enrollment complaints: $92\% * \$604,639.26 = \$556,593.35$
- Enforcement: $\$48,046 \div 65 \text{ UEB actions} = \$739.17 \text{ per action}$
- Alleged unauthorized enrollment investigations: $\$556,593 \div 818 \text{ complaints} = \$680.43 \text{ per complaint}$

⁴⁰ The Fiscal Office collects citation payments and deposits them into the State's General Fund.

⁴¹ A list of CTA citations can be found on the bottom of the UEB Citation website: [Energy Citation Programs](#).

⁴² Percentages and total costs are rounded to the nearest whole number.

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In 2026, the cost for alleged unauthorized enrollment investigation is \$680.43 per unauthorized enrollment complaint, and the cost for enforcement is \$739.17 per UEB action.

2026 Annual Fee

The Annual Base Fee for the CTA program is \$5,000.

The 2026 Variable Fee for CAB-related costs is \$5.94 per Phone Contact and \$189.52 per Informal Written Complaint. The Variable Fee for UEB-related costs is \$680.43 per unauthorized enrollment complaint and \$739.17 per enforcement action. The total Annual Fees owed by each CTA are detailed in Appendix 1 below, which includes both the Base Fee and the Variable Fee. CTAs who receive no complaints do not pay a Variable Fee.

The CPUC Administrative Law Judge Division, Legal Division, and Fiscal Division incurred costs for the CTA program that were not examined for this year but could be included in future years if substantive.

APPENDIX A-1: 2026 ANNUAL FEE FOR EACH CTA⁴³

CTA	Phone Contacts	Informal Complaints	Unauthorized Enrollment Complaints	UEB Actions	Phone Contact Cost	Informal Complaint Cost	UEB Investigation Cost	UEB Action Cost	Variable Fee	Base Fee	Total Fee (Base + Variable)
AAA Natural Gas	157	78	88	0	\$932.48	\$14,782.58	\$59,878.01	\$0.00	\$75,593.07	\$5,000.00	\$80,593.07
Ambit California LLC	4	1	1	0	\$23.76	\$189.52	\$680.43	\$0.00	\$893.71	\$5,000.00	\$5,893.71
Anew RNG LLC dba Elements Markets Renewable Energy LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Big Tree Energy CA LLC	182	84	95	5	\$1,080.97	\$15,919.70	\$64,641.04	\$3,695.84	\$85,337.54	\$5,000.00	\$90,337.54
Bolt Energy Services LLC	4	3	8	1	\$23.76	\$568.56	\$5,443.46	\$739.17	\$6,774.94	\$5,000.00	\$11,774.94
BP Energy Company	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
BP Energy Retail Company	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00

⁴³ The CPUC acknowledges that the use of Excel may result in rounding discrepancies less than or equal to five dollars.

CTA	Phone Contact s	Informal Complaint s	Unauthorize d Enrollment Complaints	UEB Actions	Phone Contact Cost	Informal Complaint Cost	UEB Investigatio n Cost	UEB Action Cost	Variable Fee	Base Fee	Total Fee (Base + Variable)
LLC (Formerly EDF Energy Services LLC)											
Calpine Energy Solutions LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Clean Energy Renewable Fuels LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Commercial Energy of Montana Inc	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Constellation NewEnergy - Gas Division LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Direct Energy Business LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Everyday Energy LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
GHI Energy LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Greenwave	39	41	10	0	\$231.64	\$7,770.33	\$6,804.32	\$0.00	\$14,806.29	\$5,000.00	\$19,806.29

CTA	Phone Contact s	Informal Complaint s	Unauthorize d Enrollment Complaints	UEB Actions	Phone Contact Cost	Informal Complaint Cost	UEB Investigatio n Cost	UEB Action Cost	Variable Fee	Base Fee	Total Fee (Base + Variable)
Energy LLC											
Interstate Gas Supply Inc	1	0	0	0	\$5.94	\$0.00	\$0.00	\$0.00	\$5.94	\$5,000.00	\$5,005.94
Just Energy Solutions Inc.	9	4	5	1	\$53.45	\$758.08	\$3,402.16	\$739.17	\$4,952.86	\$5,000.00	\$9,952.86
Lumeo Ventures, LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Mansfield Power and Gas LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Median Energy CA LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Mirabito Natural Gas LLC dba Evergreen Gas & Electric	59	3	14	0	\$350.42	\$568.56	\$9,526.05	\$0.00	\$10,445.03	\$5,000.00	\$15,445.03
National Gas & Electric LLC	8	3	2	0	\$47.52	\$568.56	\$1,360.86	\$0.00	\$1,976.94	\$5,000.00	\$6,976.94
North Star Gas Company LLC	4	4	4	1	\$23.76	\$758.08	\$2,721.73	\$739.17	\$4,242.73	\$5,000.00	\$9,242.73

CTA	Phone Contact s	Informal Complaint s	Unauthorize d Enrollment Complaints	UEB Actions	Phone Contact Cost	Informal Complaint Cost	UEB Investigatio n Cost	UEB Action Cost	Variable Fee	Base Fee	Total Fee (Base + Variable)
dba YEP Energy											
NRG Business Marketing LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Pacific Summit Energy LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Peak Six Power and Gas LLC	61	16	17	0	\$362.30	\$3,032.32	\$11,567.34	\$0.00	\$14,961.97	\$5,000.00	\$19,961.97
SFE Energy Inc.	380	151	121	0	\$2,256.96	\$28,617.56	\$82,332.27	\$0.00	\$113,206.79	\$5,000.00	\$118,206.79
Shell Energy North America (US) L.P.	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Smart One Energy LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Spark Energy Gas LLC	86	91	53	7	\$510.79	\$17,246.34	\$36,062.89	\$5,174.17	\$58,994.20	\$5,000.00	\$63,994.20
StateWise Energy California LLC	205	71	73	1	\$1,217.57	\$13,455.94	\$49,671.53	\$739.17	\$65,084.21	\$5,000.00	\$70,084.21
Think Natural Gas LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00

CTA	Phone Contact s	Informal Complaint s	Unauthorize d Enrollment Complaints	UEB Actions	Phone Contact Cost	Informal Complaint Cost	UEB Investigatio n Cost	UEB Action Cost	Variable Fee	Base Fee	Total Fee (Base + Variable)
Tiger Natural Gas Inc.	4	0	1	0	\$23.76	\$0.00	\$680.43	\$0.00	\$704.19	\$5,000.00	\$5,704.19
Trillium USA Company LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
United Energy Trading LLC dba Collective Energy	179	126	77	2	\$1,063.15	\$23,879.55	\$52,393.26	\$1,478.34	\$78,814.30	\$5,000.00	\$83,814.30
Viridian Energy PA LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Vista Energy Marketing L.P.	138	38	47	4	\$819.63	\$7,201.77	\$31,980.30	\$2,956.67	\$42,958.38	\$5,000.00	\$47,958.38
Wave Energy LLC	539	158	200	43	\$3,201.33	\$29,944.20	\$136,086.39	\$31,784.22	\$201,016.13	\$5,000.00	\$206,016.13
XOOM Energy California LLC	8	3	2	0	\$47.52	\$568.56	\$1,360.86	\$0.00	\$1,976.94	\$5,000.00	\$6,976.94
TOTAL	2067	875	818	65	\$12,276.70	\$165,830.21	\$556,593.35	\$48,045.91	\$782,746.16	\$195,000.00	\$977,746.16