

REGULATORY UPDATE FOR MARCH 18, 2025 (WEEK OF MARCH 10, 2025)

CALIFORNIA PUBLIC UTILITIES COMMISSION (CPUC OR COMMISSION)¹

Proposed Decisions and Resolutions

None to report.

Voting Meeting

The CPUC held a voting meeting in Santa Clara, California on March 13, 2025 at 11:00 am PT. The following are <u>results</u> for energy related items on the agenda:

Item 3. Resolution (Res) E-5364 (Modifications to the Inputs and Assumptions Used in Bill Savings Estimates in Solar Disclosure Document). This Resolution updates the inputs and assumptions used in bill savings estimates provided to potential residential solar customers by solar providers to align with the net billing tariff. Following Commission adoption of this resolution and the stakeholder review process, the California Contractors State License Board will make any edits suggested by the Commission or stakeholders if they are consistent with the requirements of Business and Professions Code § 7169(c) and finalize the Solar Energy System Disclosure Document. Pursuant to Decision (D.) 23-11-068 and D.22-12-056, this disclosure document is incorporated into the required documentation necessary to interconnect residential solar and storage systems under the net energy metering and net billing tariff. Approved.

Item 4. Res E-5372 (San Diego Gas & Electric Company Utility Owned Energy Storage Contract and Related Costs). This Resolution approves San Diego Gas & Electric Company's (SDG&E) request for approval of a utility-owned energy storage contract procured to address 2025 summer reliability. The contract is a Build, Own, and Transfer contract with CED Westside Canal Battery Storage LLC (RWE AG) for 100 megawatts (MW) of nameplate capacity. This Resolution approves the requested relief in Advice Letter 4556-E. **Approved.**

Item 11. Rulemaking (R.) 18-07-005 (Order Instituting Rulemaking to Consider New Approaches to Disconnections and Reconnections to Improve Energy Access and Contain Costs). This decision denies the petition for modification of D. 23-08-049, jointly filed by Pacific Gas and Electric Company (PG&E), SDG&E, Southern California Edison Company, and Southern California Gas Company (SoCalGas) (together, the Large IOUs) on August 23, 2024. The Large IOUs requested that the Commission modify D.23-08-049 to allow them to record incremental costs to implement their payment plans in a memorandum account. The decision finds that the issues the Large IOUs raised would properly have been the subject of an

¹ Per the CPUC's Rules of Practice and Procedure Rule 14.3, comments on proposed decisions are due 20 days after issuance of the proposed decision, and reply comments are due five days thereafter. Comments on draft resolutions are due 20 days after the draft resolution appears in the CPUC's daily calendar, per Rule 14.5.



application for rehearing of the decision. Specifically, that a petition for modification is appropriate when a party asserts that unanticipated events arose after the decision was issued, which is not the case here, and therefore the petition for modification was denied. Signed, D.25-03-004.

Item 13. Petition 24-09-013 (Petition for Modification of General Order 167-B). This decision denies the petition of the Independent Energy Producers Association (IEPA) to open a rulemaking to amend General Order (GO) 167-B. IEPA's petition argued that the proposed workshop method is procedurally deficient, alleging that the workshops were not properly noticed as to the proposed changes presented by the Commission's Electric Safety and Reliability Branch during the workshops and that GO-167-B, Section 15.8 requires a rulemaking be opened for any amendments to GO-167-B. The Commission finds that Public Utilities Code Section 1708.5(f) grants the Commission's resolution process, to amend a prior Commission regulation. Regarding IEPA's allegations regarding Commission staff's workshop process, the Commission finds that this is not the appropriate venue to consider such complaints. **Signed, D.25-03-005.**

Item 15. Res E-5375 (PG&E and NRG Business Marketing Bilateral Contract). This Resolution denies the request of PG&E to approve the sale of 100,000 Portfolio Content Category 1 2025 delivery Renewable Energy Credits (RECs) to NRG Business Marketing, LLC via a bilateral transaction. The Commission finds that PG&E diverged from its approved Renewable Portfolio Standard (RPS) Sales Framework in its procurement and evaluation methodology. **Approved**.

Item 18. Application (A.) 24-08-002 (PacifiCorp Application for Approval of its 2025 Energy Cost Adjustment Clause and Greenhouse Gas-Related Forecast and Reconciliation of Costs and Revenue). This decision approves the partial settlement agreement between all parties regarding issues raised with respect to the California Greenhouse Gas Emissions Allowance program costs and Climate Credits in PacifiCorp's 2025 Energy Cost Adjustment Clause application. The decision also approves a semi-annual California Climate Credit for 2025 for residential and small business customers of \$259.36, an increase of 48.8%. Signed, D.25-03-007.

Item 20. A.21-06-021 (PG&E General Rate Case). This decision grants the unopposed "Joint Petition for Modification of D.23-11-069 for Implementation of an Agreement among PG&E, the Public Advocates Office, and The Utility Reform Network on Non-Wildfire Liability Insurance." This grant includes the Commission's approval of the "Agreement Among Pacific Gas and Electric Company, The Utility Reform Network and the Public Advocates Office at the California Public Utilities Commission to Jointly Petition to Modify D.23-11-069 on Non-Wildfire Liability Insurance." As a result, PG&E will establish the self-insurance framework stated in the agreement for a portion of its non-wildfire liability insurance coverage, thereby providing an opportunity for ratepayer savings in a few years consistent with the Commission's ongoing efforts to address utility bill affordability. The amount to be collected in rates for non-wildfire liability insurance in 2025 and 2026 remains unchanged. **Signed, D.25-03-008**.

Item 46. Res ESRB-13 (Modification of General Order 167). This Resolution adopts GO 167-C to: (1) implement the Senate Bill (SB) 1383 mandate to establish standards for the maintenance



and operation of Energy Storage Systems; (2) apply SB 38 requirements for Emergency Response and Emergency Action Plans to Energy Storage System Owners; (3) require Generating Asset Owners to coordinate with local authorities in developing their emergency plans; (4) establish Logbook Standards for Energy Storage Systems and Renewable Generating Assets and revise Logbook Standards for each Generating Asset; (5) modify Maintenance and Operation Standards for Generating Assets; (6) add provisions to enhance safety and effectiveness of Generating Assets and Energy Storage Systems operation and maintenance; (7) update procedures, references, and definitions; (8) remove obsolete references and add relevant language; and (9) update applicable industry codes, standards, and organizations. GO 167 establishes standards for electric generating facilities to ensure that they are effectively maintained and operated to ensure safe and reliable service. **Approved.**

Upcoming Events and Workshops

SURGE Webinar on AB 2143 (Prevailing Wage) Requirements. The Solar-Utilities Reporting, Guidance, and Education (SURGE) initiative will host a webinar on March 25, 2025, 12:30 pm - 1:30 pm PT, via Microsoft Teams to provide information on the reporting process for solar contractors who need to comply with the prevailing wage requirements established pursuant to Assembly Bill (AB) 2143 and Public Utilities Code section 769.2. Event details and registration are available <u>here</u>.

High Distributed Energy Resource Proceeding Workshop on Data Tools and Cybersecurity (R.22-11-013). The CPUC will host a workshop on Monday, March 24, 2025 and April 28, 2025, 2:00 pm - 5:00 pm PT, to discuss data tools and cybersecurity issues related to distributed energy resource planning and optimization. Interested parties may attend by registering <u>here</u>.

Vehicle-Grid Integration Forum. The CPUC is convening an in-person VGI Forum on Wednesday, April 16, 2024, 9 am - 4:30 pm. The Forum will be conducted by Joint IOUs (PG&E, SCE, and SDG&E) and will be centered around the following issues: (1) rates and demand flexibility programs; (2) technology enablement; and (3) planning. Attendees should register here, and a remote viewing option will be available for those unable to attend in person.

CALIFORNIA INDEPENDENT SYSTEM OPERATOR (CAISO)

Stakeholder Initiatives: Upcoming Meetings and Deadlines

Interconnection Customer User Group. CAISO is establishing a new Interconnection Customer user group, which will meet every other Tuesday at 1 pm PT, beginning on March 18, 2025. This call provides an opportunity to discuss industry questions and concerns regarding infrastructure policies and processes, including transmission planning and development, interconnection, deliverability, and contracting. Registration is required. Further information is available <u>here</u>.

Subscriber Participating Transmission Owner Market Scheduling Options. CAISO has posted the draft final proposal for the Subscriber Participating Transmission Owner Market



Scheduling Options initiative, and will host a public stakeholder call on March 21, 2025 to discuss this proposal. Further information is available <u>here</u>.

Congestion Revenue Rights Enhancements. CAISO has extended the comment deadline to March 26, 2025, for the Congestion Revenue Rights Enhancements working group call held on February 27 and March 12. Further information is available <u>here</u>.

Distributed Generation Deliverability Assessment. CAISO has posted the distributed generation deliverability assessment results for the 2025 cycle. Eligible distributed generation facilities that are seeking an initial or increase in deliverability status must apply for deliverability status assignment. Further information is available <u>here</u>.

2024 Transmission Plan Deliverability Allocation Report. CAISO has posted the revised 2024 Transmission Plan Deliverability Allocation Report to its website, available <u>here</u>.

Extended Day-Ahead Market Congestion Revenue Allocation. CAISO will host a hybrid stakeholder workshop regarding the Extended Day-Ahead Market Congestion Revenue Allocation on March 24, 2025. CAISO also published an issue paper on March 17 ahead of the stakeholder meeting. Attendees may choose to participate virtually or in person. In-person attendance registration is due March 21, 2025. Further information is available <u>here</u>.

Market Performance and Planning Forum. CAISO has scheduled the first quarter Market Performance and Planning Forum on March 20, 2025. Further information and the agenda are available <u>here</u>.

2025 Annual Interregional Coordination Meeting. CAISO will host the Annual Interregional Coordination Meeting in person at its Folsom offices on March 24, 2025. Attendees may choose to participate in person at the CAISO, or virtually. Further information is available <u>here</u>.

Western Energy Markets Regional Issues Forum. The Western Energy Markets Regional Issues Forum will take place at PacifiCorp in Portland, Oregon on April 9, 2025. Registration is requested for in-person attendees. Additional information is available <u>here</u>.

2025 CAISO Legal Forum. CAISO will host its Legal Forum on Thursday, April 10, 2025 at its headquarters in Folsom, California. This event provides opportunities for legal professionals from the energy industry to network, discuss current legal topics, gain Minimum Continuing Legal Education credit, and tour the CAISO control room overlook. Further information is available <u>here</u>.

CALIFORNIA ENERGY COMMISSION (CEC)

2024 Integrated Energy Policy Report (IEPR) Update

The CEC is working on its 2024 IEPR Update and ongoing workshops were held through December 2024 to develop the record. The policy recommendations included in the 2024 IEPR



Update will be based on the record developed during the proceedings, including data and technical analyses by staff and stakeholders. Comments on the draft IEPR were due in early January 2025. According to the <u>workshop schedule</u> published in December 2024 (which is subject to change), potential adoption of the 2024 IEPR Update was initially scheduled for the March 17, 2025 Business Meeting. However, upon review of the March 17 meeting agenda, there is no mention of the 2024 IEPR Update. Thus, the 2024 IEPR Update remains in <u>draft form</u>.

2025 IEPR

On March 14, 2025, the CEC provided an updated workshop <u>Notice</u> for the 2025 IEPR. Workshop topics and dates included in the notice are below (note: the workshop schedule is subject to change):

- May 7, 2025: IEPR Staff Workshop on Electricity Forms & Instructions (remote access only)
- June 16, 2025: IEPR Commissioner Workshop on Interconnection
- June 25, 2025: IEPR Commissioner Workshop on Load Flex Goal Analysis Update
- July 29, 2025: IEPR Commissioner Workshop on Hydrogen (Senate Bill 1075) and Zero Carbon Resource (Senate Bill 423)
- August 6, 2025: IEPR Commissioner Workshop on Inputs & Assumptions (remote access only)
- August 26, 2025: IEPR Commissioner Workshop on Load Modifier Design (remote access only)
- November 13, 2025: IEPR Commissioner Workshop on Load Modifier Results (remote access only)
- December 11, 2025: IEPR Commissioner Workshop on Forecast (remote access only)

Electrification Summit

Last week, the CEC hosted the second annual Electrification Summit in Sacramento. The summit themes included healthy buildings, clean industry, and empowered communities. Day 1 information (including the <u>Day 1 Notice and agenda</u>) is available <u>here</u> and Day 2 information (including the <u>Day 2 Notice and agenda</u>) is available <u>here</u>.

2025 California Demand Flexibility Summit

On February 18, 2025, the CEC circulated a "Save the Date" email notification regarding the 2025 California Demand Flexibility Summit. The California Demand Flexibility Summit will be held at the UC Davis Conference Center on May 22, 2025. According to the Save the Date, the summit will provide an "opportunity to discuss the progress and challenges in achieving California's load shift goal of 7,000 megawatts by 2030." Registration for the California Demand Flexibility Summit is <u>now open</u>.



Tribal Energy Summit

On March 18, 2025, the CEC hosted a <u>Tribal Energy Summit</u> at the California Natural Resources Agency building in Sacramento, California. Additional details regarding the summit are available in the <u>Notice</u>. This was an in-person only event.

RPS Annual Reports

The CEC issued a notice for certified facilities subject to the annual reporting obligation to report generation and fuel use data to submit their reports by April 1, 2025. Additional details regarding the reporting requirements are available <u>here</u>.

Demand Side Grid Support (DSGS) Program Guidelines

On March 17, 2025, the Deputy Executive Director for Energy and Climate Policy of the CPUC wrote to the CEC to request that consideration of the DSGS Program Guidelines, Fourth Edition, which appear as Item No. 7 on the Business Meeting agenda, be held for further discussion. The letter states that Option 4 in the proposed DSGS Program Guidelines overlaps substantially with PG&E's Automated Response Technology (ART) program, targeting the same market segments and devices, and is likely to undermine the new resource adequacy benefits and other goals of the market-integrated ART program.

Zero Emissions Vehicles

The CEC hosted a workshop on March 18, 2025 to obtain public input regarding a potential upcoming solicitation that would aim to demonstrate electric vehicle charging solutions that integrate direct current-coupled solar microgrids and connect to the electric grid through flexible service agreements.

CEC Business Meetings

The CEC Business Meeting was on March 17, 2025. The meeting agenda and backup materials are available <u>here</u>.

CALIFORNIA AIR RESOURCES BOARD (CARB)

Low Carbon Fuel Standard (LCFS) Regulation Update

On February 25, 2025, CARB received a document from the Office of Administrative Law (OAL) detailing requested non-substantive revisions to the text of the LCFS regulation amendments. The LCFS regulation sets a declining carbon intensity target for transportation fuels used in California. Staff has 120 days to make these changes and re-submit the regulation



for OAL approval. The current regulation remains in effect as CARB staff work to address the feedback from OAL.

Meetings and Workshops

On March 19, 2025, the California Environmental Protection Agency and CARB will hold an in-person public workshop to help inform major elements of California's Comprehensive Climate Action Plan. The Comprehensive Climate Action Plan is a key deliverable under U.S. EPA's Climate Pollution Reduction Grants Program and will describe approaches to achieve the state's existing near- and long-term climate targets. Below is information on timing and location:

Date:	March 19, 2025
Time:	5:00 pm - 6:30 pm PT (arrive at $4:50 pm$ to sign in)
Location:	375 Beale St., San Francisco, CA 94105

CARB will hold two public workshops conducted jointly with the California Department of Conservation Geologic Energy Management Division (CalGEM) to discuss joint rulemaking activities related to California SB 1137. CARB's presentation will focus on the development of performance standards for the emissions detection systems required within the leak detection and response plans that operators of oil and gas production wells and production facilities located within 3,200 feet of certain populated areas (health protection zones) must submit to CalGEM for approval under the new legislation. CalGEM's presentation will focus on the process to make permanent emergency regulations regarding health protection zones for oil and gas operations.

The <u>workshops</u> will be held on the evenings of Wednesday, March 19, 2025 and Thursday, March 20, 2025, via remote access through Zoom.

Opportunities for Public Comment

CARB has extended the public comment period for information to aid in the implementation of new climate-related disclosure laws, SB 253 and SB 261. Comments may be submitted <u>here</u> until March 21, 2025.

MINNESOTA PUBLIC UTILITIES COMMISSION (MPUC)

On March 20, 2025, the MPUC will consider whether to find that the Electric Utilities subject to Minnesota's Renewable Energy Objective complied with their standard obligations for 2023, and whether any action is required against noncompliant Electric Utilities (MPUC Docket Nos. E999/PR-24-12; E999/PR-02-1240). The Renewable Energy Objectives seek to ensure utilities make "good faith efforts" to generate or procure sufficient electricity generated by an eligible energy technology to provide service meeting the statutory requirements set forth in Minn. Stat. § 216B.1691.



FEDERAL ENERGY REGULATORY COMMISSION (FERC)

On March 20, 2025, at 10:00 am ET, FERC will hold the March 2025 Commission Open Meeting. The agenda is available <u>here</u>.