BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

Application of Liberty Utilities (CalPeco Electric) LLC (U 933-E) for Approval of Energy Assistance and California Alternate Rates for Energy Programs and Budgets for Program Years 2028-2033.	Application 26-06-008 (Filed April 30, 2026)
And Related Matters.	Application 26-06-009 Application 26-06-010 Application 26-06-011 Application 26-06-012 Application 26-06-013

ALPINE NATURAL GAS OPERATING COMPANY NO. 1, LLC (U 909-G) COMMENTS TO SCOPING MEMO FOR SUPPLEMENTAL APPLICANT TESTIMONY

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Dated: November 2, 2026

Application of Liberty Utilities (CalPeco Electric) LLC (U 933-E) for Approval of Energy Assistance and California Alternate Rates for Energy Programs and Budgets for Program Years 2028-2033.	Application 26-06-008 (Filed April 30, 2026)
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ALPINE NATURAL GAS OPERATING COMPANY NO. 1, LLC (U 909-G)
COMMENTS TO SCOPING RULING FOR SUPPLEMENTAL APPLICANT TESTIMONY

In accordance with the Assigned Commission's October 2, 2026, Scoping Memo and Ruling seeking supplemental applicant testimony, Alpine Natural Gas Operating Company No. 1, LLC (Alpine) submits its response to the issues directed specifically (3a-3c, 7 and 9) to Alpine Natural Gas.

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Introduction and Background:

My name is Michael Lamond. I am the Administrator for Alpine. I manage the Energy Savings Assistance ("ESA") and California Alternative Rates for Energy ("CARE") programs. My business address is 15 St. Andrews Rd., Suite 7, Valley Springs, CA 95252.

On June 12, 2026, the six small and multi-jurisdictional utilities ("SMJUs"), Liberty Utilities (CalPeco Electric) LLC, PacifiCorp, West Coast Gas Company Inc., Bear Valley Electric Service, Inc., Southwest Gas Corporation, and Alpine Natural Gas Operating Company No. 1, LLC filed separate applications to request approval and funding for their CARE and ESA programs for program years ("PY") 2028 – 2033. On July 13, 2026, the assigned Administrative Law Judge ("ALJ") issued a ruling consolidating the SMJUs' applications, set a prehearing conference ("PHC") and requiring parties to file a joint PHC statement. On July 20, 2026, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) filed a protest to the consolidated applications. On August 17, 2026 the SMJUs filed a joint PHC statement that did not include the positions of Cal Advocates. On August 21, 2026, the SMJUs filed an amended joint PHC statement that included the positions of Cal Advocates. A PHC was held on August 24, 2026, after the SMJUs filed a joint PHC statement on August 17, 2026, which was amended on August 21, 2026.

On October 02, 2026, the assigned Commissioner to the consolidated SMJU Applications for PY 2028-2033 CARE and ESA programs and budgets issued a Scoping Memo and Ruling. The Scoping Memo and Ruling set forth issues and the initial schedule of the consolidated proceedings. It also required the SMJUs to serve supplemental testimony to address scoping issues 3a – 3c, and 7-9 from the Scoping Memo and Ruling, as well as other issues not addressed in the SMJUs' original application. Alpine hereby submits this supplemental testimony.

SUPPLEMENTAL TESTIMONY:

3. Whether the proposed CARE program designs (including, but not limited to, administration, eligibility, enrollment, recertification, verification, capitation fees, reporting, marketing, education, and outreach) are reasonable and should be established, including:

   a. Whether modifications to eligibility-verification and recertification practices, including the percentage of participating customers required to verify, are reasonable;

      Alpine does not see a need to modify current eligibility-verification and recertification practices. Alpine supports the objective to reach high CARE participation rates, but the size of our service territory, and residential turnover make it hard to obtain qualified customers that will remain on the program.

   b. Whether modifications to the proposed CARE program designs are reasonable to minimize attrition and barriers to participation for eligible customers; and

      Alpine does not propose any modifications to CARE program designs. Alpine believes program designs are reasonable and does not create unwarranted barriers.

   c. Whether modifications to the CARE program designs should be adopted to address unexpected changes in enrollment, including contingency plans for under- or over-enrollment;

Alpine does not propose any modifications to unexpected changes in enrollment. Alpine believes current practices are adequate.

7. Whether modifications should be made to the proposed ESA program designs to appropriately balance maximizing bill savings and minimizing rate impacts on non-participants, while maintaining administratively simple and trackable program delivery, including:

   a. Whether the Commission should modify ESA program designs to prioritize measures that deliver greater lifetime bill savings relative to costs, as well as important health and safety measures, including, where applicable, cooling measures in high heat areas; and

   Alpine supports the Commission in prioritizing measures that deliver greater lifetime savings relative to costs as well as important health and safety measures. Alpine does not recommend modifications for PY 2028-2033 budget cycle, since the existing ESA measures reasonable and effective.

   b. Whether the Commission should modify the framework for evaluating ESA program cost-effectiveness, including the metrics used and any associated targets or guidelines;

   Alpine has no opinion.

9. Whether the SMJUs should be required to implement the Concurrent Application System (CAS) program created pursuant to Public Utilities Code 731 and D.23-05-006 in this cycle, and what is a reasonable plan for

the SMJUs' implementation of the CAS, including, but not limited to, developing a timeline, process, and budget;

At this time, Alpine does not currently support implementing the Concurrent Application System (CAS). The implementation of CAS for SMJU's should depend on the progress and participants in PG&E's Phase 1 portion of the program. Once Phase 1 is complete, Alpine will have a better understanding if its cost-justification for small utilities. Since CAS was not included in budget Cycle 2028-2033, Alpine lacks the financial capabilities to cover costs of new software, IT vendors, maintenance and more overhead Administration costs. Waiting for the subsequent budget cycle would be preferred since there is not a definitive budget in place on an unproven system.

Dated: November 2, 2026

Respectfully submitted,

By: _/s/ Michael Lamond __

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