

Appendix B

Program list extract from CEDARS, September 16, 2024.

Index	Program	Program Name	Status	PA
1	BAY_CS_PortfolioSupport	PORTFOLIO ADMIN-CODES & STANDARDS	New	BayREN
2	BAY_Equity_PortfolioSupport	PORTFOLIO ADMIN-EQUITY	New	BayREN
3	BAY_MS_PortfolioSupport	PORTFOLIO ADMIN-MARKET SUPPORT	New	BayREN
4	BAY_RA_PortfolioSupport	PORTFOLIO ADMIN-RESOURCE ACQUISITION	New	BayREN
5	BAYREN02	Multi Family	Active	BayREN
6	BAYREN02-A	BAMBE Electrification	Active	BayREN
7	BAYREN02_IDSM	MULTIFAMILY IDSM	New	BayREN
8	BAYREN03	Codes and Standards Program	Active	BayREN
9	BAYREN04	Water Upgrades Save	Active	BayREN
10	BAYREN05-A	Evaluation Measurement and Verification - BAYREN	Active	BayREN
11	BAYREN06	Commercial	Active	BayREN
12	BAYREN07	Green Labeling	Active	BayREN
13	BAYREN08	Single Family	Active	BayREN
14	BAYREN08_IDSM	SINGLE FAMILY IDSM	New	BayREN
15	BAYREN09	Climate Careers	New	BayREN
16	BAYREN10	Refrigerant Replacement	New	BayREN
17	BAYREN11	Integrated Energy Services	New	BayREN
18	BAYREN11_IDSM	INTEGRATED ENERGY SERVICES IDSM	New	BayREN
19	BAYREN12	Targeted Decarbonization Services	New	BayREN
20	BAYREN12_IDSM	TARGETED DECARBONIZATION SERVICES IDSM	New	BayREN
21	BAY_SW_HESC	SW Home Energy Score California	New	BayREN
22	BAY_SW_HESC_PA	SW Home Energy Score California - PA Costs	New	BayREN
23	CPSF_FS	CPSF Food Service	New	CPSF

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
24	EBCE01	Commercial Pay-for-Performance Energy Efficiency Program	New	EBCE
25	IREN-CS-001	C&S Training and Education Program	New	IREN
26	IREN-CS-002	C&S Technical Support Program	New	IREN
27	IREN-CS-PortfolioSupport	PORTFOLIO ADMIN-CODES & STANDARDS	New	IREN
28	IREN-EMV-001	IREN EM&V	New	IREN
29	IREN-Equity-PortfolioSupport	PORTFOLIO ADMIN-EQUITY	New	IREN
30	IREN-IDSM-Equity-001	Equity IDSM	New	IREN
31	IREN-MS-PortfolioSupport	PORTFOLIO ADMIN-MARKET SUPPORT	New	IREN
32	IREN-PUBL-001	Technical Assistance and Strategic Energy Planning Program	New	IREN
33	IREN-PUBL-002	Public Buildings NMEC Program	New	IREN
34	IREN-WET-001	WE&T Training and Education Program	New	IREN
35	IREN-WET-002	WE&T Workforce Development Program	New	IREN
36	MCE01	Multifamily Energy Savings	Active	MCE
37	MCE01c	Multifamily Strategic Energy Management	Active	MCE
38	MCE01d	Res Marketplace	New	MCE
39	MCE02a	Commercial Deemed	Active	MCE
40	MCE02b	Commercial Custom	Active	MCE
41	MCE02c	Commercial Strategic Energy Management	Active	MCE
42	MCE02d	Commercial Marketplace	Active	MCE
43	MCE02e	Commercial Equity	Transitioning	MCE
44	MCE08	Single Family Home Energy Savings	Active	MCE
45	MCE100	Integrated Demand Side Management (IDSM)	New	MCE
46	MCE101-Equity-PS	Equity Portfolio Support	New	MCE
47	MCE101-MS-PS	Market Support Portfolio Support	New	MCE
48	MCE101-RA-PS	Resource Acquisition Portfolio Support	New	MCE
49	MCE10a	Industrial Deemed	Active	MCE
50	MCE10b	Industrial Custom	Active	MCE

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
51	MCE10c	Industrial Strategic Energy Management	Active	MCE
52	MCE11a	Agricultural Deemed	Active	MCE
53	MCE11b	Agricultural Custom	Active	MCE
54	MCE11c	Agricultural Strategic Energy Management	Active	MCE
55	MCE16	Green Workforce Pathways	Active	MCE
56	MCE17	Commercial Equity	New	MCE
57	MCE97	CPUC EM&V	Active	MCE
58	MCE98	MCE EM&V	Active	MCE
59	PCE01	PCE FLEXmarket	New	PCE
60	PGE21002	Residential Energy Efficiency	Active	PGE
61	PGE21005	Residential New Construction	Active	PGE
62	PGE21007	California New Homes Multifamily	Active	PGE
63	PGE21011	Commercial Calculated Incentives	Active	PGE
64	PGE21012	Commercial Deemed Incentives	Active	PGE
65	PGE21014	Commercial Energy Advisor	Active	PGE
66	PGE210143	Hospitality Program	Active	PGE
67	PGE21015	Commercial HVAC	Active	PGE
68	PGE21021	Industrial Calculated Incentives	Active	PGE
69	PGE210210	Industrial Recommissioning Program	Active	PGE
70	PGE210212	Compressed Air and Vacuum Optimization Program	Active	PGE
71	PGE21022	Industrial Deemed Incentives	Active	PGE
72	PGE21024	Industrial Energy Advisor	Active	PGE
73	PGE21027	Heavy Industry Energy Efficiency Program	Active	PGE
74	PGE21031	Agricultural Calculated Incentives	Active	PGE
75	PGE21032	Agricultural Deemed Incentives	Active	PGE
76	PGE21034	Agricultural Energy Advisor	Active	PGE
77	PGE21051	Building Codes Advocacy	Active	PGE

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
78	PGE21053	Compliance Improvement	Active	PGE
79	PGE21054	Reach Codes	Active	PGE
80	PGE21055	Planning and Coordination	Active	PGE
81	PGE21056	Code Readiness	Active	PGE
82	PGE21061	Technology Development Support	Active	PGE
83	PGE21062	Technology Assessments	Active	PGE
84	PGE21063	Technology Introduction Support	Active	PGE
85	PGE21071	WE&T Integrated Energy Education and Training	Active	PGE
86	PGE21072	WE&T Connections	Active	PGE
87	PGE21073	WE&T Strategic Planning	Active	PGE
88	PGE21091	On-Bill Financing (excludes Loan Pool)	Active	PGE
89	PGE210911	On-Bill Financing Alternative Pathway	Active	PGE
90	PGE21092	Third-Party Financing	Active	PGE
91	PGE21093	New Financing Offerings	Active	PGE
92	PGE2110011	California Community Colleges	Active	PGE
93	PGE2110012	University of California/California State University	Active	PGE
94	PGE2110013	State of California	Active	PGE
95	PGE2110014	Department of Corrections and Rehabilitation	Active	PGE
96	PGE2110051	Local Government Energy Action Resources (LGEAR)	Active	PGE
97	PGE211025	Savings by Design (SBD)	Active	PGE
98	PGE_Ag_001	Agricultural Efficiency Program	Active	PGE
99	PGE_CEC_SEES	SEESP Funds Transfer to CEC	Active	PGE
100	PGE_Com_001	Grocery Efficiency Program	Active	PGE
101	PGE_Com_002	Laboratory Performance Efficiency Program	Active	PGE
102	PGE_Com_003	Commercial Efficiency Program	Active	PGE
103	PGE_Com_004	High Tech and Bio Tech Efficiency Program	Active	PGE
104	PGE_Com_005	Healthcare Efficiency Program	Active	PGE

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
105	PGE_Com_006	Summer Reliability Platform Administrator Placeholder	New	PGE
106	PGE_Com_007	Commercial Behavioral Program	New	PGE
107	PGE_Com_008	Multi-DER Placeholder	New	PGE
108	PGE_Com_EM	Commercial Energy Management Placeholder	New	PGE
109	PGE_Com_SmallBiz	Micro and Small Business Program	Active	PGE
110	PGE_Com_ZE	Zonal Electrification Placeholder (Commercial)	New	PGE
111	PGE_CS_Decarb	C&S Decarbonization Support Placeholder	New	PGE
112	PGE_CS_GRC_Overheads	GRC Labor Loaders - Codes and Standards	Active	PGE
113	PGE_CS_PortfolioSupport	Codes & Standards Portfolio Support PA Costs	Active	PGE
114	PGE_EMV	Evaluation Measurement and Verification	Active	PGE
115	PGE_EMV_001	PGE EM&V	Transitioning	PGE
116	PGE_EMV_002	CPUC EM&V	Transitioning	PGE
117	PGE_Equity_GRC_Overheads	GRC Labor Loaders - Equity	Active	PGE
118	PGE_Equity_PortfolioSupport	Equity Portfolio Support PA Costs	Active	PGE
119	PGE_ESA	Energy Savings Assistance	Active	PGE
120	PGE_Ind_001a	Industrial Strategic Energy Management - Food Processing	Active	PGE
121	PGE_Ind_001b	Industrial Strategic Energy Management - Manufacturing	Active	PGE
122	PGE_Ind_002	Petroleum and Chemical Efficiency Program	Active	PGE
123	PGE_Ind_003	Manufacturing and Food Processing Efficiency Program	Active	PGE
124	PGE_LoanPool	Financing Loan Pool Addition	Active	PGE
125	PGE_MS_GRC_Overheads	GRC Labor Loaders - Market Support	Active	PGE
126	PGE_MS_PortfolioSupport	Market Support Portfolio Support PA Costs	Active	PGE
127	PGE_OBFAP	On-Bill Financing Alternative Pathway	Transitioning	PGE
128	PGE_OtherPA_Admin	IOU REN/CCA Admin Costs	New	PGE
129	PGE_Portfolio_Oversight	ED Portfolio Oversight	Active	PGE
130	PGE_Pub_001	Central Coast Local Government Partnership	Active	PGE
131	PGE_Pub_002	Marin Local Government Partnership	Active	PGE

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
132	PGE_Pub_003	Redwood Local Government Partnership	Active	PGE
133	PGE_Pub_004	Central California Local Government Partnership	Active	PGE
134	PGE_Pub_005	San Mateo Local Government Partnership	Active	PGE
135	PGE_Pub_007	Sierra Local Government Partnership	Active	PGE
136	PGE_Pub_008	Sonoma Local Government Partnership	Active	PGE
137	PGE_Pub_009	Government and K-12 Comprehensive Program	Active	PGE
138	PGE_Pub_010	Wastewater Process Efficiency Program	Active	PGE
139	PGE_Pub_011	California Analysis Tool for Locational Energy Assessment	New	PGE
140	PGE_Pub_Resiliency	Resiliency Support Placeholder (Public)	New	PGE
141	PGE_RA_GRC_Overheads	GRC Labor Loaders - Resource Acquisition	Active	PGE
142	PGE_RA_PortfolioSupport	Resource Acquisition Portfolio Support PA Costs	Active	PGE
143	PGE_Res_001a	Pay for Performance - Comfortable Home Rebates	Active	PGE
144	PGE_Res_001b	Virtual Energy Audit Program	Active	PGE
145	PGE_Res_001c	Pay for Performance - Home Energy Rewards	Active	PGE
146	PGE_Res_001d	Pay for Performance - Home Energy Optimization	Active	PGE
147	PGE_Res_002a	Universal Audit Tool Program	Active	PGE
148	PGE_Res_002d	Residential Behavioral Program	Active	PGE
149	PGE_Res_002e	Online Marketplace Program	New	PGE
150	PGE_Res_Equity	Residential Equity Placeholder	New	PGE
151	PGE_Res_LoadMgt	Residential Load Management Placeholder	New	PGE
152	PGE_Res_Mkt_Spt	Residential Market Support Placeholder	New	PGE
153	PGE_Res_Resiliency	Resiliency Support Placeholder (Residential)	New	PGE
154	PGE_Res_ZE	Zonal Electrification Placeholder (Residential)	New	PGE
155	PGE_SW_CSA_Appl	State Appliance Standards Advocacy	Active	PGE
156	PGE_SW_CSA_Appl_PA	State Appliance Standards Advocacy - PGE Costs	Active	PGE
157	PGE_SW_CSA_Bldg	State Building Codes Advocacy	Active	PGE
158	PGE_SW_CSA_Bldg_PA	State Building Codes Advocacy - PGE Costs	Active	PGE

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
159	PGE_SW_CSA_Natl	National Codes & Standards Advocacy	Active	PGE
160	PGE_SW_CSA_Natl_PA	National Codes & Standards Advocacy - PGE Costs	Active	PGE
161	PGE_SW_ETP_Elec	Emerging Technologies Program, Electric	New	PGE
162	PGE_SW_ETP_Elec_PA	Emerging Technologies Program, Electric - PGE Costs	New	PGE
163	PGE_SW_ETP_Gas	Emerging Technologies Program, Gas	Active	PGE
164	PGE_SW_ETP_Gas_PA	Emerging Technologies Program, Gas - PGE Costs	Active	PGE
165	PGE_SW_FS	Food Service POS	Active	PGE
166	PGE_SW_FS_PA	Food Service POS - PGE Costs	Active	PGE
167	PGE_SW_HVAC_QIQM	Statewide Residential QI/QM	New	PGE
168	PGE_SW_HVAC_QIQM_PA	Statewide Residential QI/QM - PGE Costs	New	PGE
169	PGE_SW_HVAC_Up_Com	SW HVAC Upstream Commercial	New	PGE
170	PGE_SW_HVAC_Up_Com_PA	SW HVAC Upstream Commercial - PGE Costs	New	PGE
171	PGE_SW_HVAC_Up_Res	SW HVAC Upstream Residential	New	PGE
172	PGE_SW_HVAC_Up_Res_PA	SW HVAC Upstream Residential - PGE Costs	New	PGE
173	PGE_SW_IP_Colleges	Institutional Partnerships, UC/CSU/CCC	Active	PGE
174	PGE_SW_IP_Colleges_PA	Institutional Partnerships, UC/CSU/CCC - PGE Costs	Active	PGE
175	PGE_SW_IP_Gov	Institutional Partnerships: DGS and DoC	Active	PGE
176	PGE_SW_IP_Gov_PA	Institutional Partnerships: DGS and DoC - PGE Costs	Active	PGE
177	PGE_SW_MCWH	Midstream Comm Water Heating	Active	PGE
178	PGE_SW_MCWH_PA	Midstream Comm Water Heating - PGE Costs	Active	PGE
179	PGE_SWMEO	Statewide Marketing Education and Outreach	Active	PGE
180	PGE_SW_NC_NonRes_Ag_electric	SW New Construction NonRes Ag - All Electric	Active	PGE
181	PGE_SW_NC_NonRes_Ag_electric_PA	SW New Construction NonRes Ag - All Electric - PGE Costs	Active	PGE
182	PGE_SW_NC_NonRes_Ag_mixed	SW New Construction NonRes Ag - Mixed Fuel	Active	PGE
183	PGE_SW_NC_NonRes_Ag_mixed_PA	SW New Construction NonRes Ag - Mixed Fuel - PGE Costs	Active	PGE
184	PGE_SW_NC_NonRes_Com_electric	SW New Construction NonRes Com - All Electric	Active	PGE
185	PGE_SW_NC_NonRes_Com_electric_PA	SW New Construction NonRes Com - All Electric - PGE Costs	Active	PGE

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
186	PGE_SW_NC_NonRes_Com_mixed	SW New Construction NonRes Com - Mixed Fuel	Active	PGE
187	PGE_SW_NC_NonRes_Com_mixed_PA	SW New Construction NonRes Com - Mixed Fuel - PGE Costs	Active	PGE
188	PGE_SW_NC_NonRes_Ind_electric	SW New Construction NonRes Ind - All Electric	Active	PGE
189	PGE_SW_NC_NonRes_Ind_electric_PA	SW New Construction NonRes Ind - All Electric - PGE Costs	Active	PGE
190	PGE_SW_NC_NonRes_Ind_mixed	SW New Construction NonRes Ind - Mixed Fuel	Active	PGE
191	PGE_SW_NC_NonRes_Ind_mixed_PA	SW New Construction NonRes Ind - Mixed Fuel - PGE Costs	Active	PGE
192	PGE_SW_NC_NonRes_Pub_electric	SW New Construction NonRes Public - All Electric	Active	PGE
193	PGE_SW_NC_NonRes_Pub_electric_PA	SW New Construction NonRes Public - All Electric - PGE Costs	Active	PGE
194	PGE_SW_NC_NonRes_Pub_mixed	SW New Construction NonRes Public - Mixed Fuel	Active	PGE
195	PGE_SW_NC_NonRes_Pub_mixed_PA	SW New Construction NonRes Public - Mixed Fuel - PGE Costs	Active	PGE
196	PGE_SW_NC_NonRes_Res_electric	SW New Construction NonRes Res - All Electric	Active	PGE
197	PGE_SW_NC_NonRes_Res_electric_PA	SW New Construction NonRes Res - All Electric - PGE Costs	Active	PGE
198	PGE_SW_NC_NonRes_Res_mixed	SW New Construction NonRes Res - Mixed Fuel	Active	PGE
199	PGE_SW_NC_NonRes_Res_mixed_PA	SW New Construction NonRes Res - Mixed Fuel - PGE Costs	Active	PGE
200	PGE_SW_NC_Res_electric	SW New Construction Res - All Electric	Active	PGE
201	PGE_SW_NC_Res_electric_PA	SW New Construction Res - All Electric - PGE Costs	Active	PGE
202	PGE_SW_PLA	Plug Load and Appliance	Active	PGE
203	PGE_SW_PLA_PA	Plug Load and Appliance - PGE Costs	Active	PGE
204	PGE_SW_UL_PA	Lighting (Upstream) - PGE Costs	Active	PGE
205	PGE_SW_WET_CC	WET Career Connections	Active	PGE
206	PGE_SW_WET_CC_PA	WET Career Connections - PGE Costs	Active	PGE
207	PGE_SW_WET_Work	WET Career and Workforce Readiness	Active	PGE
208	PGE_SW_WET_Work_PA	WET Career and Workforce Readiness - PGE Costs	Active	PGE
209	PGE_SW_WP	Water/wastewater Pumping	New	PGE
210	PGE_SW_WP_PA	Water/wastewater Pumping - PGE Costs	New	PGE
211	PGE_WATER	Water Energy Nexus	Active	PGE
212	RREN01	Residential Resource Acquisition	New	RREN

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
213	RREN02	Commercial Resource Acquisition	New	RREN
214	RREN03	Public Equity	New	RREN
215	RREN04	Residential Equity	New	RREN
216	RREN05	Rural Workforce Education and Training	New	RREN
217	RREN06	Rural Codes and Standards Program	New	RREN
218	RREN07	Rural Finance Equity	New	RREN
219	RREN08_RA_PortfolioSupport	Resource Acquisition Portfolio Support PA Costs	New	RREN
220	RREN09_Equity_PortfolioSupport	Equity Portfolio Support PA Costs	New	RREN
221	RREN10_CS_PortfolioSupport	Codes & Standards Portfolio Support PA Costs	New	RREN
222	RREN11_EMV	Evaluation Measurement & Verification Costs	New	RREN
223	RREN12_IDSMD	RuralREN IDSM Budget	New	RREN
224	SCE-13-ESA	Energy Savings Assistance Program	Active	SCE
225	SCE-13-L-002Y	Grandfathered Street Lights	Active	SCE
226	SCE-13-L-003A	California Community Colleges Energy Efficiency Partnership	Transitioning	SCE
227	SCE-13-L-003G	UC/CSU Energy Efficiency Partnership	Transitioning	SCE
228	SCE-13-RENAAdmin	IOU REN Administrative Costs	Active	SCE
229	SCE-13-SW-001A	Energy Advisor Program	Active	SCE
230	SCE-13-SW-001B	Plug Load and Appliances Program	Transitioning	SCE
231	SCE-13-SW-001F	Residential New Construction Program	Transitioning	SCE
232	SCE-13-SW-001G	Residential Direct Install Program	Active	SCE
233	SCE-13-SW-002A	Commercial Energy Advisor Program	Active	SCE
234	SCE-13-SW-002F	Nonresidential HVAC Program	Transitioning	SCE
235	SCE-13-SW-003D	Strategic Energy Management Program	Active	SCE
236	SCE-13-SW-007A	On-Bill Financing	Active	SCE
237	SCE-13-SW-007A1	On-Bill Financing Loan Pool	Active	SCE
238	SCE-13-SW-007C	New Finance Offerings	Active	SCE
239	SCE-13-SW-007C1	New Finance Offerings Credit Enhancements	New	SCE

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
240	SCE-13-SW-008C	Compliance Improvement	Active	SCE
241	SCE-13-SW-008D	Reach Codes	Active	SCE
242	SCE-13-SW-008E	Planning and Coordination	Active	SCE
243	SCE-13-SW-009A	Technology Development Support	Transitioning	SCE
244	SCE-13-SW-009B	Technology Assessments	Transitioning	SCE
245	SCE-13-SW-009C	Technology Introduction Support	Transitioning	SCE
246	SCE-13-SW-010A	WE&T Integrated Energy Education and Training	Active	SCE
247	SCE-13-SW-MEO	Statewide Marketing, Education & Outreach	Active	SCE
248	SCE-13-TP-001	Comprehensive Manufactured Homes	Active	SCE
249	SCE-13-TP-022	Water Infrastructure Systems Energy Efficiency Program	Transitioning	SCE
250	SCE-13-TP-025	Facility Assessment Service Program	Active	SCE
251	SCE-13-TP-026	Residential 3P Solicitation	Active	SCE
252	SCE-13-TP-027	Commercial 3P Solicitation	Active	SCE
253	SCE-13-TP-028	Industrial 3P Solicitation	Active	SCE
254	SCE-13-TP-029	Local Public Sector 3P Solicitation	New	SCE
255	SCE-13-TP-030	Agricultural 3P Solicitation	New	SCE
256	SCE-3OV0100	SCE EM&V	Active	SCE
257	SCE-3OV0200	CPUC EM&V	Active	SCE
258	SCE_3P_2020RCI_001	Marketplace	New	SCE
259	SCE_3P_2020RCI_003	Commercial Behavioral Program	Active	SCE
260	SCE_3P_2020RCI_005	Comprehensive Commercial Program	Active	SCE
261	SCE_3P_2021AGPUB_001	Agriculture Energy Efficiency Program	New	SCE
262	SCE_3P_2021AGPUB_002	Public Energy Performance Program	New	SCE
263	SCE_3P_SEM_001	Commercial Energy Manager Program	New	SCE
264	SCE_3P_SEM_002	Industrial and Agriculture Energy Manager Program (Ind)	New	SCE
265	SCE_CS_PortfolioSupport	Codes & Standards Portfolio Support Costs	New	SCE
266	SCE_Equity_PortfolioSupport	Equity Portfolio Support Costs	New	SCE

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
267	SCE_MarketSupport_001	EE New Program Design Pilots	New	SCE
268	SCE_MarketSupport_002	EE Contractor Demand Building Program	New	SCE
269	SCE_MS_PortfolioSupport	Market Support Portfolio Support Costs	New	SCE
270	SCE_PB_CS	Codes and Standards P&B	New	SCE
271	SCE_PB_EMV	EM&V P&B	New	SCE
272	SCE_PB_Equity	Equity P&B	New	SCE
273	SCE_PB_MS	Market Support P&B	New	SCE
274	SCE_PB_RA	Resource Acquisition P&B	New	SCE
275	SCE_Portfolio_Oversight	ED Portfolio Oversight	New	SCE
276	SCE_RA_PortfolioSupport	Resource Acquisition Portfolio Support Costs	New	SCE
277	SCE_Res_Equity_001	Residential Energy Advisor (Resource)	New	SCE
278	SCE_Res_Equity_002	Residential Energy Advisor (Non-Resource)	New	SCE
279	SCE_Res_Equity_003	Disadvantaged Communities Marketing and Outreach	New	SCE
280	SCE_SMB_Equity_001	Simplified Savings	New	SCE
281	SCE_SW_CSA_Appl	Codes & Standards Advocacy - State Appliance Standards Advocacy	Active	SCE
282	SCE_SW_CSA_Appl_PA	Codes & Standards Advocacy - State Appliance Standards Advocacy - SCE Costs	Active	SCE
283	SCE_SW_CSA_Bldg	Codes & Standards Advocacy - State Building Codes Advocacy	Active	SCE
284	SCE_SW_CSA_Bldg_PA	Codes & Standards Advocacy - State Building Codes Advocacy - SCE Costs	Active	SCE
285	SCE_SW_CSA_Natl	Codes & Standards Advocacy - National Codes & Standards Advocacy	Active	SCE
286	SCE_SW_CSA_Natl_PA	Codes & Standards Advocacy - National Codes & Standards Advocacy - SCE Costs	Active	SCE
287	SCE_SW_ETP_Elec	Emerging Technologies Program, Electric	New	SCE
288	SCE_SW_ETP_Elec_PA	Emerging Technologies Program, Electric - SCE Costs	New	SCE
289	SCE_SW_FS	Food Service POS	Active	SCE
290	SCE_SW_FS_PA	Food Service POS - SCE Costs	Active	SCE
291	SCE_SW_HVAC_QIQM	SW HVAC QI/QM Program	New	SCE

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
292	SCE_SW_HVAC_QIQM_PA	SW HVAC QI/QM Program - SCE Costs	Active	SCE
293	SCE_SW_HVAC_Up_Com	SW HVAC Upstream Commercial	New	SCE
294	SCE_SW_HVAC_Up_Com_PA	SW HVAC Upstream Commercial - SCE Costs	New	SCE
295	SCE_SW_HVAC_Up_Res	SW HVAC Upstream Residential	New	SCE
296	SCE_SW_HVAC_Up_Res_PA	SW HVAC Upstream Residential - SCE Costs	New	SCE
297	SCE_SW_IP_Colleges	Institutional Partnerships, UC/CSU/CCC	New	SCE
298	SCE_SW_IP_Colleges_PA	Institutional Partnerships, UC/CSU/CCC - SCE Costs	New	SCE
299	SCE_SW_IP_Gov	Institutional Partnerships: DGS & DoC	Active	SCE
300	SCE_SW_IP_Gov_PA	Institutional Partnerships: DGS & DoC - SCE Costs	Active	SCE
301	SCE_SW_MCWH	Midstream Comm Water Heating	Active	SCE
302	SCE_SW_MCWH_PA	Midstream Comm Water Heating - SCE Costs	Active	SCE
303	SCE_SW_NC_NonRes_Ag_electric	SW New Construction NonRes Ag - All Electric	Active	SCE
304	SCE_SW_NC_NonRes_Ag_electric_PA	SW New Construction NonRes Ag - All Electric - SCE Costs	Active	SCE
305	SCE_SW_NC_NonRes_Ag_mixed	SW New Construction NonRes Ag - Mixed Fuel	Active	SCE
306	SCE_SW_NC_NonRes_Ag_mixed_PA	SW New Construction NonRes Ag - Mixed Fuel - SCE Costs	Active	SCE
307	SCE_SW_NC_NonRes_Com_electric	SW New Construction NonRes Com - All Electric	Active	SCE
308	SCE_SW_NC_NonRes_Com_electric_PA	SW New Construction NonRes Com - All Electric - SCE Costs	Active	SCE
309	SCE_SW_NC_NonRes_Com_mixed	SW New Construction NonRes Com - Mixed Fuel	Active	SCE
310	SCE_SW_NC_NonRes_Com_mixed_PA	SW New Construction NonRes Com - Mixed Fuel - SCE Costs	Active	SCE
311	SCE_SW_NC_NonRes_Ind_electric	SW New Construction NonRes Ind - All Electric	Active	SCE
312	SCE_SW_NC_NonRes_Ind_electric_PA	SW New Construction NonRes Ind - All Electric - SCE Costs	Active	SCE
313	SCE_SW_NC_NonRes_Ind_mixed	SW New Construction NonRes Ind - Mixed Fuel	Active	SCE
314	SCE_SW_NC_NonRes_Ind_mixed_PA	SW New Construction NonRes Ind - Mixed Fuel - SCE Costs	Active	SCE
315	SCE_SW_NC_NonRes_Pub_electric	SW New Construction NonRes Public - All Electric	Active	SCE
316	SCE_SW_NC_NonRes_Pub_electric_PA	SW New Construction NonRes Public - All Electric - SCE Costs	Active	SCE
317	SCE_SW_NC_NonRes_Pub_mixed	SW New Construction NonRes Public - Mixed Fuel	Active	SCE
318	SCE_SW_NC_NonRes_Pub_mixed_PA	SW New Construction NonRes Public - Mixed Fuel - SCE Costs	Active	SCE

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
319	SCE_SW_NC_NonRes_Res_electric	SW New Construction NonRes Res - All Electric	Active	SCE
320	SCE_SW_NC_NonRes_Res_electric_PA	SW New Construction NonRes Res - All Electric - SCE Costs	Active	SCE
321	SCE_SW_NC_NonRes_Res_mixed	SW New Construction NonRes Res - Mixed Fuel	Active	SCE
322	SCE_SW_NC_NonRes_Res_mixed_PA	SW New Construction NonRes Res - Mixed Fuel - SCE Costs	Active	SCE
323	SCE_SW_NC_Res_electric	SW New Construction Res - All Electric	Active	SCE
324	SCE_SW_NC_Res_electric_PA	SW New Construction Res - All Electric - SCE Costs	Active	SCE
325	SCE_SW_NC_Res_mixed_PA	SW New Construction Res - Mixed Fuel - SCE Costs	Active	SCE
326	SCE_SW_PLA	Plug Load and Appliance	Active	SCE
327	SCE_SW_PLA_PA	Plug Load and Appliance - SCE Costs	New	SCE
328	SCE_SW_UL_PA	Lighting (Upstream) - SCE Costs	Active	SCE
329	SCE_SW_WET_CC	WET Career Connections	Active	SCE
330	SCE_SW_WET_CC_PA	WET Career Connections - SCE Costs	Active	SCE
331	SCE_SW_WET_Work	WE&T Career and Workforce Readiness	Active	SCE
332	SCE_SW_WET_Work_PA	WE&T Career and Workforce Readiness - SCE Costs	Active	SCE
333	SCE_SW_WP	Water/wastewater Pumping	Active	SCE
334	SCE_SW_WP_PA	Water/wastewater Pumping - SCE Costs	New	SCE
335	SCG3701	RES-Residential Energy Advisor	Active	SCG
336	SCG3702	RES-Residential Energy Efficiency Program	Active	SCG
337	SCG3705	RES-Multifamily Whole Building Program (Equity)	Active	SCG
338	SCG3708	COM-Energy Advisor	Active	SCG
339	SCG3711	COM-Deemed Incentives	Active	SCG
340	SCG3714	IND-Strategic Energy Management	Active	SCG
341	SCG3721	ET-Technology Development Support	Active	SCG
342	SCG3722	ET-Technology Assessment Support	Active	SCG
343	SCG3723	ET-Technology Introduction Support	Active	SCG
344	SCG3729	WET&O-Integrated Energy Efficiency Training	Active	SCG
345	SCG3733	SW-ME&O-ME&O	Active	SCG

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
346	SCG3735	FIN-On-Bill Financing	Active	SCG
347	SCG3737	FIN-SW-New Financing Offerings	Active	SCG
348	SCG3757	IND-Small Industrial Facility Upgrades	Active	SCG
349	SCG3760	WET&O-HERS Rater Training Advancement	Active	SCG
350	SCG3764	WET&O-Educational Outreach Program	Active	SCG
351	SCG3771	SOL-IDEEA365 Solicitations	Active	SCG
352	SCG3772	EM&V-Evaluation Measurement & Verification	Active	SCG
353	SCG3803	FIN-SW-California Hub for EE Financing	Active	SCG
354	SCG3823	RES-HVAC QI/QM	Transitioning	SCG
355	SCG3824	RES-Residential Behavioral Program	Active	SCG
356	SCG3829	RES-Marketplace	Active	SCG
357	SCG3830	Retail Channel Support	Active	SCG
358	SCG3831	RES-EE Kit Delivery Program	Active	SCG
359	SCG3832	RES-Pasadena Water & Power Home Upgrade Program	Active	SCG
360	SCG3833	RES-Burbank Water & Power Home Upgrade Program	Active	SCG
361	SCG3834	COM-LADWP Direct Install	Active	SCG
362	SCG3837	PUB-SW-Energy Atlas	Active	SCG
363	SCG3861	RES-Community Language Efficiency Outreach Program	Active	SCG
364	SCG3882	COM-Small and Medium Commercial EE Program (Resource Acquisition)	Active	SCG
365	SCG3883	RES-Residential Advanced Clean Energy Program (Resource Acquisition)	Active	SCG
366	SCG3884	RES-Comprehensive Mobile Home Program	Active	SCG
367	SCG3885	RES-Residential Mobile Home Program	Active	SCG
368	SCG3886	PUB-Public Direct Install Program	Active	SCG
369	SCG3887	COM-Commercial-BEST (Resource Acquisition)	Active	SCG
370	SCG3888	RES-Multifamily Space and Water Heating Controls	Active	SCG
371	SCG3889	RES-Multifamily Energy Alliance Program (Resource Acquisition)	Active	SCG

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
372	SCG3890	AG-Agriculture Energy Efficiency Program	Active	SCG
373	SCG3891	COM-Service RCx Large Commercial Program	Active	SCG
374	SCG3892	COM-Large Commercial Energy Efficiency Program	Active	SCG
375	SCG3898	COM-Nonresidential Behavioral Program	New	SCG
376	SCG3899	PUB-Large Public EE Solicitation	New	SCG
377	SCG3901	WET&O-Energy Program Outreach	New	SCG
378	SCG3909	CC-Nonresidential Energy Advisor Program	Active	SCG
379	SCG3910	CC-Nonresidential Calculated Incentives	Active	SCG
380	SCG3911	CC-Nonresidential Deemed Incentives	Active	SCG
381	SCG3912	PUB-Regional Energy Pathways	Active	SCG
382	SCG3913	PUB-REN Fiscal Management & Coordination	Active	SCG
383	SCG3935	RES-Residential Advanced Clean Energy Program (Equity)	New	SCG
384	SCG3936	RES-Multifamily Energy Alliance Program (Equity)	New	SCG
385	SCG3937	COM-Small and Medium Commercial EE Program (Equity)	New	SCG
386	SCG3938	RES-Multifamily Whole Building Program (Resource Acquisition)	New	SCG
387	SCG3939	COM-Strategic Energy Management	New	SCG
388	SCG3940	COM-Commercial-BEST (Equity)	New	SCG
389	SCG3941	CC-Sustainability Studio	New	SCG
390	SCG3942	IND-Industrial Savings, Training, Assistance, and Rebates (Industrial STAR) Program	Active	SCG
391	SCG3943	IND-Industrial Energy Partners (IEP) Program	New	SCG
392	SCG3944	IND-Refinery Gas Energy Efficiency (RGEEP) Program	New	SCG
393	SCG3945	IND-Innovations to Industrials (i2i) SEM	New	SCG
394	SCG3948	Summer Reliability Program	New	SCG
395	SCG3956	K-12 Public Schools Program (K12PSP)	New	SCG
396	SCG3957	COM-IDEEA365	New	SCG
397	SCG3958	Res Energy Efficiency Program Equity	New	SCG

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
398	SCG3960	Res-IDEEA365	New	SCG
399	SCG3961	COM-Pool Heating Energy Efficiency Program	New	SCG
400	SCG3962	IDSM	New	SCG
401	SCG_CS_PortfolioSupport	Codes & Standards Portfolio Support PA Costs	Active	SCG
402	SCG_Equity_PortfolioSupport	Equity Portfolio Support PA Costs	Active	SCG
403	SCG-ESAP	Energy Savings Assistance Program	Active	SCG
404	SCG-GRCL	GRC Labor Loaders	Active	SCG
405	SCG_MS_PortfolioSupport	Market Support Portfolio Support PA Costs	Active	SCG
406	SCG_Portfolio_Oversight	ED Portfolio Oversight	Active	SCG
407	SCG_RA_PortfolioSupport	Resource Acquisition Portfolio Support PA Costs	Active	SCG
408	SCG_SW_CSA_Appl	C&S-SW-Appliance Standards Advocacy	Active	SCG
409	SCG_SW_CSA_Appl_PA	C&S-SW-Appliance Standards Advocacy-PA	Active	SCG
410	SCG_SW_CSA_Bldg	C&S-SW-Building Codes Advocacy	Active	SCG
411	SCG_SW_CSA_Bldg_PA	C&S-SW-Building Codes Advocacy-PA	Active	SCG
412	SCG_SW_CSA_Natl	C&S-SW-Federal Codes Advocacy	Active	SCG
413	SCG_SW_CSA_Natl_PA	C&S-SW-Federal Codes Advocacy-PA	Active	SCG
414	SCG_SW_ETP_Gas	ET-SW-Emerging Technologies, Gas	Active	SCG
415	SCG_SW_ETP_Gas_PA	ET-SW-Emerging Technologies, Gas-PA	Active	SCG
416	SCG_SW_FS	COM-SW-Point of Sale Food Service	Active	SCG
417	SCG_SW_FS_PA	COM-SW-Point of Sale Food Service-PA	Active	SCG
418	SCG_SW_HVAC_QIQM	RES-SW-HVAC QI/QM Program	New	SCG
419	SCG_SW_HVAC_QIQM_PA	RES-SW-HVAC QI/QM Program-PA	New	SCG
420	SCG_SW_HVAC_Up_Com	COM-SW-HVAC Upstream Commercial	New	SCG
421	SCG_SW_HVAC_Up_Com_PA	COM-SW-HVAC Upstream Commercial-PA	New	SCG
422	SCG_SW_HVAC_Up_Res	RES-SW-HVAC Upstream Residential	New	SCG
423	SCG_SW_HVAC_Up_Res_PA	RES-SW-HVAC Upstream Residential-PA	New	SCG
424	SCG_SW_IP_Colleges	PUB-SW-Institutional Partnership-Colleges	New	SCG

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
425	SCG_SW_IP_Colleges_PA	PUB-SW-Institutional Partnership-Colleges-PA	New	SCG
426	SCG_SW_IP_Gov	PUB-SW-Institutional Partnership-Government	Active	SCG
427	SCG_SW_IP_Gov_PA	PUB-SW-Institutional Partnership-Government-PA	Active	SCG
428	SCG_SW_MCWH	COM-SW-Midstream Commercial Water Heating	Active	SCG
429	SCG_SW_MCWH_PA	COM-SW-Midstream Commercial Water Heating-PA	Active	SCG
430	SCG_SW_NC_NonRes_Ag_mixed	AG-SW-New Construction-Nonresidential-Mixed Fuel	Active	SCG
431	SCG_SW_NC_NonRes_Ag_mixed_PA	AG-SW-New Construction-Nonresidential-Mixed Fuel-PA	Active	SCG
432	SCG_SW_NC_NonRes_Com_mixed	COM-SW-New Construction-Nonresidential-Mixed Fuel	Active	SCG
433	SCG_SW_NC_NonRes_Com_mixed_PA	COM-SW-New Construction-Nonresidential-Mixed Fuel-PA	Active	SCG
434	SCG_SW_NC_NonRes_Ind_mixed	IND-SW-New Construction-Nonresidential-Mixed Fuel	Active	SCG
435	SCG_SW_NC_NonRes_Ind_mixed_PA	IND-SW-New Construction-Nonresidential-Mixed Fuel-PA	Active	SCG
436	SCG_SW_NC_NonRes_Pub_mixed	PUB-SW-New Construction-Nonresidential-Mixed Fuel	Active	SCG
437	SCG_SW_NC_NonRes_Pub_mixed_PA	PUB-SW-New Construction-Nonresidential-Mixed Fuel-PA	Active	SCG
438	SCG_SW_NC_NonRes_Res_mixed	RES-SW-New Construction-Nonresidential-Mixed Fuel	Active	SCG
439	SCG_SW_NC_NonRes_Res_mixed_PA	RES-SW-New Construction-Nonresidential-Mixed Fuel-PA	Active	SCG
440	SCG_SW_PLA	RES-SW-Plug Load and Appliances	New	SCG
441	SCG_SW_PLA_PA	RES-SW-Plug Load and Appliances-PA	New	SCG
442	SCG_SW_WET_CC	WET&O-SW-WE&T Career Connections	Active	SCG
443	SCG_SW_WET_CC_PA	WET&O-SW-WE&T Career Connections-PA	Active	SCG
444	SCG_SW_WET_Work	WET&O-SW-WE&T Career and Workforce Readiness	Active	SCG
445	SCG_SW_WET_Work_PA	WET&O-SW-WE&T Career and Workforce Readiness-PA	Active	SCG
446	SCG_SW_WP	PUB-SW-Water/Wastewater Pumping	New	SCG
447	SCG_SW_WP_PA	PUB-SW-Water/Wastewater Pumping-PA	New	SCG
448	SCP01	SCP FLEXmarket	New	SCP
449	SCR-AGR-G1	Agriculture Project Delivery Program	New	SCR
450	SCR-AGR-G2	Rural-HTR Agricultural DI	New	SCR
451	SCR-AGR-G3	Agriculture Retrofit	New	SCR

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
452	SCR-CBDC-01	SoCalREN Community Based Design Collaborative	New	SCR
453	SCR-COM-E2	California Green Business Network	New	SCR
454	SCR-COM-E3	Food Desert Energy Efficiency Equity Program	New	SCR
455	SCR-COM-E4	Small & Medium Business Energy Advisory (SMBEA)	New	SCR
456	SCR-COM-E5	Small Commercial Direct Install Program	New	SCR
457	SCR_CS_PortfolioSupport	Codes & Standards Portfolio Support PA Costs	New	SCR
458	SCR-CST-F1	Codes and Standards Compliance Enhancement Program	New	SCR
459	SCR-EMV-01	SoCalREN EM&V	Active	SCR
460	SCR_EQ_PortfolioSupport	Equity Portfolio Support PA Costs	New	SCR
461	SCR-FIN-C1	Public Agency Revolving Loan Fund	Active	SCR
462	SCR-FIN-C3	Rural-HTR Agriculture Finance Assistance Program	New	SCR
463	SCR_MS_PortfolioSupport	Market Support Portfolio Support PA Costs	New	SCR
464	SCR-PUBL-B1	Energy Efficiency Project Delivery Program	Active	SCR
465	SCR-PUBL-B10	Water Infrastructure Program	New	SCR
466	SCR-PUBL-B2	Distributed Energy Resource Disadvantaged Communities Program	Active	SCR
467	SCR-PUBL-B3	Public Agency NMEC Program	Active	SCR
468	SCR-PUBL-B4	Streamlined Savings Program	Active	SCR
469	SCR-PUBL-B5	Rural-HTR Public Agency Direct Install	New	SCR
470	SCR-PUBL-B6	Energy Resiliency Action Plan	New	SCR
471	SCR-PUBL-B7	Regional Partner Initiatives	New	SCR
472	SCR-PUBL-B8	Water & Wastewater Strategic Energy Management	New	SCR
473	SCR-PUBL-B9	Underserved Schools Strategic Energy Management	New	SCR
474	SCR_RA_PortfolioSupport	Resource Acquisition Portfolio Support PA Costs	New	SCR
475	SCR-RES-A1	Multifamily Program	Active	SCR
476	SCR-RES-A4	Residential Kits4Kids	Active	SCR
477	SCR-RES-A5	Small HTR Multifamily Direct Install	New	SCR
478	SCR-WET-D1	Workforce Education & Training Program	Active	SCR

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
479	SCR-WET-D2	ACES Pathway	New	SCR
480	SCR-WET-D3	Green Path Careers	New	SCR
481	SCR-WET-D4	WE&T Opportunity HUB	New	SCR
482	SCR-WET-D5	Agriculture WE&T	New	SCR
483	SCR-WET-D6	E-Contractor Academy	New	SCR
484	SDGE3226	SW-COM Direct Install	Active	SDGE
485	SDGE3251	SW C&S - Compliance Enhancement	Active	SDGE
486	SDGE3252	SW C&S - Reach Codes	Active	SDGE
487	SDGE3253	SW C&S - Planning Coordination	Active	SDGE
488	SDGE3262	SW-FIN-On-Bill Finance	Active	SDGE
489	SDGE3264	SW-FIN-New Finance Offerings	Active	SDGE
490	SDGE3280	3P-IDEEA	Active	SDGE
491	SDGE3281	EM&V-Evaluation Measurement & Verification	Active	SDGE
492	SDGE3308	Finance Pilot ME&O OBR	Active	SDGE
493	SDGE3312	Finance IT OBR	Active	SDGE
494	SDGE3325	SW-FIN-Finance Pilots Credit Enhancement	Active	SDGE
495	SDGE4001	Single Family Program	Active	SDGE
496	SDGE4002	Multi Family Program	Active	SDGE
497	SDGE4004	Commercial Large Customer Services (>20KW) Program	Active	SDGE
498	SDGE4006	Industrial Sector Program	Active	SDGE
499	SDGE4009	Agricultural Growers Services Program	Active	SDGE
500	SDGE4010	Local Government Customers Program	Active	SDGE
501	SDGE4011	K-12 Customer Services Program	Active	SDGE
502	SDGE4012	Federal Customer Services Program	Active	SDGE
503	SDGE4040	IDSMS Local Residential Behavioral Program (EE)	Active	SDGE
504	SDGE4052	IDSMS Commercial ME&O - DR	Active	SDGE
505	SDGE4056	IDSMS Commercial - DR	Active	SDGE

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
506	SDGE4057	IDSM Behavioral - DR	Active	SDGE
507	SDGE4058	IDSM Non Res Audits - DR	Active	SDGE
508	SDGE4168	Lodging (Hotels/Motels)	New	SDGE
509	SDGE4169	Groceries, Restaurants and Food Storage	New	SDGE
510	SDGE4170	Wholesale/Retail/Office, including Entertainment Services	New	SDGE
511	SDGE4171	Private Institutions/Healthcare	New	SDGE
512	SDGE4173	Small Business Outreach	Active	SDGE
513	SDGE4174	Workforce, Education & Training Programs	Active	SDGE
514	SDGE4175	Local Residential Fuel-Substitution	New	SDGE
515	SDGE4176	Residential Equity Program	New	SDGE
516	SDGE4184	Non-Residential Behavioral Program	New	SDGE
517	SDGE4197	Market Access Program - Residential	New	SDGE
518	SDGE4198	Market Access Program - Commercial	New	SDGE
519	SDGE_CS_PortfolioSupport	Codes & Standards Portfolio Support PA Costs	Active	SDGE
520	SDGE_Equity_PortfolioSupport	Equity Portfolio Support PA Costs	Active	SDGE
521	SDGE-ESAP	Energy Savings Assistance Program (ESA)	Active	SDGE
522	SDGE-ESPI	ESPI	Active	SDGE
523	SDGE-GRCL	GRC Labor Loaders	Active	SDGE
524	SDGE_MS_PortfolioSupport	Market Support Portfolio Support PA Costs	Active	SDGE
525	SDGE_Portfolio_Oversight	ED Portfolio Oversight	Active	SDGE
526	SDGE_RA_PortfolioSupport	Resource Acquisition Portfolio Support PA Costs	Active	SDGE
527	SDGE_SW_CSA_Appl	SW Codes & Standards Advocacy - State Appliance Standards	Active	SDGE
528	SDGE_SW_CSA_Appl_PA	SW Codes & Standards Advocacy - State Appliance Standards (Utility)	Active	SDGE
529	SDGE_SW_CSA_Bldg	SW Codes & Standards Advocacy - State Building Codes	Active	SDGE
530	SDGE_SW_CSA_Bldg_PA	SW Codes & Standards Advocacy - State Building Codes (Utility)	Active	SDGE
531	SDGE_SW_CSA_Natl	SW Codes & Standards Advocacy - National Codes & Standards Advocacy	Active	SDGE

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
532	SDGE_SW_CSA_Natl_PA	SW Codes & Standards Advocacy - National Codes & Standards Advocacy (Utility)	Active	SDGE
533	SDGE_SW_ETP_Elec	SW Emerging Technologies - Electric	New	SDGE
534	SDGE_SW_ETP_Elec_PA	SW Emerging Technologies - Electric (Utility)	New	SDGE
535	SDGE_SW_ETP_Gas	SW Emerging Technologies - Gas	Active	SDGE
536	SDGE_SW_ETP_Gas_PA	SW Emerging Technologies - Gas (Utility)	Active	SDGE
537	SDGE_SW_FS	SW Foodservice Point of Sale Program	Active	SDGE
538	SDGE_SW_FS_PA	SW Foodservice Point of Sale Program (Utility)	Active	SDGE
539	SDGE_SW_HESC_PA	SW Home Energy Score California (Utility)	New	SDGE
540	SDGE_SW_HVAC_QIQM	SW HVAC QI/QM Program	Active	SDGE
541	SDGE_SW_HVAC_QIQM_PA	SW HVAC QI/QM Program (Utility)	Active	SDGE
542	SDGE_SW_HVAC_Up_Com	SW HVAC Upstream Commercial	Active	SDGE
543	SDGE_SW_HVAC_Up_Com_PA	SW HVAC Upstream Commercial (Utility)	Active	SDGE
544	SDGE_SW_HVAC_Up_PA	SW HVAC Upstream Program (Utility)	Active	SDGE
545	SDGE_SW_HVAC_Up_Res	SW HVAC Upstream Residential	Active	SDGE
546	SDGE_SW_HVAC_Up_Res_PA	SW HVAC Upstream Residential (Utility)	Active	SDGE
547	SDGE_SW_IP_Colleges	SW Higher Education	New	SDGE
548	SDGE_SW_IP_Colleges_PA	SW Higher Education (Utility)	New	SDGE
549	SDGE_SW_IP_Gov	SW Institutional Partnerships: DGS & DoC	Active	SDGE
550	SDGE_SW_IP_Gov_PA	SW Institutional Partnerships: DGS & DoC (Utility)	Active	SDGE
551	SDGE_SW_MCWH	SW Midstream Commercial Water Heating	Active	SDGE
552	SDGE_SW_MCWH_PA	SW Midstream Commercial Water Heating (Utility)	Active	SDGE
553	SDGE_SW_NC_NonRes_Ag_electric	SW New Construction Non Residential - Agricultural - All Electric	Active	SDGE
554	SDGE_SW_NC_NonRes_Ag_electric_PA	SW New Construction Non Residential - Agricultural - All Electric (Utility)	Active	SDGE
555	SDGE_SW_NC_NonRes_Ag_mixed	SW New Construction Non Residential - Agricultural - Mixed Fuel	Active	SDGE
556	SDGE_SW_NC_NonRes_Ag_mixed_PA	SW New Construction Non Residential - Agricultural - Mixed Fuel (Utility)	Active	SDGE

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
557	SDGE_SW_NC_NonRes_Com_electric	SW New Construction Non Residential - Commercial - All Electric	Active	SDGE
558	SDGE_SW_NC_NonRes_Com_electric_PA	SW New Construction Non Residential - Commercial - All Electric (Utility)	Active	SDGE
559	SDGE_SW_NC_NonRes_Com_mixed	SW New Construction Non Residential - Commercial - Mixed Fuel	Active	SDGE
560	SDGE_SW_NC_NonRes_Com_mixed_PA	SW New Construction Non Residential - Commercial - Mixed Fuel (Utility)	Active	SDGE
561	SDGE_SW_NC_NonRes_Ind_electric	SW New Construction Non Residential - Industrial - All Electric	Active	SDGE
562	SDGE_SW_NC_NonRes_Ind_electric_PA	SW New Construction Non Residential - Industrial - All Electric (Utility)	Active	SDGE
563	SDGE_SW_NC_NonRes_Ind_mixed	SW New Construction Non Residential - Industrial - Mixed Fuel	Active	SDGE
564	SDGE_SW_NC_NonRes_Ind_mixed_PA	SW New Construction Non Residential - Industrial - Mixed Fuel (Utility)	Active	SDGE
565	SDGE_SW_NC_NonRes_Pub_electric	SW New Construction Non Residential - Public - All Electric	Active	SDGE
566	SDGE_SW_NC_NonRes_Pub_electric_PA	SW New Construction Non Residential - Public - All Electric (Utility)	Active	SDGE
567	SDGE_SW_NC_NonRes_Pub_mixed	SW New Construction Non Residential - Public - Mixed Fuel	Active	SDGE
568	SDGE_SW_NC_NonRes_Pub_mixed_PA	SW New Construction Non Residential - Public - Mixed Fuel (Utility)	Active	SDGE
569	SDGE_SW_NC_NonRes_Res_electric	SW New Construction NonResidential - Residential - All Electric	Active	SDGE
570	SDGE_SW_NC_NonRes_Res_electric_PA	SW New Construction NonResidential - Residential - All Electric (Utility)	Active	SDGE
571	SDGE_SW_NC_NonRes_Res_mixed	SW New Construction NonResidential - Residential - Mixed Fuel	Active	SDGE
572	SDGE_SW_NC_NonRes_Res_mixed_PA	SW New Construction NonResidential - Residential - Mixed Fuel (Utility)	Active	SDGE
573	SDGE_SW_NC_Res_electric	SW New Construction Residential - All Electric	Active	SDGE
574	SDGE_SW_NC_Res_electric_PA	SW New Construction Residential - All Electric (Utility)	Active	SDGE
575	SDGE_SW_PLA	SW Plug Load and Appliances	New	SDGE
576	SDGE_SW_PLA_PA	SW Plug Load and Appliances (Utility)	New	SDGE
577	SDGE_SW_UL_PA	SW Lighting Program (Utility)	Active	SDGE
578	SDGE_SW_WET_CC	SW WET Career Connections	Active	SDGE
579	SDGE_SW_WET_CC_PA	SW WET Career Connections (Utility)	Active	SDGE
580	SDGE_SW_WET_Work	SW WE&T Career & Workforce Readiness (CWR)	Active	SDGE

D.23-06-055 Ordering Paragraph 32 Report
October 1, 2024

Index	Program	Program Name	Status	PA
581	SDGE_SW_WET_Work_PA	SW WE&T Career & Workforce Readiness (CWR) (Utility)	Active	SDGE
582	SDGE_SW_WP	SW Downstream Water/Wastewater Pumping Program	Active	SDGE
583	SDGE_SW_WP_PA	SW Downstream Water/Wastewater Pumping Program (Utility)	Active	SDGE
584	SJCE01	Non-Residential	New	SJCE
585	SJCE02	Residential	New	SJCE
586	TCR-Ag-001	Agriculture Technical Assistance	New	TCR
587	TCR-CC-001	Energy Assurance Services (EAS)	New	TCR
588	TCR-Com-001	Commercial Marketplace	New	TCR
589	TCR-CS-001	Codes & Standards	Active	TCR
590	TCR-CS-PortfolioSupport	Portfolio Admin - CS	New	TCR
591	TCR-EMV-001	TCR EM&V	Active	TCR
592	TCR-Equity-PortfolioSupport	Portfolio Admin - Equity	New	TCR
593	TCR-IDSM-CS-003	IDSM - Codes & Standards	New	TCR
594	TCR-IDSM-Equity-001	IDSM - Equity	New	TCR
595	TCR-IDSM-MarketSupport-002	IDSM - Market Support	New	TCR
596	TCR-MS-PortfolioSupport	Portfolio Admin - Market Support	New	TCR
597	TCR-Res-002	Multifamily	New	TCR
598	TCR-Res-003	Single Family NMEC	New	TCR
599	TCR-WET-001	Workforce Education & Training	Active	TCR

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

Application of Pacific Gas and Electric Company
for Compliance Review of Utility Owned
Generation Operations, Portfolio Allocation
Balancing Account Entries, Energy Resource
Recovery Account Entries, Contract Administration,
Economic Dispatch of Electric Resources, Utility
Owned Generation Fuel Procurement, and Other
Activities for the Record Period January 1 through
December 31, 2022

Application 23-02-018

U 39 E

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
OPENING BRIEF**

PUBLIC VERSION

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SUBJECT MATTER INDEX

I.	BACKGROUND	4
A.	PG&E's Efforts to Sell Excess RA Directly Impact PCIA Rates.....	4
B.	PG&E Counted Nearly a Gigawatt of Excess RA Capacity Towards its Incremental Procurement Targets During the Summer of 2022	7
II.	BURDEN OF PROOF AND LEGAL STANDARD	9
III.	ARGUMENT	10
A.	PG&E [REDACTED] yet counted nearly a gigawatt of excess RA towards its procurement targets.	10
B.	The Commission Should Scrutinize the Adjustments PG&E Makes to its RA Position to Ensure Any Reductions to the Capacity PG&E Makes Available to the Market are Justified	14
C.	PG&E Did Not Make Reasonable Attempts To Sell Its Excess RA During The Summer of 2022 After It Was Known to be Available.	18
D.	The Commission Should Not Find PG&E Prudently Managed its RA Portfolio and Should Not Find PG&E's PABA Entries are Reasonable	19
E.	The Commission Should Revisit PG&E's BPP in the IRP Docket	21
IV.	CONCLUSION.....	23

TABLE OF AUTHORITIES

Statutes

Cal. Pub. Util. Code § 451	9
----------------------------------	---

Commission Decisions

D.02-10-062	20
D.02-12-069	20
D.02-12-074	20
D.05-04-036	20
D.09-03-025	10
D.12-11-051	10
D.16-04-006	10
D.18-10-019	5
D.19-10-001	6, 7
D.20-12-036	20
D.21-03-056	3, 9
D.21-12-015	3, 8, 9
D.22-02-002	6
D.22-12-044	6
D.23-12-008	22
D.90-09-088	21

Commission Rules of Practice and Procedure

Rule 13.12	1
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SUMMARY OF RECOMMENDATIONS

- The California Public Utilities Commission (Commission) should scrutinize Pacific Gas & Electric Company's (PG&E) assumptions about resource availability and the adjustments PG&E made to its System Resource Adequacy (RA) position in future ERRR Compliance proceedings to ensure any reductions to the excess RA capacity PG&E made available to the market are justified.
- The Commission should find PG&E did not make reasonable attempts to sell its excess RA capacity to other load-serving entities (LSE) before counting that capacity towards its own system reliability incremental procurement targets.
- The Commission should not find that PG&E prudently managed its utility-owned generation (UOG) facilities.
- The Commission should not find PG&E's entries recorded to the Portfolio Allocation Balancing Account (PABA) are reasonable.
- The Commission should revisit PG&E's Bundled Procurement Plan (BPP) in the Integrated Resource Plan (IRP) proceeding to ensure that PG&E is making its excess RA available to the market in a timely and comprehensive manner, including through scheduled solicitations and market offers outside the scheduled solicitation process.

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

Application of Pacific Gas and Electric Company for
Compliance Review of Utility Owned Generation
Operations, Portfolio Allocation Balancing Account
Entries, Energy Resource Recovery Account Entries,
Contract Administration, Economic Dispatch of
Electric Resources, Utility Owned Generation Fuel
Procurement, and Other Activities for the Record
Period January 1 through December 31, 2022

Application 23-02-018

U 39 E

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
OPENING BRIEF**

The California Community Choice Association¹ (CalCCA) submits this Opening Brief regarding the *Application of Pacific Gas and Electric Company (U 39 E) for Compliance Review of Utility Owned Generation Operations, Portfolio Allocation Balancing Account Entries, Energy Resource Recovery Account Entries, Contract Administration, Economic Dispatch of Electric Resources, Utility Owned Generation Fuel Procurement, and Other Activities for the Record Period January 1 Through December 31, 2022* (Application) pursuant to Rule 13.12 of the Rules of Practice and Procedure of the California Public Utilities Commission and the Administrative Law Judge's (ALJ) September 3, 2024 Ruling Setting the Proceeding Schedule.²

ERRA Compliance proceedings involve a backward-looking review of the investor-owned

¹ California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance of Southern California, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

² Administrative Law Judge's Ruling Setting the Proceeding Schedule (Sept. 3, 2024), available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M539/K203/539203270.PDF>.

utility's (IOU) activities and accounting entries. In particular, these proceedings require the Commission to scrutinize the IOU's activities and entries during the record year and determine whether the IOU met its burden and complied with applicable Commission decisions. The instant proceeding involves an examination of PG&E's 2022 activities and entries. Those activities include PG&E's System Resource Adequacy (RA) sales, its attempts to sell RA, and its failure to timely sell excess RA to other LSEs during the summer of 2022—resulting in PG&E counting nearly a gigawatt of excess RA towards its own incremental system reliability procurement targets during the summer of 2022. The Commission has not examined, and will not examine, those specific activities or their associated impacts on PG&E's accounting entries in any other proceeding.

CalCCA scrutinized PG&E's efforts to sell excess RA during 2022 because PG&E's efforts bear directly on the Power Charge Indifference Adjustment (PCIA) rates that both community choice aggregator (CCA) customers and bundled customers pay. RA sales proceeds are credited to all PCIA ratepayers. If PG&E makes inadequate efforts to sell RA, both CCA customers (customers of CalCCA's members) and bundled customers pay higher PCIA rates than they should pay, because PG&E would credit the PCIA with a lower quantity of sold RA. Moreover, PG&E's RA sales activities impact all LSEs (including CCAs), who must procure RA to meet their own RA program obligations. That is why examining PG&E's efforts to sell RA is a key part of the ERRR review of PG&E's portfolio management.

[REDACTED]

[REDACTED]³ Consistent with Appendix S, [REDACTED]

³ CalCCA-03C at 12-13.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Yet, PG&E ultimately identified—and counted towards its incremental system reliability procurement targets—nearly a gigawatt (923 MW) of excess RA capacity during the summer of 2022.⁷ While Decisions 21-03-056 and 21-12-015 (Summer Reliability decisions) permit PG&E to count excess RA capacity towards system reliability incremental procurement targets by transferring that capacity from the Portfolio Allocation Balancing Account (PABA) to the Cost Allocation Mechanism (CAM), PG&E may only do so after making “reasonable attempts” to sell that capacity to other LSEs.

PG&E’s RA sales activities during the 2022 record period raise two distinct but related concerns. First, PG&E has not adequately explained the glaring disconnect between [REDACTED] and the hundreds of megawatts of RA capacity it identified mere months later. Second, the record demonstrates PG&E did not make reasonable attempts to sell its excess RA capacity to other LSEs using [REDACTED] after identifying that capacity and before transferring that capacity to CAM.

In light of those failures, the Commission should not find that PG&E prudently managed its utility-owned generation (UOG) facilities (PG&E’s requested finding 1). Further, because

⁴ PG&E Prepared Testimony at 8-7.

⁵ CalCCA-04C, PG&E confidential response to CalCCA Data Request 3.31a.

⁶ *Id.*, PG&E confidential response to CalCCA Data Request 3.31b, c.

⁷ PG&E Prepared Testimony at 12-15.

PG&E's transfer of capacity from PABA to CAM impacts PG&E's entries recorded to the PABA, the Commission should not find that PG&E's entries recorded to the PABA are reasonable, appropriate, accurate and in compliance with Commission decisions (PG&E's requested finding 3). In addition, the Commission should scrutinize PG&E's assumptions about resource availability and the adjustments PG&E makes to its RA position in future proceedings to ensure any reductions to the excess RA capacity PG&E makes available to the market are justified. Finally, the Commission should revisit PG&E's BPP in the Integrated Resource Plan (IRP) proceeding to ensure PG&E is making its excess RA available to the market in a timely and comprehensive manner, including through solicitations and market offers outside the scheduled solicitation process.

I. BACKGROUND

A. PG&E's Efforts to Sell Excess RA Directly Impact PCIA Rates

CCA customers receive generation services from their local CCA and receive transmission, distribution, billing, and other services from PG&E. That means CCA customers in PG&E's service territory pay the same electric distribution, transmission and non-bypassable rates as PG&E's bundled customers. However, CCA customers pay CCA-specific generation rates, which vary and are partially influenced by local mandates to increase electric vehicle use, procure and maintain clean electricity portfolios that in many cases exceed state requirements for renewable generation, and achieve other local goals.⁸

CCA and other unbundled customers are also subject to several non-bypassable charges (NBC), including the PCIA and the CAM. The Commission adopted the PCIA to ensure that when IOU customers depart from bundled service and receive their electricity from a non-IOU provider,

⁸ CalCCA Protest at 4.

such as a CCA, “those customers remain responsible for costs previously incurred on their behalf by the IOUs—but only those costs.”⁹

The structure of the PCIA has evolved over the years. Prior to 2018, the PCIA rate was set only based on forecasts and not true-up for unbundled customers—only bundled customers’ generation rates were subject to a true-up (via the ERRA). Decision 18-10-019 transformed that ratemaking framework.¹⁰ That decision requires that PG&E true-up its forecasted costs (net of forecasted market revenues or imputed revenues) approved in its ERRA Forecast case with the actual recorded costs (net of actual market revenues or imputed revenues) for PCIA-eligible resources during the same year.¹¹ It also requires PG&E to true up the revenues it forecasted it would receive from both bundled and departing load customers over the course of the record year with the actual revenues it received.¹² This true-up occurs by comparing the forecasted costs and revenues to the recorded costs and revenues within the PABA on a rolling basis (whereas the true-up of costs to meet bundled customers’ energy and ancillary service requirements occurs in the ERRA).¹³ The ultimate result of the “rolling true-up”—in both ERRA and PABA—is PG&E recording either an under- or over-collection based on many factors tied to actual market costs, actual market revenues, and actual customer revenues from retail sales.¹⁴ That resulting under- or over-collection is then included in the revenue requirement for the following year’s ERRA and PCIA rates (for example, customers in 2023 paid the under- and over-collections that PG&E

⁹ Decision (D.) 18-10-019 at 3.

¹⁰ PGE-01 at 12-1:15-18.

¹¹ D.18-10-019, Ordering Paragraphs 7 and 8.

¹² *Id.*

¹³ *Id.* at Ordering Paragraphs 6, 7 and 8.

¹⁴ *See, e.g.* PGE-01 at 12-25, Table 12-7 (comparing 2022 actual recorded PABA portfolio costs compared to approved forecast)

recorded over the course of 2022).

Following D.18-10-019, therefore, PG&E's PCIA rates set in the ERRA Forecast proceeding are based not only on the Indifference Amount (the difference in the forecast year between the cost of the IOU's supply portfolio and the market value of the IOU's supply portfolio),¹⁵ but also the year-end balance in the PABA (the rolling true-up component of PCIA rates).¹⁶ The Indifference Amount and the year-end PABA over- or under-collection are added together to form the PABA revenue requirement underlying PCIA rates. The Commission initially determined the level of the 2022 PCIA for PG&E customers in D.22-02-002 based on a forecast of the above-market costs stemming from PG&E's generation portfolio over the course of 2022 and the 2021 year-end balance in the PABA. Similarly, the Commission initially determined the level of the 2023 PCIA in D.22-12-044 based on a forecast of the above-market costs over the course of 2023 and the 2022 year-end balance in the PABA. PG&E's entries to the PABA during 2022—which are a focus of this proceeding—therefore directly impact the PCIA rates CCA customers (and bundled customers) pay.¹⁷

Among the several important factors that impact PG&E's rolling true-up in the PABA is PG&E's sales of excess RA capacity. PG&E sells its excess RA to other LSEs that must also meet RA compliance obligations, just as other IOUs do. The amount of RA capacity PG&E sold to other LSEs during the record period, compared to the amount of RA PG&E forecasted it would sell, drives either an over- or under-collection in the PABA. That is because revenues from PG&E's sales of excess RA are an important offset to the costs recorded to the PABA during the record

¹⁵ D.19-10-001 at 10.

¹⁶ *Id.* at Conclusion of Law 21.

¹⁷ CalCCA-01C at 1:11-12.

year, which are recovered from bundled and unbundled customers. Excess RA that is not sold to third parties is classified as Unsold RA and valued at \$0 in the PABA,¹⁸ thereby providing no financial benefit to customers. PG&E's treatment of its excess RA capacity, therefore, directly impacts the PCIA rates CCA customers (and bundled customers) pay. To put a finer point on that dynamic: if PG&E makes inadequate efforts to sell its excess RA, that failure can result in bundled and unbundled customers paying higher PCIA rates than they should be paying. That is why examining PG&E's efforts to sell RA is a key part of the ERRA review of PG&E's portfolio management.

B. PG&E Counted Nearly a Gigawatt of Excess RA Capacity Towards its Incremental Procurement Targets During the Summer of 2022

During the summer of 2022, PG&E counted nearly a gigawatt of excess RA capacity—capacity in excess of its bundled customers' needs—towards its own incremental procurement requirement, after [REDACTED].¹⁹ Because PG&E recovers the costs of system reliability incremental procurement through the CAM, PG&E must transfer the value of excess RA capacity provided by existing RA resources from the applicable balancing account to the CAM balancing account (for PG&E, the New System Generation Balancing Account or NSGBA).²⁰ PG&E counted 923 MW of excess RA capacity from PCIA-eligible resources towards its incremental procurement targets during the months of June through October of 2022, and accordingly credited PABA and charged NSGBA for the value of that RA.²¹ PG&E valued that transfer at the Forecasted 2022 System RA Adder for June through

¹⁸ D.19-10-001 at Ordering Paragraph 3.e.

¹⁹ PGE-01 at 12-15.

²⁰ CalCCA-01C at 3:23-4:1.

²¹ *Id.* at 4:2-4.

September, and subsequently trued-up those entries through October and made an adjustment to account for the publishing of the Final System RA Adder.²² All told, PG&E transferred [REDACTED] from PABA to NSGBA over the five months. The table below details that transfer by month:

Table 1: System RA Transfer from PABA to NSGBA²³

	June	July	August	September	October	Total
RA Transferred to NSGBA (MW)	103.70	183.14	148.97	156.70	330.00	922.51
System RA Transferred to NSGBA \$/kW	[REDACTED]					

The central question in this case, therefore, is whether PG&E made reasonable attempts to sell nearly a gigawatt of excess RA capacity to other LSEs during the summer of 2022 before counting that capacity towards its own incremental procurement targets. CalCCA does not dispute the Commission’s Summer Reliability decisions authorize PG&E to use its excess RA capacity towards its incremental procurement obligations. Nor does CalCCA dispute the accuracy of PG&E’s accounting entries to PABA or NSGBA for the RA resources it counted. The Commission’s Summer Reliability decisions, however, allow PG&E to count its existing RA resources towards its system reliability incremental procurement targets only after PG&E makes reasonable attempts to sell its excess RA capacity to other LSEs.²⁴ As this brief discusses below,

²² *Id.* at 4:5-8.

²³ *Id.* at 4:10-11.

²⁴ R.20-11-003, Order Instituting Rulemaking to Establish Policies, Processes and Rules to Ensure Reliable Electric Service in California in the Event of an Extreme Weather Event in 2021, Phase 2 Decision Directing Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric Company to take Actions to Prepare for Potential Extreme Weather in the Summers of 2022 and 2023, D.21-12-015 at 183-184 (permitting PG&E to count excess resources in its existing portfolios toward its incremental system reliability procurement targets “provided it has made reasonable attempts to sell this excess capacity to other LSEs”). According to the Summer Reliability decisions, if PG&E has not met its procurement target for June and October, it may “use excess resources in its existing portfolio to meet the minimum contingency targets . . . *provided it has made reasonable attempts to sell this excess capacity to other LSEs.*” D.21-12-015, Phase 2 Decision Directing Pacific Gas and Electric Company,

PG&E did not make reasonable attempts to sell its excess RA capacity during the record period.

II. BURDEN OF PROOF AND LEGAL STANDARD

Public Utilities Code Section 451 establishes the foundational standard of review with respect to utility ratesetting:

All charges demanded or received by any public utility, or by any two or more public utilities, for any product or commodity furnished or to be furnished or any service rendered or to be rendered shall be just and reasonable. Every unjust or unreasonable charge demanded or received for such product or commodity or service is unlawful.²⁵

The Commission has also adopted specific standards of review for various aspects of the ERRA Compliance application. PG&E incorporates those standards into the findings it requests in its Application, which include:²⁶

1. That PG&E prudently administered and managed its utility-owned generation (UOG) facilities in compliance with all applicable rules, regulations and Commission decisions, and;

[. . .]
3. That the entries PG&E recorded in the Energy Resource Recovery Account (ERRA) and

Southern California Edison Company and San Diego Gas & Electric Company To Take Actions To Prepare For Potential Extreme Weather In The Summers of 2022 and 2023, Ordering Paragraph 72 (Dec. 6, 2021) (emphasis added); *see also* D.21-03-056, Decision Directing Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company To Take Actions to Prepare for Potential Extreme Weather In the Summers of 2021 and 2022, at Ordering Paragraph 79 (Mar. 26, 2021). Additionally, for the months of July, August, and September, PG&E may use its excess resources “to meet or supplement these procurement targets up to the upper end of its contingency procurement target . . . *provided it has made reasonable attempts to sell this excess capacity to other LSEs.*” D.21-12-015, Phase 2 Decision Directing Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company To Take Actions To Prepare For Potential Extreme Weather In The Summers of 2022 and 2023, Ordering Paragraph 73 (Dec. 6, 2021) (emphasis added); *see also* D.21-03-056, Decision Directing Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company To Take Actions to Prepare for Potential Extreme Weather In the Summers of 2021 and 2022, at Ordering Paragraph 80 (Mar. 26, 2021).

²⁵ Cal. Pub. Util. Code § 451.

²⁶ Application at 20.

the Portfolio Allocation Balancing Account (PABA) are reasonable, appropriate, accurate and in compliance with Commission decisions.

PG&E bears the burden of proof in ERRA Compliance proceedings as the applicant.²⁷ That burden of proof includes a burden of production, which in ERRA Compliance proceedings is a “preponderance of the evidence.”²⁸ In this case, PG&E has not met its burden of proof with respect to requested findings 1 and 3. In particular, PG&E has not adequately explained why its RA position shifted by several hundred megawatts between the time it prepared that position in advance of its scheduled solicitations and the time it applied excess RA towards its incremental procurement targets. Nor has PG&E demonstrated it made reasonable attempts to sell its excess RA to other LSEs prior to counting excess RA towards its incremental procurement targets. As a result, PG&E has not shown by a preponderance of the evidence that it prudently administered and managed its RA portfolio, nor that its entries recorded in the PABA—which reflect PG&E’s RA sales—are reasonable.

III. ARGUMENT

A. **PG&E [REDACTED] yet counted nearly a gigawatt of excess RA towards its procurement targets.**

Per the requirements of Appendix S to PG&E’s BPP, PG&E runs scheduled solicitations to sell RA products from its UOG portfolio. PG&E issued six solicitations offering to sell System RA for delivery during 2022.²⁹ PG&E held two year-ahead solicitations in August 2021 and October 2021, in which PG&E projected out the available RA for the full twelve months of 2022.³⁰

²⁷ D.16-04-006 at 11.

²⁸ D.12-11-051 at 9; D.09-03-025 at 8.

²⁹ CalCCA-01 at 7:15-16.

³⁰ *Id.* at 7:16-18.

PG&E also held four quarterly solicitations in November 2021, January 2022, April 2022, and July 2022, projecting the available RA for the remaining months of 2022 updated on a quarterly basis.³¹

PG&E's BPP Appendix S explains that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PG&E creates a projected RA position (a calculation of its available system RA capacity) at the time it holds each solicitation in order to determine the quantity of RA available for sale at that point in time.³⁵ Table 2 below summarizes PG&E's System RA position for the months of June through October 2022 as calculated at the time of each applicable solicitation.

³¹ *Id.* at 7:18-20.

³² *See* CalCCA-03C at 5 (Section B.1.b.(1).(a) of Appendix S to PG&E's BPP, describing [REDACTED]).

³³ CalCCA-01C at 5:9-11.

³⁴ *Id.* at 5:11-13.

³⁵ *Id.* at 5:14-15 (citing PG&E's response to Joint CCA Master Data Request 1.08).

Table 2: Summer System RA Position (MW)³⁶

RA Position Date		Jun-22	Jul-22	Aug-22	Sep-22	Oct-22
8/23/2021	System RA Position					
10/6/2021	System RA Position					
11/22/2021	System RA Position					
1/14/2022	System RA Position					
4/11/2022	System RA Position					
7/18/2022	System RA Position					

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Consistent with PG&E's BPP Appendix S, [REDACTED]

[REDACTED]³⁹ Table 3, below, summarizes the System RA PG&E offered for sale in each solicitation with delivery periods from June through October 2022 based on PG&E's projected System RA positions prepared at the time of each solicitation.⁴⁰

³⁶ *Id.* at 6:1-2.

³⁷ *Id.* at 6:3-5.

³⁸ *Id.* at 6:5-6.

³⁹ *Id.* at 8:9-11.

⁴⁰ *Id.* at 8:7-9 (citing PG&E's response to Joint CCA Master Data Request 1.08 Attachment 2 and CalCCA data request 2.57).

Table 3: Summer System RA Volumes Offered for Sale by Solicitation (MW)⁴¹

RA Position Date	System RA Volume Offered for Sale	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22
8/23/2021	Phase 1 2022 YA Solicitation					
10/6/2021	Phase 2 2022 YA Solicitation					
11/22/2021	Q1 Balance-of-Year Solicitation					
1/14/2022	Q2 Balance-of-Year Solicitation					
4/11/2022	Q3 Balance-of-Year Solicitation					
7/18/2022	Q4 Balance-of-Year Solicitation					

PG&E's offers to sell excess RA between July and October of 2022 stand in stark contrast with the near gigawatt of excess RA it counted towards its incremental procurement targets during the same time period. When asked to provide documentation demonstrating whether it received any offers from other LSEs to purchase any portion of the 923 MW of excess RA, PG&E responded that it "did not receive any bids from other LSEs to purchase any portion of the excess capacity *after it was known to be available.*"⁴²

Reviewing data from PG&E's RA solicitations tells a more complete story, however. Table 4 below details for each RA solicitation the bids submitted by third parties seeking to purchase System RA, but which PG&E rejected [REDACTED]

[REDACTED] Table 4 summarizes the number of bids rejected [REDACTED]

[REDACTED] As Table 4 demonstrates, [REDACTED]

[REDACTED]

[REDACTED].⁴³

⁴¹ *Id.* at 8:12-13.

⁴² *See id.*, Attachment B (PG&E's response to CalCCA data request 2.55 (emphasis added)).

⁴³ *See id.*, Attachment B (PG&E's response to CalCCA data requests 2.21, 2.23, and 2.54 Supplemental).

Table 4: Bids Rejected [REDACTED]

Solicitation	Solicitation Terms / Number of Bids / MWs Rejected									
	June 2022		July 2022		August 2022		September 2022		October 2022	
	# of Bids	MWs	# of Bids	MWs	# of Bids	MWs	# of Bids	MWs	# of Bids	MWs
Phase 1 2022 YA	[REDACTED]									
Phase 2 2022 YA										
Q1 2022 BOY Solicitation										
Q2 2022 BOY Solicitation										
Q3 2022 BOY Solicitation										
Q4 2022 BOY Solicitation										

Collectively, Tables 3 and 4 demonstrate [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Yet, as Table 1 above illustrates, only a short time later, PG&E counted 923 MW of excess RA capacity from PCIA-eligible resources towards its incremental procurement targets.⁴⁴ This raises two concerns. First, PG&E has not explained why its RA position changed so dramatically in a matter of months. Second, given that PGE&’s RA solicitations *came before* PG&E identified excess RA during the summer of 2022, PG&E has not demonstrated that it made reasonable, timely attempts to sell its excess RA capacity to other LSEs *after* that excess RA was known to be available.

B. The Commission Should Scrutinize the Adjustments PG&E Makes to its RA Position to Ensure Any Reductions to the Capacity PG&E Makes Available to the Market are Justified

As described earlier, PG&E determines its System RA position ahead of each solicitation by [REDACTED]

[REDACTED]

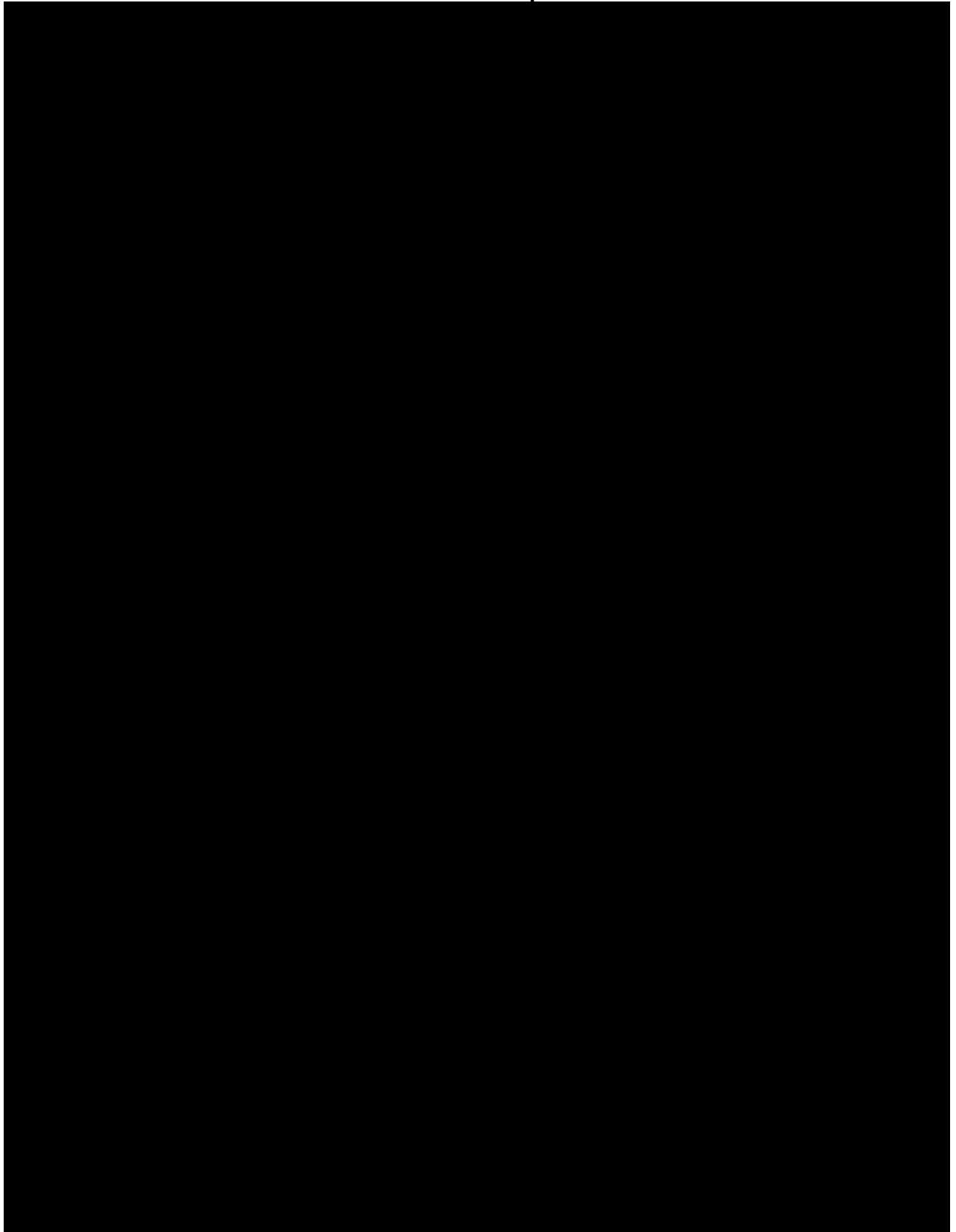
⁴⁴ *Id.* at 4:2-4.

[REDACTED]

[REDACTED]⁴⁵ Table 5 below details each of those line items as calculated by PG&E in its RA position reports for the summer 2022 delivery period. Table 5 also shows the change from the previous RA position for each component of the reports.

⁴⁵ See *CalCCA-03-C*, PG&E's Bundled Procurement Plan Appendix S Section B.3.b.1.a.

Table 5: RA Position Reports Detail⁴⁶



As Table 5 demonstrates, several line items that constitute PG&E's RA Position changed significantly each time PG&E calculated that position. One potential explanation for PG&E identifying significant excess RA (after projecting [REDACTED] ahead of its solicitations) is that certain line items in PG&E's RA position are impacted by resource availability and other adjustments to available capacity. To the extent PG&E has discretion with regard to its assumptions of resource availability, outage schedules, or operational constraints, it is likely to make conservative assumptions to ensure resources are used to meet PG&E's own compliance obligations rather than making those resources available to the market.⁴⁷

In response to CalCCA discovery on this issue, PG&E first dismissed CalCCA's concern by asserting that its bundled RA position "changed due to a variety of conditions."⁴⁸ In response to follow up discovery, PG&E offered [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. That is a

problem because, again, PG&E has an incentive to make conservative assumptions that ensure resources are available to meet PG&E's own compliance obligations (rather than making those resources available to other LSEs). To mitigate this risk, the Commission should scrutinize the adjustments PG&E makes to its RA position in future ERRA Compliance proceedings to ensure any reductions to the capacity PG&E makes available to the market through scheduled solicitations

⁴⁶ CalCCA-01C at 16.

⁴⁷ *Id.* at 17:15-19.

⁴⁸ CalCCA-04C, PG&E response to CalCCA data request 3.27.

⁴⁹ *Id.*, PG&E response to CalCCA data request 6.03.

are justified. Moreover, the Commission should expressly permit parties to examine the assumptions underlying PG&E's RA positions in future ERRRA Compliance proceedings.

C. PG&E Did Not Make Reasonable Attempts To Sell Its Excess RA During The Summer of 2022 After It Was Known to be Available.

In addition to scrutinizing the swings in PG&E's RA position, the Commission should examine PG&E's attempts to sell excess RA once PG&E identified that excess. PG&E states it identified the final quantity of excess RA capacity shown towards meeting Summer Reliability procurement targets between T-50 and T-30 days prior to each compliance month.⁵⁰ That means PG&E did not identify the final quantity of excess RA capacity counted towards meeting incremental procurement targets for July, August, and September 2022 until *after* its Q3 Balance of Year Solicitation (for which PG&E prepared an RA Position on April 11, 2022). Similarly, that timeline means PG&E did not identify the final quantity of excess RA capacity counted towards PG&E's incremental procurement target for October 2022 until *after* the Q4 Balance of Year Solicitation (for which PG&E prepared an RA position on July 18, 2022).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]⁵¹ In fact, in 2022, [REDACTED]

[REDACTED]⁵²

Yet, [REDACTED]

⁵⁰ *Id.*, PG&E response to CalCCA data request 3.26, 3.33.

⁵¹ *Id.*, PG&E response to CalCCA data request 7.01; CalCCA-03C at 13.

⁵² *Id.*, PG&E response to CalCCA data request 7.02, 7.03.

[REDACTED] In fact, [REDACTED]
[REDACTED] Instead, PG&E counted
hundreds of megawatts towards its own system reliability incremental procurement targets [REDACTED]
[REDACTED]
[REDACTED] Far from making “reasonable attempts” to sell the excess RA it identified, therefore,
PG&E [REDACTED]
[REDACTED]

D. The Commission Should Not Find PG&E Prudently Managed its RA Portfolio and Should Not Find PG&E’s PABA Entries are Reasonable

Scoping Issue 1 in this proceeding asks “[w]hether PG&E, during the record period, prudently administered and managed the following, in compliance with all applicable rules, regulations, and Commission decisions, including but not limited to Standard of Conduct (SOC) 4: a) Utility-Owned Generation Facilities, except for the Elkhorn Battery Energy Storage System and Pit 1 Powerhouse outages which will be reviewed in the 2023 ERRR Compliance proceeding; b) Qualifying Facilities (QF) Contracts; and c) Non-QF Contracts. If not what adjustments, if any, should be made to account for imprudently managed or administered resources?”⁵⁵

At a high level, Scoping Issue 1 requires the Commission to evaluate whether PG&E prudently administered and managed its generation portfolio (UOG and contracted resources) in

⁵³ *Id.*, PG&E response to CalCCA data request 7.05c, 7.06c, 7.07c, 7.08c [REDACTED]
[REDACTED]

⁵⁴ *Id.*, PG&E response to CalCCA data request 7.05d, 7.06d, 7.07d, 7.08d [REDACTED]
[REDACTED]

⁵⁵ Assigned Commissioner’s Scoping Memo and Ruling at 2.

2022. As a part of that broad evaluation, the Commission must assess whether PG&E administered and managed its RA resources prudently. That prudence assessment, in turn, includes assessing whether PG&E made reasonable efforts to ensure it received value for all its RA resources, a key consideration in determining whether PG&E has prudently managed its generation portfolio.

The Commission applies several standards to assess the prudence of PG&E's management and administration of its generation portfolio, including SOC 4, the Commission's Good Utility Practice standard and the "reasonable manager" standard.⁵⁶ SOC 4 requires utilities to prudently administer all contracts and generation resources and dispatch the energy in a least-cost manner.⁵⁷ The Commission has stated that prudent contract administration consistent with SOC 4 requires the utility "dispose of economic long power"—in other words, sell excess resources—among other activities.⁵⁸ In a similar vein, the "Good Utility Practice" standard requires utilities act consistent with:

"[A]ny of the practices, methods and acts engaged in or approved by a significant portion of the electric utility industry during the relevant time period, or any of the practices, methods and acts which, in the exercise of reasonable judgment in light of the facts known at the time the decision was made, could have been expected to accomplish the desired result at a reasonable cost consistent with good business practices, reliability, safety and expedition."⁵⁹

Lastly, the broad "reasonable manager" standard requires utilities act in a manner that "comport[s] with what a reasonable manager of sufficient education, training, experience and skills using the tools and knowledge at his disposal would do when faced with a need to make a decision and

⁵⁶ See e.g. D.20-12-036 at 9 (in SDG&E's 2018 ERRR Compliance proceeding, finding SDG&E complied with the Good Utility Practice and reasonable manager standards).

⁵⁷ D.02-10-062 at Conclusion of Law 11.

⁵⁸ D.02-12-074 at 54; see also D.05-04-036 at 24.

⁵⁹ D.02-12-069, Attachment A at 5.

act.”⁶⁰ Each of these standards permit the Commission to review whether the utility maximized the value of its RA resources for the benefit of its customers during the record period.

In the instant proceeding, PG&E has not demonstrated that it maximized the value of its RA resources for the benefit of its customers. PG&E [REDACTED] and then, after identifying hundreds of megawatts of excess RA just a few months later, [REDACTED] before transferring that capacity to CAM. The Commission should therefore not find that PG&E managed its UOG portfolio prudently. Moreover, given that PG&E’s RA sales directly impact its PABA entries (*i.e.*, sold RA is credited to the PABA), the Commission should not find that PG&E’s PABA entries for the 2022 record period are reasonable.

E. The Commission Should Revisit PG&E’s BPP in the IRP Docket

The record demonstrates PG&E’s RA position can fluctuate rapidly and significantly. It also demonstrates PG&E’s scheduled solicitations may not be a sufficiently flexible or robust means—standing alone—for ensuring that PG&E makes excess RA capacity available to the market in both a timely and comprehensive manner. While the Commission must review PG&E’s 2022 RA activities in this proceeding and should scrutinize PG&E’s RA positions and activities in future ERRR Compliance proceedings, the Commission should revisit PG&E’s BPP in the IRP proceeding to ensure that Appendix S delivers that outcome.

The Commission can, in this proceeding, order that PG&E’s BPP be revisited in the IRP docket.⁶¹ The IRP docket, as the successor to the Long-Term Procurement Plan dockets that gave rise to the most recent, full BPPs, is the appropriate place to evaluate BPP revisions. Specifically,

⁶⁰ D.90-09-088 at 499.

⁶¹ California PUC Docket No. R.20-05-003.

the initial Order Instituting Rulemaking (OIR) issued in the current IRP docket stated explicitly that the IRP docket was the correct venue for BPP revisions.⁶² This notion was reaffirmed by the Preliminary Scoping Memo included in the OIR.⁶³ Further, the Amended Scoping Memo, which currently controls the IRP docket, states that the IRP docket is anchored by, among other things, “[c]onsideration of the need for procurement by LSEs of electricity resources,” and that the current scope includes issues related to “[e]stablishing a process and cadence for performing reliability analysis and setting reliability planning and procurement requirements for LSEs . . . involv[ing] coordination with resource adequacy requirements[.]”⁶⁴ This Commission has reinforced this conclusion in other proceedings, suggesting that BPP procurement rules have not *yet* been addressed in the IRP docket.⁶⁵

Finally, the IRP docket provides a forum in which parties may workshop best practices for BPP provisions governing excess RA solicitations and market offers. While the Commission’s model non-disclosure agreement prevents discussion of the specifics of the confidential components of other IOUs’ BPPs in individual ERRA Compliance proceedings, the IRP docket is a consolidated proceeding in which parties may execute non-disclosure agreements that allow for the evaluation of each IOUs’ BPP in the same place. Accordingly, parties and the Commission can determine if other IOUs’ existing practices might complement PG&E’s practices and help ensure

⁶² R.20-05-003, Order Instituting Rulemaking at 2 (May 14, 2020).

⁶³ *Id.* at 10.

⁶⁴ R.20-05-003, Assigned Commissioner’s Amended Scoping Memo and Ruling Extending Statutory Deadline at 2, 9 (Apr. 18, 2024).

⁶⁵ D.23-12-008 at 23 (stating “BPPs were reviewed and adopted every two years via a Commission decision in the Long-Term Procurement Plan (LTPP) proceeding. Although the IOUs’ current BPPs were last approved, with modifications, by D.15-10-031 on October 22, 2015, in R.13-12-010, the IOUs have not filed a full update of their BPPs since then. Instead, the IOUs have updated various sections of their BPPs via advice letters as needed over the years. **The IRP proceeding is the successor proceeding to the LTPP proceeding, however, a complete review of the IOU BPPs and changes to BPP procurement rules has yet to be addressed.**” (emphasis added)).

PG&E makes excess RA available to other LSEs in an appropriate manner.

IV. CONCLUSION

For the reasons described in this brief, CalCCA respectfully urges the Commission to take the actions discussed herein and to grant any other relief the Commission deems just and reasonable.

Respectfully submitted,



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



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Application 23-02-018 A2302018

Application of Pacific Gas and Electric Company
for Compliance Review of Utility Owned
Generation Operations, Portfolio Allocation
Balancing Account Entries, Energy Resource
Recovery Account Entries, Contract Administration,
Economic Dispatch of Electric Resources, Utility
Owned Generation Fuel Procurement, and Other
Activities for the Record Period January 1 through
December 31, 2022

U 39 E

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
REPLY BRIEF**

PUBLIC VERSION

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SUBJECT MATTER INDEX

I.	ARGUMENT.....	3
A.	PG&E Has Not Demonstrated That It Prudently Administered Its Generation Portfolio During the Record Period.....	3
B.	The Commission Should Revisit PG&E’s BPP in the IRP Proceeding.	5
II.	CONCLUSION	6

TABLE OF AUTHORITIES

Commission Decisions

D.02-10-062.....	4
D.02-12-069.....	4
D.02-12-074.....	4
D.20-12-036.....	4
D.90-09-088.....	4

Rules of Practice and Procedure

Rule 13.12.....	1
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SUMMARY OF RECOMMENDATIONS

- The California Public Utilities Commission (Commission) should adopt the recommendations CalCCA makes in its opening brief.

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

Application of Pacific Gas and Electric Company for
Compliance Review of Utility Owned Generation
Operations, Portfolio Allocation Balancing Account
Entries, Energy Resource Recovery Account Entries,
Contract Administration, Economic Dispatch of
Electric Resources, Utility Owned Generation Fuel
Procurement, and Other Activities for the Record
Period January 1 through December 31, 2022

Application 23-02-018

U 39 E

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
REPLY BRIEF**

The California Community Choice Association¹ (CalCCA) submits this Reply Brief regarding the *Application of Pacific Gas and Electric Company (U 39 E) for Compliance Review of Utility Owned Generation Operations, Portfolio Allocation Balancing Account Entries, Energy Resource Recovery Account Entries, Contract Administration, Economic Dispatch of Electric Resources, Utility Owned Generation Fuel Procurement, and Other Activities for the Record Period January 1 Through December 31, 2022* (Application) pursuant to Rule 13.12 of the Rules of Practice and Procedure of the California Public Utilities Commission and the Administrative Law Judge's (ALJ) September 3, 2024 Ruling Setting the Proceeding Schedule.²

Pacific Gas & Electric Company's (PG&E) opening brief skirts the central question in this

¹ California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance of Southern California, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

² Administrative Law Judge's Ruling Setting the Proceeding Schedule (Sept. 3, 2024), available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M539/K203/539203270.PDF>.

case: Whether PG&E made reasonable attempts to sell its excess Resource Adequacy (RA) to other load-serving entities (LSE) during the summer of 2022 before counting that capacity towards its own incremental procurement targets. PG&E’s failure to address that question is concerning because, as its testimony (but not its opening brief) acknowledges, PG&E counted nearly a **gigawatt** of excess RA towards its own incremental procurement targets rather than selling that capacity to other LSEs during the record period.³ Moreover, PG&E did so after [REDACTED] [REDACTED].⁴

CalCCA expects PG&E will, in its reply brief, argue its 2022 RA sales solicitations comply with its Bundled Procurement Plan (BPP)—a point CalCCA does not challenge. But that defense should not end the Commission’s inquiry. [REDACTED] [REDACTED].⁵ As CalCCA’s testimony and exhibits demonstrate, PG&E did not make reasonable attempts to sell its excess RA capacity to other LSEs [REDACTED] [REDACTED] after identifying that capacity and before counting that capacity towards its incremental procurement targets.

While PG&E’s opening brief does not meaningfully engage with the central question in this case, CalCCA’s opening brief thoroughly addresses PG&E’s 2022 RA sales activities. This brief does not repeat those arguments, but makes the following two points.

First, CalCCA responds to PG&E’s discussion of Scoping Issue 1. PG&E asserts it prudently administered its utility-owned generation (UOG) facilities and dismisses CalCCA’s evidence on PG&E’s RA sales as “the subject of Scoping Issue 5.”⁶ PG&E takes an unduly narrow view of Scoping Issue 1. The legal standards applicable to Scoping Issue 1 permit the Commission

³ PG&E-01 at 12-15.

⁴ CalCCA-04C, PG&E confidential response to CalCCA Data Request 3.31a.

⁵ CalCCA Opening Brief at 18.

⁶ PG&E Opening Brief at 7.

to review whether the utility maximized the value of its generation portfolio—including its RA resources—for the benefit of its customers during the record period. The record demonstrates PG&E did not maximize the value of its RA resources for the benefit of its customers, and therefore, the Commission should not find that PG&E prudently managed its UOG facilities during the record period.

Second, PG&E’s opening brief demonstrates why the Commission must revisit PG&E’s BPP in the Integrated Resource Plan (IRP) proceeding. Again, PG&E asserts it complied with Appendix S of its BPP⁷ but does not explain why it nevertheless ended up with nearly a gigawatt of excess RA at a time when the RA market was constrained. The IRP proceeding is the right forum for the Commission to consider best practices in RA sales, compare practices across utilities, and ensure PG&E makes its excess RA available to LSEs in an appropriate manner going forward.

I. ARGUMENT

A. PG&E Has Not Demonstrated That It Prudently Administered Its Generation Portfolio During the Record Period

PG&E asserts it prudently administered its UOG facilities and generation contracts, and CalCCA’s testimony “does not present any evidence to the contrary.”⁸ Not so. CalCCA’s testimony and exhibits demonstrate PG&E did not make reasonable attempts to sell excess RA to other LSEs after identifying that excess and before counting it towards PG&E’s system reliability incremental procurement targets during the summer of 2022.⁹

The fundamental flaw affecting PG&E’s argument with respect to Scoping Issue 1 is that PG&E recites, but glosses over, the relevant legal standards. The Commission applies several standards to assess the prudence of PG&E’s management and administration of its generation

⁷ *Id.* at 9-10.

⁸ *Id.* at 7.

⁹ *See* CalCCA Opening Brief at 10-19.

portfolio, including Standard of Conduct (SOC) 4, the Commission’s Good Utility Practice standard and the “reasonable manager” standard.¹⁰ SOC 4 requires utilities to prudently administer all contracts and generation resources and dispatch the energy in a least-cost manner.¹¹ The Commission has stated that prudent contract administration consistent with SOC 4 requires the utility “dispose of economic long power”—in other words, sell excess resources—among other activities.¹² In a similar vein, the “Good Utility Practice” standard requires utilities act consistent with:

“[A]ny of the practices, methods and acts engaged in or approved by a significant portion of the electric utility industry during the relevant time period, or any of the practices, methods and acts which, in the exercise of reasonable judgment in light of the facts known at the time the decision was made, could have been expected to accomplish the desired result at a reasonable cost consistent with good business practices, reliability, safety and expedition.”¹³

Lastly, the broad “reasonable manager” standard requires utilities act in a manner that “comport[s] with what a reasonable manager of sufficient education, training, experience and skills using the tools and knowledge at his disposal would do when faced with a need to make a decision and act.”¹⁴ Each of these standards permit the Commission to review whether the utility maximized the value of its generation portfolio—which includes its RA resources—for the benefit of its customers during the record period.

Thus, CalCCA’s testimony and exhibits concerning PG&E’s RA sales activities are squarely within and concern Scoping Issue 1. PG&E has not met its burden of proof with respect to Scoping Issue 1 because the record demonstrates PG&E [REDACTED]

¹⁰ See, e.g. A.19-05-007, D.20-12-036 at 9 (in SDG&E’s 2018 ERRRA Compliance proceeding, finding SDG&E complied with the Good Utility Practice and reasonable manager standards).

¹¹ D.02-10-062, Conclusion of Law 11 (Oct. 24, 2002).

¹² D.02-12-074 at 54 (Dec. 19, 2002); see also D.05-04-036 at 24.

¹³ D.02-12-069, Attachment A at 5 (Dec. 19, 2002).

¹⁴ D.90-09-088 at 499.

[REDACTED],¹⁵ and then, after identifying hundreds of megawatts of excess RA just a few months later, [REDACTED] before counting that capacity towards its incremental procurement targets.¹⁶ The Commission should not, therefore, find that PG&E prudently administered its generation portfolio during the record period.

B. The Commission Should Revisit PG&E’s BPP in the IRP Proceeding.

With respect to PG&E’s scheduled solicitations for the sale of RA with delivery during the summer of 2022, CalCCA does not challenge PG&E’s compliance with Appendix S of its BPP. The problem, however, is that notwithstanding those solicitations, PG&E ended up with nearly a gigawatt of excess RA capacity during the summer of 2022, and did not make reasonable attempts to sell that capacity *after* identifying it. PG&E’s opening brief does not acknowledge or engage with this disconnect, and instead focuses on its compliance with Appendix S of its BPP.

PG&E’s “bare minimum” approach is exactly the reason the Commission should revisit PG&E’s BPP in the IRP proceeding. As CalCCA explained in its opening brief, the IRP docket provides a forum in which parties may workshop best practices for BPP provisions governing excess RA solicitations and market offers. While the Commission’s model non-disclosure agreement prevents discussion of the specifics of the confidential components of other IOUs’ BPPs in individual ERRA Compliance proceedings, the IRP docket is a consolidated proceeding in which parties may execute non-disclosure agreements that allow for the evaluation of each IOUs’ BPP in the same place. Accordingly, parties and the Commission can determine if other IOUs’ existing practices might complement PG&E’s practices. This would help ensure PG&E makes

¹⁵ CalCCA-01C at 8:12-13.

¹⁶ CalCCA-04C, PG&E response to CalCCA data request 7.05c, 7.05d, 7.06c, 7.06d, 7.07c, 7.07d, 7.08c, 7.08d.

excess RA available to other LSEs in a proactive and timely manner, rather than simply “ticking the box” on RA sales.

II. CONCLUSION

For the reasons described in its testimony and briefs, CalCCA respectfully urges the Commission to adopt the recommendations listed in CalCCA’s opening brief and to grant any other relief the Commission deems just and reasonable.

Respectfully submitted,



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