

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Item #18 (Rev. 1)

ENERGY DIVISION

Agenda ID # 24329
RESOLUTION E-5468
July 16, 2026

R E S O L U T I O N

Resolution E-5468. Approve with modifications the joint Tier 3 Advice Letter of Southern California Edison Company (AL 5707-E), Pacific Gas and Electric Company (AL 7783-E), San Diego Gas and Electric Company (AL 4770-E), and Southern California Gas Company (AL 6570-G)

PROPOSED OUTCOME:

- Approve with modifications the joint Tier 3 Advice Letter of Southern California Edison Company (SCE) (AL 5707-E), Pacific Gas and Electric Company (PG&E) (AL 7783-E), San Diego Gas and Electric Company (SDG&E) (AL 4770-E), and Southern California Gas Company (SoCalGas) (AL 6570-G)

SAFETY CONSIDERATIONS:

- There are no safety considerations associated with this resolution.

ESTIMATED COST:

- This Resolution is expected to lead to minimal increased costs in the Disconnections Memorandum Account.

By Advice Letter 5707-E, 4770-E, 7783-E, and 6570-G, filed on
December 17, 2025

SUMMARY

This Resolution approves with modifications the joint request of Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric Company (SDG&E), and Southern California Gas Company (SoCalGas) (together, the Joint IOUs) to adjust the temperature thresholds that halt disconnections,

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pursuant to Decision (D.) 25-06-012, which required the submission of a Tier 3 Advice Letter (AL) detailing their plans and timeline.

BACKGROUND

In Phase I of the Disconnections Rulemaking (R.) 18-07-005, the Commission adopted statewide extreme weather disconnection protections. On June 16, 2020, the Commission issued D.20-06-003, which established that residential electric customers may not be disconnected for non-payment when local temperatures above 100° Fahrenheit (F) or below 32°F are forecast within a 72-hour look-ahead period.¹ This rule made permanent an interim moratorium on disconnections during extreme weather from D.18-12-013, reflecting the Commission's recognition that loss of power during temperature extremes poses serious public health risks. Moreover, the Commission permitted the Joint IOUs to continue using their own internal weather monitoring systems to meet the requirement.

On October 30, 2024, the Assigned Commissioner issued an Amended Phase 2 Scoping Memo and Ruling in R.18-07-005, expanding the proceeding's scope to include "disconnection protections under extreme weather conditions."² The Amended Scoping Memo formally added The Utility Reform Network's ([TURN's](#)) extreme heat issues to Phase 2 and set forth a process to develop the record. Amidst multiple heat waves in August 2024, TURN filed an Emergency Motion in R.18-07-005, urging the Commission to strengthen disconnection protections during extreme heat events.³ TURN argued that the existing 100°F statewide threshold was too high and not tailored to local climate norms, leaving many customers unprotected during dangerous heat conditions.

On June 12, 2025, the Commission issued D.25-06-012, addressing, among other topics, the extreme heat protection proposals. In D.25-06-012, rather than immediately adopting specific temperature thresholds or specific heat risk measures, the Commission set in motion a collaborative process to refine the protections. The Decision acknowledged that additional disconnection safeguards are needed for extreme heat events and directs utilities to develop those measures in coordination with interested parties. Ordering Paragraph (OP) 4 of D.25-06-012 required the Joint IOUs to ~~jointly~~ submit a Tier 3 AL within six months of the Decision proposing adjusted "heat-

¹ D.20-06-003 at OP 1.

² Amended Scoping Memo at 4.

³ TURN's Emergency Motion To Modify Weather-Related Disconnection Protections to Better Address "Extreme Heat" Health and Safety Risks, filed August 14, 2024.

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triggered” disconnection thresholds.

On behalf of SCE, PG&E, and SDG&E (together, the Electric IOUs), and SoCalGas, SCE has submitted this Tier 3 AL to propose an approach for adjusting the temperature thresholds that require halting disconnections, taking into account relative heat risks.

The Joint IOUs propose halting disconnections when the 72-hour forecast CalHeatScore index reaches level 3 or higher, designating a “high” impact level.

CalHeatScore (CHS) was developed pursuant to Assembly Bill (AB) 2238 by the California Office of Environmental Health Hazard Assessment (OEHHA) to provide a heat risk ranking system available to the public by January 1, 2025. The CalHeatScore index ranks heat risk by analyzing historical data that connects climate patterns to impacts on human health throughout California. This approach uses specific climate and health datasets to measure these relationships at the zip code level. Apparent temperature (heat index) ranges identified based on these relationships are then used to assign scores that reflect varying degrees of heat-related health risk.⁴

CHS is a metric that quantifies relative heat exposure across different regions, allowing for the establishment of region-specific thresholds for disconnection suspensions. CHS offers a simple, easily implementable index that summarizes heat risk for each California zip code into a single measure. CHS incorporates maximum apparent temperature, commonly known as heat index. This measure “quantifies how current temperature conditions feel to the human body”⁵ which are a function of both air temperature and humidity.

CHS uses the NOAA NWS definition of apparent temperature.⁶ On the health data side, CHS employs data on emergency department visits due to heat related illness from the California Department of Health Care Access and Information (HCAI). The heat-health models underlying CHS link the highest apparent temperature recorded each day to the number of emergency department visits that occur on that day at the zip code level. Based on the model’s results, a Relative Risk value is determined, which indicates how

⁴ See CalHeatScore Methods Documentation, available at <https://calheatscore.calepa.ca.gov/sites/default/files/2025-02/methods02032025.pdf>. <https://calheatscore.calepa.ca.gov/sites/default/files/2025-02/methods02032025.pdf>.

⁵ Id., p. 2.

⁶ Id., p. 3.

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the rate of emergency department visits for a specific day and zip code differs from the typical rate under average weather conditions.

CHS documentation provides a figure of a sample zip code showing that CHS Level 1 equates to an apparent temperature between 85 to 94 degrees, Level 2 equates to an apparent temperature range of approximately 94 to about 98 degrees,⁷ Level 3 equates to an apparent temperature range of approximately 98 to 101 degrees for the same zip code.⁸ CHS Level 4 is equivalent to an apparent temperature of over 102 degrees.⁹ As defined by heat-related emergency room visits, CHS Level 1 reflects a 0 to 33 percent increase, while CHS Level 2 reflects a 33 to 66 percent increase, CHS Level 3 reflects a 67 to 100 percent, and CHS Level 4 reflects a 200% percent increase relative to heat-related emergency room visits relative to baseline conditions.¹⁰

The Joint IOUs argue that Level 3 on the CHS scale is the appropriate trigger for disconnection protections because it reflects conditions that pose a significant health risk. The 72-hour look ahead period would ensure that protections extend to adjacent days that likely register at Levels 2 or even 1, thereby providing additional coverage without lowering the threshold. They argue that moving the trigger to Level 2 would result in excessive activations, capturing many “mild impact” days (Level 1) and creating operational and cost burdens as well as further arrearage increases without a commensurate increase in public health benefit.

The Joint IOUs also considered the possibility that the CHS index may be temporarily unavailable due to unexpected circumstances. In that circumstance, the IOUs propose to keep the current maximum temperature threshold of 100° F in place as a fallback. For the interim period prior to the availability and adoption of CHS the Joint IOUs also plan on maintaining the 100° F trigger threshold for the interim period.

On April 20, 2026, the Joint IOUs submitted to Executive Director Leuwam Tesfai a six-month extension request to comply with D.25-06-012.¹¹

⁷ California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, CalHeatScore Methods Documentation, p. 6, <https://calheatscore.calepa.ca.gov/sites/default/files/2025-02/methods02032025.pdf>.

⁸ *Id.*

⁹ *Id.*

¹⁰ *Id.*

¹¹ Request of Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Gas Company, and Southern California Edison Company for Extension of Time to Comply with Decision (D.) 25-06-012, at 1.

On May 28, 2026, Utility Consumer Action Network (UCAN), Californians for Accessible Technology (CforAT), National Consumer Law Center (NCLC), and TURN (the Joint Consumer Advocates) filed an Emergency Motion in R.18-07-005. The Emergency Motion called for immediate Commission action to lower the temperature threshold for suspending disconnections and highlighted the urgent need for enhanced extreme heat protections in summer 2026.¹² Specifically, the Emergency Motion urged the Commission to direct the IOUs to immediately lower the statewide temperature threshold for suspending disconnections from 100°F to 90°F. The Joint Consumer Advocates concurrently filed a motion to shorten time in order to facilitate a rapid resolution of the matter.¹³

NOTICE

Notice of Joint IOU Advice Letter (AL) 5707-E, 4770-E, 7783-E, and 6570-G was made by publication in the Commission's Daily Calendar. PG&E states that a copy of the AL was mailed and distributed in accordance with Section 4 of General Order 96-B to parties on the service list for R.18-07-005.

PROTESTS

The Joint IOU Advice Letter (AL) (5707-E, 4770-E, 7783-E, and 6570-G) was timely protested by the Utility Consumers' Action Network (UCAN), the Public Advocates' Office of the California Public Utilities Commission (Cal Advocates), The Utility Reform Network (TURN), and, jointly, the Center for Accessible Technology (CforAT) and National Consumer Law Center (NCLC).

UCAN protested the AL on three of the six grounds listed in GO 96-B. First, UCAN argued that the Advice Letter violates a Commission order by not changing the temperature thresholds that trigger disconnections suspensions. Secondly, the Advice Letter's "analysis, calculations, or data... contain material errors or omissions." Errors

¹² [R.18-07-005, "Emergency Motion of the Joint Consumer Advocates to Modify Weather-Related Disconnection](https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M607/K785/607785658.PDF)

[Protections to Better Address "Extreme Heat" Health and Safety Risks," May 28, 2026.](https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M607/K785/607785658.PDF)

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M607/K785/607785658.PDF>

¹³ [R.18-07-005, "Motion of the Joint Consumer Advocates to Shorten Time to Respond to the Emergency Motion on Extreme Heat," May 28, 2026.](https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M607/K364/607364702.PDF)

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M607/K364/607364702.PDF>

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or omissions of this kind are grounds for protest. Third, the Advice Letter requests unjust and unreasonable relief by requesting disconnection suspensions at CHS Level 3, which UCAN asserted fails to protect large segments of the population, including children and the elderly.

UCAN instead argued that the Commission should revise the fallback-temperature threshold, the interim-temperature threshold, and the backstop temperature threshold to 90 degrees. This aligns with the feedback that the parties supplied to the Joint IOUs in response to the Joint IOUs' proposal. Additionally, the CHS threshold should be set to Level 2 to ensure more expansive heat protections than the current 100-degree temperature threshold.

Cal Advocates protested the Joint AL on the grounds that the plan for implementation of these heat protections does not comply with the implementation date ordered in D.25-06-012 and that the proposal is unjust and unreasonable. Additionally, the CHS level at which the Joint IOUs propose to implement disconnections protections does not meet the requirements of D.25-06-012 and does not include necessary supporting analysis to justify this proposal.

Cal Advocates asserted that the Joint IOU proposal to have disconnection protections triggered at the threshold of CHS Level 3 lacks factual justification as required by D.25-06-012. Instead, Cal Advocates supports lowering the temperature threshold to 95 degrees [or less](#) as an interim measure.¹⁴

[Cal Advocates argues that maintaining the maximum threshold at 100 degrees does not have an empirical basis and the IOUs have not demonstrated how this choice would reduce health-related heat risks. Cal Advocates has provided recent data and numerous peer reviewed studies on temperature and risk that show that the threshold should be lower and that 100 degrees is dangerous to human beings.](#)¹⁵

TURN observed that the Joint IOU proposal would delay implementation of additional protections to mitigate the health impacts of extreme heat. Implementation by the Joint IOUs would not take effect until six months after the May 1, 2026 deadline established by D.25-06-012. TURN claimed that this is in violation of the Decision, which

¹⁴ The California Public Advocate's Office Protest to Joint Investor-Owned Utilities (IOUs) Advice Letter to Propose Region-Specific Heat Risk Protections (Joint IOUs' Protest), at 5.

¹⁵ [See Joint AL at attachment B-1 for Cal Advocates comments presenting research on temperature and heat risk.](#)

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established that this proposal *must* be implemented by May 1, 2026. Instead, TURN proposed that the Commission should require the Joint IOUs to implement a lower interim temperature threshold of 90 degrees, or at most 95 degrees as a threshold disconnections suspension if the CHS approach cannot be implemented by the May 1, 2026 deadline. In addition, TURN also proposed that the Commission require the Joint IOUs to take proactive steps to develop a zip-code based process so that they can implement CHS protections as soon as possible, once the data interface becomes available.¹⁶

As a CHS draft data interface was not yet available during the working group process, parties have not had an opportunity to review past data from the CHS tool and evaluate its impacts on disconnection days relative to the existing temperature threshold. In comments, UCAN, Cal Advocates, and TURN each requested data from the Joint IOUs regarding their threshold proposals.

The Joint IOUs have not presented this information in their Joint AL, nor have they provided it to the stakeholder working group members. Moreover, these parties propose that the Joint IOUs should be directed to present an analysis which estimates these impacts when establishing the protections threshold at CHS risk Level 2, Level 3, and the current 100-degree threshold. The Joint IOU AL emphasizes that the proposal would be low cost to implement. As stated by SCE and echoed by SDG&E, each “[b]udget projections show minimal incremental costs”.¹⁷ PG&E, however, does not discuss budget projections and instead anticipates “an increase in manual work for the development of connection and automation with the new CHS API.”¹⁸ TURN argues that, before the Joint IOUs are authorized to record incremental costs to their disconnection memorandum accounts, they should provide forecasts of such implementation costs.

CforAT and NCLC filed a joint protest. They agree with the Joint IOUs that it would be too costly and complex to set different thresholds throughout different parts of the state. Further, they propose that a single temperature cutoff should be 90 degrees in the interim until the CHS system is in place and assert that more analysis should be conducted on the appropriate protection level to set in the long term.¹⁹

¹⁶ Protest of The Utility Reform Network of The Joint IOUs’ Advice Letter (SCE Advice Letter No. 5707-E et al.) to Propose Region-Specific Heat Risk Protections Pursuant to D.25-06-012, at 3.

¹⁷ See Joint IOUs’ Protest.

¹⁸ *Id.*

¹⁹ CforAT and NCLC Protest of SCE Advice Letter No. 5707-E; SDG&E Advice Letter No. 4770-E; Pacific Gas & Electric Company Advice Letter No. 7783-E and SoCalGas Advice Letter No. 6570-G.

REPLY TO PROTESTS

On behalf of the Joint IOUs, SCE responded to the protests of UCAN, Cal Advocates, TURN, and CforAT/NCLC on January 13, 2026.

The Joint IOUs maintain that CHS Level 3 is the appropriate trigger for disconnection protections because it reflects conditions that pose a significant health risk, as defined by the CHS methodology. The Joint IOUs assert that this threshold would allow for prioritization of customers most at risk from extreme heat while minimizing the cost associated with more frequent or less targeted activations. The 72-hour look-ahead period provides protections that extend to days that may register at CHS Levels 2 or 1, providing additional coverage without lowering the threshold. The Joint IOUs' historical experience with heat protections has shown that the look-ahead period tends to double the number of protected days, therefore they contend that moving the trigger to Level 2 would result in excessive activations, capturing many mild impact days that result in added costs and increases in arrears without increasing public health benefits.²⁰

The Joint IOUs acknowledge limitations in historical data to assess the impacts of the CHS thresholds. There is currently no data available for a full year, nor for any time period prior to 2025, making historical comparison difficult, as 2025 may not be an average weather year.²¹ In light of these data limitations, Joint IOUs agree with CforAT, NCLC, and TURN in their recommendation for additional analysis once more data is available.²²

In addition to the CHS level, there were also absolute temperature ceilings proposed by all protestants, which would further expand the scope of disconnection suspensions. The Joint IOUs note that California's climate is varied, which is precisely why a regionalized approach makes more sense than a flat cut-off. While the Joint IOUs agree with the protestants that a fallback maximum temperature is needed in the event that the CHS tool becomes temporarily unavailable, they disagree with the proposal to add

²⁰ Joint Reply to Protests of Public Advocates Office at the California Public Utilities Commission, The Utility Reform Network, Center for Accessible Technology/National Consumer Law Center, and Utility Consumers' Action Network to Southern California Edison Company's Advice 5707-E, San Diego Gas & Electric Company's Advice 4770-E, Pacific Gas and Electric Company's Advice 7783-E, and Southern California Gas Company's Advice 6570-G (Joint IOU Reply to Protests).

²¹ *Id.* at 3.

²² For instance, TURN suggested starting deployment at Level 3 and then assessing it against Level 2 further down the line.

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an ongoing absolute temperature limit or ceiling to a CHS based measure, contending that this would contravene the regionalization of heat protections as required by the Decision.²³ Furthermore, Joint IOUs recommend that the Commission evaluate CHS level impacts once additional data is available and select the appropriate level of CHS as a single measure of heat risk. Joint IOUs have also proposed to maintain the current approved temperature thresholds of 100°F until CHS can be implemented.

To expedite the implementation, SCE will transition to a zip code-based approach once the AL is approved. However, due to competing system enhancements and resource constraints, the implementation timeline remains 4 to 6 months. SDG&E currently uses a sub-area approach rather than specific zip codes to issue moratoriums within its system. Each sub-area is linked to the zip code GIS coordinates. SDG&E estimated that it would need approximately six months from the time the CHS API becomes available, to complete evaluation, testing, and deployment. SDG&E's budget projections reflect minimal incremental costs as SDG&E can utilize the existing sub-area and zip code GIS coordinates structure.

PG&E's current system sets maximum heat and cold temperature limits at the city level. The proposed modifications would require transitioning to CHS Level 3 as a new threshold, setting a maximum temperature threshold of 100°F as a backstop, and maintaining cold-weather protection at 32°F. Since CHS functions at the zip code level, the zip codes for each city within PG&E territory will need to be identified. PG&E estimated that it will take up to 6 months after the CHS becomes available to implement the new heat protections.

To implement the new CHS solution, the final CHS dataset is required before beginning testing and deployment. This data is expected to be available in summer 2026, which is beyond the May 1, 2026, deadline. The Joint IOUs acknowledged that their respective legacy systems and operational structures differ, hence the variations in timelines and capabilities. In response to TURN's recommendation that the Commission require the Joint IOUs to provide a forecast of implementation costs, the Joint IOUs offered to provide a cost forecast in a subsequent AL once the CHS API is available and its requirements are clear.

As for the calls to lower the minimum temperature threshold during the summer of 2026, the Joint IOUs are opposed to a full two-phase deployment and prefer

²³ Joint IOU Reply to Protests at 4.

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implementing the CHS as the permanent solution once available. If the Commission directs an interim approach, the Joint IOUs supported a low-cost solution, such as lowering the current temperature threshold from 100°F to 95°F until CHS data is fully available and integration into legacy systems can occur.

DISCUSSION

The Commission has reviewed the Joint IOU AL and finds that it does not offer sufficient health protections for ratepayers. The Decision directed the Joint IOUs to file a Tier 3 AL to adjust the temperature thresholds that trigger disconnections suspensions within six months of the Decision's publication and to implement the proposal by May 1, 2026.²⁴

The Commission affirms that the existing 72-hour look-ahead period in advance of the appropriate temperature threshold should remain intact. ~~That being said~~However, we find that the Joint IOU proposed solution to maintain the 100-degree threshold for the interim period and as a backstop when CHS data is not available is not sufficiently low enough to ensure adequate health protections for customers during extreme heat events, as required by D.25-06-012. Moreover, we are not persuaded by the Joint IOUs' concerns regarding increased triggers and potential arrearages that could result from a lower temperature threshold.²⁵ The Decision directed the Joint IOUs to implement a proposal that would "lower the temperature or other relevant thresholds that trigger disconnections suspensions."²⁶

We agree with protestants that 90 degrees is an appropriate interim trigger threshold and direct each IOU to implement an interim trigger threshold of 90 degrees within a 72-hour lookahead period until the full CHS data is available and each IOU's system is able to implement the CHS API. Likewise, we find that this 90-degree trigger threshold is reasonable as a fallback temperature threshold in the event that the CHS system is temporarily unavailable. This 90-degree trigger threshold shall be effective immediately upon adoption of a final Resolution.

The Joint IOU proposal to retain the current threshold of 100 degrees would violate the Commission's clear direction D.25-06-012 and would conflict with the input of every non-IOU party. Further, the Commission concurs with the IOUs and CforAT/NCLC that

²⁴ Decision 25-06-012 at 2.

²⁵ Joint IOU Reply to Protests at 3.

²⁶ D.25.06-012 at 38.

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it is reasonable to avoid the costs and complexities of setting different thresholds in different areas of the state, and instead implementing a single interim temperature cutoff until such time as the CHS system is in place.

It stands to reason that a single threshold temperature level needs to be more protective of residents in areas of the state that are not accustomed to high temperatures, and who are at heightened risk of an extreme heat event that deviates substantially from the temperatures to which they are acclimated. Accordingly, the Commission concurs with CforAT/NCLC, UCAN, and TURN that the single statewide interim and fallback temperature threshold should be set at 90°F.²⁷ Given that a statewide temperature threshold fails to account for both regional temperature differences and the non-temperature factors which exacerbate health risks, a threshold of 90 degrees is appropriate to protect households in mountainous and coastal areas.

According to the state's Cal-Adapt climate tool, the extreme heat threshold is below 100 degrees in 41 of 58 counties (71%), and at or below 90 degrees in 14 counties (24%).²⁸ San Francisco County defines an extreme heat event as any day when temperatures exceed 85 degrees.²⁹ Further north, Del Norte County faces extreme heat when temperatures exceed 76.8 degrees.³⁰ Within counties, local cut-offs also vary and can be significantly lower than the county-level threshold.³¹ Therefore, we adopt an interim and fallback single statewide temperature threshold of 90 degrees in order to capture these broad regional variations.

As for the adoption of CHS, the Commission directs the Joint IOUs to adopt a Level 2 threshold, as we find that CHS Level 3 is not lower than the current 100-degree trigger threshold and therefore is not in compliance with D.25-06-012.

²⁷ The IOUs propose to keep the fallback protection level for any time that the CalHeatScore tool is temporarily unavailable at 100°F statewide. Joint AL at p. 9. This proposal would completely fail to provide any of the increased protection that is the goal of the entire exercise currently underway.

²⁸ See Cal-Adapt – Extreme Heat Days & Warm Nights tool, providing extreme heat thresholds for cities and counties throughout California, <https://cal-adapt.org/tools/extreme-heat>. “Emergency Motion of The Utility Reform Network to Modify Weather-Related Disconnection Protections to Better Address ‘Extreme Heat’ Health and Safety Risks” (August 14, 2024), R.18-07-005, p. 9.

²⁹ See City and County of San Francisco, “Extreme Heat and Health” (May 17, 2023), <https://www.sf.gov/reports/may-2023/extreme-heat-and-health>.

³⁰ See Cal-Adapt, <https://cal-adapt.org/tools/extreme-heat>.

³¹ For example, in San Luis Obispo County, the extreme heat threshold is 85 degrees in Morro Bay and 103.3 degrees in Paso Robles. Likewise, in Humboldt County, the extreme heat threshold is 76.9 degrees in Eureka and 97.8 degrees in Garberville. See Cal-Adapt, <https://cal-adapt.org/tools/extreme-heat>.

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As noted by the protestants, the Joint IOUs have failed to provide data or analysis to support the Joint IOU proposal for a CHS 3 threshold.³² CHS is a health-based metric that reflects the relationship between heat conditions and heat-related emergency department visits. CHS Level 2 equates to a 33 percent to 66 percent increase of heat-related emergency room visits compared to normal conditions.³³ By contrast, CHS Level 3 corresponds to conditions with a 67 percent to 100 percent increase above baseline levels. Accordingly, CHS Level 2 provides protections at an earlier stage of heat-related health risk.

CHS documentation also provides a figure of a sample zip code showing that CHS Level 2 equates to an apparent temperature range of about 94 to 98 degrees.³⁴ In contrast, for the same zip code, CHS Level 3 equates to an apparent temperature of about 98 to 101³⁵ degrees. The Commission previously determined that existing heat protections were insufficient.³⁶ Because a CHS Level 3 threshold would trigger protections only at a higher level of heat-related health risk and at temperatures similar to those associated with the existing protections, adopting a CHS Level 2 threshold is more consistent with the Commission's intent to expand heat protections pursuant to D.25-06-012.

On May 21, 2026, the CHS API was released.³⁷ Given that the IOUs have reported their

³² See Advice Letter Attachment C-2 (TURN Feedback), p. 1; Advice Letter Attachment C-3 (UCAN Feedback) p. 1. Utility Consumers' Action Network's Protest of Joint Investor-Owned Utilities (IOUs) Advice Letter to Propose Region-Specific Heat Risk Protections Pursuant to D.25-06-012, at 8. [California Public Advocates Office's Protest to Joint Investor-Owned Utilities \(IOUs\) Advice Letter to Propose Region-Specific Heat Risk Protections at pp. 6-7.](#)

³³ California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, CalHeatScore Methods Documentation at 8.

See: <https://calheatscore.calepa.ca.gov/sites/default/files/2025-02/methods02032025.pdf>.

³⁴ California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, CalHeatScore Methods Documentation, p. 6, <https://calheatscore.calepa.ca.gov/sites/default/files/2025-02/methods02032025.pdf>.

³⁵ California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, CalHeatScore Methods Documentation, p. 6, [Figure 1,](#)

<https://calheatscore.calepa.ca.gov/sites/default/files/2025-02/methods02032025.pdf>. [6, Figure 1:](#) <https://calheatscore.calepa.ca.gov/sites/default/files/2025-02/methods02032025.pdf>.

³⁶ See D.25-06-012 at 35: "The Commission will seek proposals that have a targeted focus on reducing customers' relative heat exposure, that rely on data and tools that are proven and consistently available and minimize cost and burden of implementation."

³⁷ "State Launches a New Feature to CalHeatScore to Make Extreme Heat Info Accessible to More Californians," California Environmental Protection Agency, May 21, 2026. <https://oehha.ca.gov/press-release/state-launches-newfeature-calheatscore-make-extreme-heat-info-accessible-more-californians>.

[ability to establish the new protections within six months of the API availability, the Commission directs the Joint IOUs to begin the implementation of CHS Level 2 within 6 months upon adoption of this final Resolution.](#)

The Commission directs the Joint IOUs to track the impact results of a CHS Level 2 trigger threshold on arrearages and directs each to submit a Tier 1 Advice Letter 12 months after beginning the implementation of CHS Level 2. This reporting requirement will be an annual requirement for three years, by which time the Commission will determine whether to continue the requirement.

The Commission further finds that a CHS-based trigger is preferable to a fixed statewide temperature threshold because CHS reflects ZIP code-specific heat-health relationships and local climatological conditions. Unlike a uniform temperature trigger, CHS is designed to identify heat conditions associated with elevated health risks in different regions of California. Therefore, adopting a CHS Level 2 threshold is more consistent with the Commission's intent in D.25-06-012 to expand heat protections for residential customers.

Pursuant to D.25-06-012, Conclusion of Law 9, the Joint IOUs may record the incremental costs incurred to implement this decision to their disconnection memorandum accounts.³⁸

[These provisions will not apply to SoCalGas. D.20-06-003 clearly limited the heat-triggered disconnection thresholds to electric IOUs by emphasizing that "\[e\]lectric energy IOUs cannot disconnect residential electricity customers when temperatures above 100 degrees or below 32 degrees are expected based on a 72-hour look ahead period" and that "\[g\]as utility IOUs cannot disconnect \[residential customers\] when temperatures are expected to be below 32 degrees based on a 72-hour look-ahead period."](#)³⁹

[Consistent with this framework, although OP 4 of D.25-06-012 references SoCalGas, the Joint AL indicated that SoCalGas, as a gas utility, remains subject only to the existing 32°F cold-weather protection threshold,⁴⁰ which no parties disputed in their protests. As](#)

³⁸ See D.25-06-012.

³⁹ D.20-06-003 at 14; see also D.20-06-003 at 143 (Conclusion of Law (COL) 8).

⁴⁰ Joint Advice Letter at 1 ("Although OP 4 of D.25-06-012 also names SoCalGas, as a gas utility SoCalGas is only subject to the current 32°F cold weather protection threshold under CoL 8 of D.20-06-003. For the same reason, the Electric IOUs are limiting this submission to electric Advice Letters only.").

such, SoCalGas will not be subject to the implementation, including the suspension of disconnections during extreme heat events or the associated annual Tier 1 Advice Letters with reporting requirements.

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 Commission requests that all parties stipulate to a shortened 7-day comment period, via email to Isaac.Tong@cpuc.ca.gov by June 24, 2026.

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.

On June 29, 2026, the Joint IOUs submitted timely comments for the Draft Resolution, expressing support for the approval of the modified Joint IOU proposal for extreme heat protection. They requested a CHS implementation deadline of six months following the issuance of a Final Resolution as well as clarification that heat-triggered disconnection thresholds do not apply to SoCalGas.⁴¹ We find these requested clarifications to be reasonable and have been incorporated them into the Final Resolution.

The Joint Consumer Advocates also submitted timely comments and strongly urged the Commission to adopt the Draft Resolution with the following four recommended clarifications and corrections:⁴²

⁴¹ Southern California Edison's The Electric IOUs and SoCalGas appreciate the Commission's action on their advice letters and support the Draft Resolution's approval of the modified IOU proposal for extreme heat protection at 2.

⁴² COMMENTS OF THE JOINT CONSUMER ADVOCATES ON DRAFT RESOLUTION E-5468 ISSUED IN RESPONSE TO SCE AL 5707-E ET AL, at 2.

- Acknowledge the Joint Consumer Advocates' Emergency Motion dated May 28, 2026, which called for immediate Commission action to lower the temperature threshold for disconnections protections over summer 2026.
- Clarify that the IOUs should implement the interim threshold of 90° F for halting disconnections immediately upon adoption of the resolution.
- Direct the IOUs to implement the CHS Level 2 protections within six months of resolution's adoption, in light of the fact that the CHS application programming interface (API) was released on May 21, 2026.
- Instruct the IOUs to include a summary of CHS implementation costs in their first Tier 1 AL compliance filing.

We concur with these proposed changes and have incorporated them into the Final Resolution.

Lastly, The Center for Biological Diversity, Central California Asthma Collaborative, the Greenlining Institute, and the Affordable Energy Campaign also jointly issued timely comments and concurred with the modifications to the Joint IOU Tier 3 ALs.⁴³ They submitted the following comments :

"Our organizations [...] request that the Commission modify draft Resolution E-5468 to: first, clarify that the adopted protections will not be suspended in three years; second, specifically include the evaluation of the adopted protections in a subsequent phase of Rulemaking 18-07-005 or its successor proceeding; and third, implement these additional public health protections as soon as possible.

..."⁴⁴

The Commission has reviewed these proposed changes and address them here. First, the Draft Resolution does not limit disconnection protections to three years, though the original language in the Resolution may have been ambiguous. We clarify here that the "three years" referenced in the draft resolution refers to the reporting requirement to track the impact results of a CHS Level 2 trigger threshold on arrearages, not a limit for disconnection protections. As for the second request, we note that the Tier 1 AL filing requirements provide sufficient information to evaluate these new heat trigger requirements over time and the Commission may elect to incorporate these evaluations

⁴³ Support on Draft Resolution E-5468- request No Sunset and Continued Monitoring at 1.

⁴⁴ Support on Draft Resolution E-5468- request No Sunset and Continued Monitoring at Page 2

in a future proceeding as necessary. Finally, with regard to the third recommendation, the Commission clarifies that the protection for the 90-degree trigger threshold to halt disconnections will go into effect immediately upon adoption of the Final Resolution by the Commission.

FINDINGS AND CONCLUSIONS

1. D.25-06-012 directed Pacific Gas & Electric (PG&E~~7~~), Southern California Edison (SCE~~7~~), San Diego Gas & Electric, (SDG&E~~7~~), and Southern California Gas Company (SoCalGas) to jointly file a Tier 3 Advice Letter (AL) with a proposal to adjust the temperature thresholds that trigger disconnections suspensions.
2. On December 17, 2025, PG&E, SCE, SDG&E, and SoCalGas filed joint Tier 3 AL 5707-E / 4770-E / 7783-E / 6570-G (Joint IOU AL) to request approval to adjust the current temperature threshold of 100 degrees for halting disconnections during extreme heat events to a new threshold of Level 3 that is reached within a 72 hour forecast period on the CHS, an index created by the California Office of Environmental Health Hazard Assessment pursuant to Assembly Bill (AB) 2238 (Rivas, 2022). Implementation shall occur within 6 months of adoption of a final Resolution.
3. On May 28, 2026, Utility Consumer Action Network (UCAN), Cal Advocates, The Utility Reform Network (TURN), Californians for Accessible Technology (C4AT) and National Consumer Law Center (NCLC) (collectively, Joint Consumer Advocates) filed an Emergency Motion in R.18-07-005, calling for immediate Commission action to direct the IOUs to immediately lower the statewide temperature threshold for suspending disconnections from 100 degrees Fahrenheit to 90 degrees in the summer of 2026. The Joint Consumer Advocates concurrently filed a motion to shorten time in order to facilitate a rapid resolution of the matter.
- ~~3.4.~~ CHS Level 1 equates to a range of approximately 85 to 94 degrees, Level 2 equates to a range of approximately 94 to 98 degrees, and Level 3 equates to a range of approximately 98 to 101 degrees.
- ~~4.5.~~ As defined by heat-related emergency room visits, CHS Level 1 reflects a 0 to 33 percent increase, while CHS Level 2 reflects a 33 to 66 percent increase and CHS Level 3 reflects a 67 to 100 percent increase relative to heat-related emergency room visits relative to baseline conditions.
- ~~5.6.~~ UCAN, CalJoint Consumer Advocates, ~~TURN, and CforAT / NCLC~~ filed timely protests to the Joint IOU AL, asserting that Level 3 is too high of a threshold.

SCE AL 5707-E, SDG&E AL 4770-E, PG&E AL 7783-E, SoCalGas AL 6570-G/ITO

- ~~6~~7. UCAN proposed using Level 2 as the trigger for disconnection protections, arguing that it better reflects consumer risk during heat events.
- ~~7~~8. TURN supports beginning with Level 3 but also recommended that the Commission require the Joint IOUs to provide data to compare the effect of Level 2 relative to Level 3.
- ~~8~~9. It is reasonable for CforAT and NCLC to request additional analysis and reporting after the Resolution is issued.
- ~~9~~10. It is reasonable for Cal Advocates to assert that the Joint IOUs cannot claim Level 3 offers adequate consumer protection without demonstrating its connection to health risk.
- ~~10~~11. The IOUs' proposal to use 100 degrees as the interim trigger threshold to halt disconnections and in the future as a backstop when CHS API data is unavailable is no different than the IOUs' practice prior to the issuance of D.25-06-012.
- ~~11~~12. A statewide temperature threshold fails to account for both regional temperature differences and the non-temperature factors which exacerbate health risks,
- ~~12~~13. UCAN, TURN, and CforAT/NCLC's proposal of interim measures that would lower the threshold from 100 to 90 degrees and as a backstop threshold when CHS API data is unavailable is reasonable.
- ~~13~~14. CHS is a metric that quantifies relative heat exposure across different regions, allowing for the establishment of region-specific thresholds for disconnection suspensions. CHS offers a simple, easily implementable index that summarizes heat risk for each California zip code into a single measure.
- ~~14~~15. It is reasonable to implement ~~OEEHA's~~OEHHA's CHS as the tool to pause disconnections during extreme heat events.
- ~~15~~16. It is reasonable ~~to that the Joint Electric IOUs~~ implement ~~the~~ CHS threshold at Level 2.
17. As it is a gas utility, SoCalGas is not subject to the implementation and reporting requirements associated with suspending disconnections during extreme heat events.

THEREFORE IT IS ORDERED THAT:

1. The ~~Joint Advice Letter (AL)~~ request of Pacific Gas and Electric Company, Southern California Edison Company ~~(AL 5707-E)~~, ~~Pacific Gas and Electric Company (AL 7783-E)~~, San Diego Gas and Electric Company ~~(AL 4770-E)~~, Electric IOUs and Southern California Gas Company ~~(AL 6540-G)~~ to propose

adjusting the trigger to waive disconnections from 100 degrees Fahrenheit to Level 3 on the CalHeatScore (CHS) index is ~~approved as~~ modified to Level 2. Implementation of CHS Level 2: by the Electric IOUs shall occur within 6 months of adoption of a final Resolution.

2. Because implementation of the proposal will extend beyond May 1, 2026, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric Company, ~~and Southern California Gas Company~~ shall set an interim and fallback threshold of 90 degrees Fahrenheit within a 72-hour look ahead period statewide to waive disconnections during extreme heat events when CHS API data is unavailable. This interim and fallback trigger threshold of 90 degrees Fahrenheit shall be effective immediately upon adoption of a final Resolution.
3. Pursuant to D.25-06-012, Conclusion of Law 9, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric ~~Company, and Southern California Gas~~ Company may record the incremental costs incurred to implement this decision to their Disconnections Memorandum Accounts.
4. Starting 12 months after the implementation of CHS by the joint IOUs, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric ~~Company, and Southern California Gas~~ Company shall report, on an annual basis, the impact results of a CHS Level 2 trigger threshold on arrearages, through a Tier 1 Advice Letter. This reporting requirement will continue for three years, by which time the Commission will determine whether to continue the requirement. The first Advice Letter filing shall include a summary of CHS implementation costs.

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 July 16, 2026; the following Commissioners voting favorably thereon:

SCE AL 5707-E, SDG&E AL 4770-E, PG&E AL 7783-E, SoCalGas AL 6570-G/ITO

Commissioner Signature blocks to be added
upon adoption of the resolution

Dated _____, at <Voting meeting location>, California
(EDTU will fill-out the date and location)