

VALLEY CLEAN ENERGY ALLIANCE

Staff Report – Item 6

To: Board of Directors

From: Keyes & Fox, Regulatory Consultant

Subject: Regulatory Monitoring Report – Keyes & Fox

Date: September 11, 2025

Please find attached Keyes & Fox's July/August 2025 Regulatory Memorandum dated September 3, 2025 an informational summary of the key California regulatory and compliance-related updates from the California Public Utilities Commission (CPUC).

Attachment: Keyes & Fox Regulatory Memorandum dated September 3, 2025

Valley Clean Energy Alliance

Regulatory Monitoring Report

To: Valley Clean Energy Alliance (VCE) Board of Directors

From: Sheridan Pauker, Partner, Keyes & Fox LLP
Jason Hoyle, Director of Research, EQ Research, LLC

Subject: Monthly Regulatory Update

Date: September 3, 2025

Keyes & Fox LLP and EQ Research LLC are pleased to provide VCE's Board of Directors with this informational memo describing key California regulatory and compliance-related updates from the California Public Utilities Commission (CPUC) over the past two months.

NEW Climate Credit OIR

Background: This rulemaking will explore potential approaches to maximize the effectiveness at supporting customer affordability of cap-and-trade program proceeds returned to electric consumers via the state Climate Credit.

Recent Developments: On July 28, the CPUC issued the [OIR](#) establishing a new proceeding to improve the California Climate Credit. The Climate Credit partially distributes funds from the proceeds of carbon allowance sales under the state's cap-and-trade program as twice annual lump-sum bill credits to all electric customers and certain qualifying small businesses.

Analysis: The proceeding may consider options for modifying the use of the Climate Credit by exploring eligibility criteria for distributions, the timing of distributions, and education and outreach efforts.

Next Steps: Comments on the OIR are due September 26 and reply comments are due October 13.

Additional Information: [OIR](#) (Aug. 20, 2025); Docket No. [R.25-07-013](#).

NEW Distribution Interconnection Rules

Background: This rulemaking will review and refine distribution-level interconnection rules under Electric Rule 21, particularly those for distributed energy resources for PG&E, SCE, SDG&E and the small and multijurisdictional electric utilities.

Recent Developments: On August 20, the CPUC issued the [OIR](#) establishing a new proceeding to review and refine Rule 21 distribution-level interconnection regulations. The OIR identifies 8 broad topics within the preliminary scope, including electrical independence tests, interconnection timelines and disputes, EV interconnections, non-exporting resource interconnections, cost sharing of upgrade costs and costs due to load reduction, Net Billing Tariff implementation, costs and standards for communications and interoperability of distributed energy resources and IOUs' Wholesale Distribution Access Tariff (WDAT) tariffs and consistency with Rule 21. An August 29 staff email clarified that the purpose of providing a 60-day extended comment period on the OIR was to encourage stakeholders to comment extensively and thoughtfully regarding any and all issues, priorities, and proposals that may be appropriate to the rulemaking.

Analysis: This proceeding will impact the future development and deployment of distributed energy resources statewide.

Next Steps: Comments on the OIR are due October 20 and reply comments are due November 10.

Additional Information: [OIR](#) (Jul. 25, 2025); Docket No. [R.25-08-004](#).

IRP Rulemaking (2025)

Background: This new proceeding governs the biennial Integrated Resource Plan (IRP) process, including load serving entity (LSE) procurement requirements, the establishment of a variety of state- and LSE-level load and procurement forecasts, greenhouse gas (GHG) reduction targets, ongoing reliability obligations, and the Commission's oversight of the IOUs' bundled procurement plans. This proceeding continues the work of R.20-05-003 and will be the primary forum for most future CPUC work on the Reliable and Clean Power Procurement Program framework (RCPPP).

Recent Developments: Opening comments on the [OIR](#) were filed on August 1 and reply comments were filed August 15. On August 18, the ALJ issued a [Ruling](#) granting CalCCA's motion to extend the deadline for LSEs to submit their load forecasts for the upcoming IRP until September 12. On August 28, an ALJ [Ruling](#) scheduled the prehearing conference for September 29.

Analysis: Comments on the OIR emphasized the need for a six-month minimum time period from issuance of the Ruling IRP specifying contents of the upcoming IRPs until the IRPs are due, which would make the next IRPs due in February or March of 2026, if adopted. CalCCA also commented that the proceeding should consider transmission and non-transmission alternatives to address reliability needs in the most cost-effective manner to reduce reliance on gas resources, how to ensure that Department of Water Resources (DWR) central procurement is effective and efficient, the development of a structured process for LSEs to request waivers of penalties for Mid-Term Reliability (MTR) noncompliance and other issues.

Next Steps: An ALJ ruling on the contents of IRP filings was expected in August but is delayed, and IRP filings will be due no earlier than December 1. LSE load forecasts are now due September 12. The prehearing conference will be held September 29.

Additional Information: [Ruling](#) on prehearing conference (Aug. 28, 2025); [Ruling](#) on load forecasts (Aug. 18, 2025); [OIR](#) (Jul. 2, 2025); Docket No. [R.25-06-019](#).

IRP Rulemaking (2020)

Background: This proceeding governs the biennial Integrated Resource Plan (IRP) process, including load serving entity (LSE) procurement requirements, the establishment of a variety of state- and LSE-level load and procurement forecasts, greenhouse gas (GHG) reduction targets, and ongoing reliability obligations. This proceeding will consider a Staff Proposal on the RCPPP, and remaining work on the RCPPP will occur in the new IRP rulemaking, R.25-06-019.

Recent Developments: On July 15, parties filed comment on the RCPPP [Staff Proposal](#) whose stated goal is to give LSEs a more predictable regulatory framework for procurement requirements, with longer lead times, as compared with the “order-by-order” Mid-Term Reliability Procurement the Commission has ordered in the past several years ([Summary Slides](#)). On July 21, American Clean Power California (ACPC) filed a [Motion](#) requesting a new expedited procurement requirement for resources that would be eligible to take advantage of the expiring federal tax credits. On August 5, parties filed responses to the ACPC Motion and reply comments on the RCPPP. On August 13, the CPUC issued a [Proposed Decision](#) that would grant and expand on SCE’s Petition for Modification and eliminate the use of “bridge” contracts for mid-term reliability procurement compliance entirely.

Analysis: In reply comments on the ACPC Motion, the IOUs and CCAs generally did not support the proposed new expedited procurement due largely to the short timeframe and its potential to further increase prices and conflict with existing procurement requirements. In comments on the RCPPP Staff Proposal, CalCCA argued that LSEs’ investments should not be undermined by regulatory changes, the framework should be transactable, take practical realities into account (supply chain, interconnection delays, federal policy) and adopt a penalty waiver process and the CPUC should coordinate with the CEC to improve load forecast accuracy and the Commission should adjust the Slice-of-Day reliability framework. The Proposed Decision eliminating the use of bridge contracts presents many uncertainties for LSEs which have procured and contracted based on the previous rule allowing such contracts.

Next Steps: Comments on the Proposed Decision are due September 2, reply comments are due September 8, and the Proposed Decision may be adopted, at earliest, at the CPUC’s September 18 meeting. Information about the 2025 IRP filing is expected soon.

Additional Information: RCPPP [Staff Proposal](#) and [Summary Slides](#) (Jul. 15, 2025); [Proposed Decision](#) (Aug. 13, 2025); ACPC [Motion](#) (Jul. 21, 2025); [Amended Scoping Memo and Ruling \(Correction/Clarification\)](#) (Apr. 18, 2024); Docket No. [R.20-05-003](#).

RA Rulemaking (2025-2026)

Background: This proceeding considers resource adequacy (RA) requirements for LSEs and will address the 2025 and 2026 RA compliance years, local RA procurement obligations for the 2025-2028 compliance years, and further development of the 24-hour Slice-of-Day (SOD) framework. Track 3 is focused on remaining RA capacity issues, including what planning reserve margin (PRM) the Commission should require for LSE RA procurement obligations.

Recent Developments: On July 28, the Western Power Trading Forum filed an [Application for Rehearing](#) (AFR) of D.25-06-048, arguing that the 18% Planning Reserve Margin for RA compliance in 2026 and 2027 is insufficient to meet state reliability goals. The IOUs filed a joint response on August 12 in opposition to the AFR. On August 21, the CPUC issued the [2023 RA Report](#). The report summarizes LSE compliance with the Commission’s RA requirements for 2023, average System RA prices, lists citations for violations of RA rules and discusses the GHG emissions of each LSE.

Analysis: The 2023 RA Report found that CPUC-jurisdictional LSEs collectively met their System RA obligations for all months in 2023, the weighted average System RA pricing in September 2023 was 93% higher than that in 2022, the CPUC issued 24 citations for 56 RA violations in 2023 for a total of \$24,388,462. The report also describes a new, publicly available RA citations database, and shows that VCE had the lowest citation amount of any CCA in 2023.

Next Steps: N/A

Additional Information: [Application for Rehearing](#) (Jul. 28, 2025); [2023 RA Report](#) (Aug. 21, 2025); [D.25-06-048](#) (Jun. 27, 2025); CalCCA [Analysis](#) (Apr. 25, 2025); [Scoping Memo and Ruling](#) (Dec. 18, 2023); [OIR](#) (Oct. 16, 2023); Docket No. [R.23-10-011](#).

RPS Rulemaking

Background: This proceeding addresses ongoing Renewables Portfolio Standard (RPS) requirements, including legislative mandates, and other matters related to the purchase of renewable energy. This proceeding is the forum for review of VCE's RPS Procurement Plan and RPS Compliance reports.

Recent Developments: On July 28, parties filed comments on Retail Sellers' Draft 2025 RPS Procurement Plans. On August 1, VCE submitted its [2024 RPS Compliance Report](#). On August 18, the CPUC issued [D.25-08-009](#) denying the large IOUs' request for the CPUC to adopt a framework for pre-approval of short-term RPS transactions based on the transactions' compliance with achievable, upfront standards.

Analysis: No parties filed comments on VCE's Draft 2024 RPS Procurement Plan.

Next Steps: A proposed decision on Draft RPS Plans is expected in Q4 2025.

Additional Information: VCE [RPS Compliance Report](#) (Aug. 1, 2025); VCE [2025 Draft RPS Plan](#) (Jun. 30, 2025); [Ruling](#) on 2025 RPS Plans (Apr. 17, 2025); [Notice](#) of RPS Plan Approval (Apr. 3, 2025); VCE [Final 2024 RPS Procurement Plan](#) (Jan. 22, 2025); [D.24-12-035](#) (Dec. 24, 2024); [Scoping Memo and Ruling](#) (May 9, 2024); [OIR](#) (Feb. 1, 2024); Docket No. [R.24-01-017](#).

Demand Flexibility

Background: This rulemaking was opened to update the CPUC's rate design principles and guidance for advancing demand flexibility, and to modify, consolidate, or eliminate existing dynamic rate pilots. Phase 1-Track A established an income-graduated fixed charge (IGFC) for residential rates for all investor-owned electric utilities in accordance with Assembly Bill 205 (Stats. 2022, ch. 61). Phase 1-Track B first adopted rate design and demand flexibility principles and then expanded VCE's AgFIT Pilot throughout PG&E distribution territory.

Recent Developments: On August 29, the CPUC issued [D.25-08-049](#) adopting guidelines for the large IOUs' demand flexibility (DF) rate design protocols and closing the proceeding. The Decision includes specific provisions requiring the allowing CCAs to develop their own dynamic rates and requiring the IOUs to provide detailed descriptions of how they will collaborate with CCAs on multiple features of demand flexibility rates. The Decision also specifically identifies the AgFIT program as an example of an acceptable demand flexibility rate. CalCCA, in its [comments](#) on the proposed decision, encouraged the Commission to keep the proceeding open to establish the systems and processes needed to enable CCAs to offer demand flexibility rates to their customers and encouraged the Commission to expand the IOU reporting requirements related to collaboration with CCAs.

Analysis: The Decision closed the proceeding without addressing several issues relating to CCA collaboration and dynamic rates and pilots which the commission intends to address in future proceedings. LSEs such as CCAs have the ability to offer demand flexibility rates based on the characteristics of their customer base and also have the option to develop their own dynamic generation rate. Additionally, the Decision requires IOUs to provide a detailed description in their rate proposals of how they will collaborate with CCAs.

Next Steps: The proceeding is closed.

Additional Information: [D.25-08-049](#) (Aug. 29, 2025); PG&E [AL 7627-E](#) (Jun. 27, 2025); PG&E [AL 7592-E](#) (May 7, 2025); [Final Evaluation](#) of VCE's AgFIT Pilot (Apr. 25, 2025); [D.24-01-032](#) (Jan. 26, 2024); [Phase 1 Scoping Memo and Ruling](#) (Nov. 2, 2022); [OIR](#) (Jul. 22, 2022); Docket No. [R.22-07-005](#).

PCIA/ERRA Reform

Background: This Rulemaking considers updates and reforms to the Energy Resource and Recovery Account (ERRA) and Power Charge Indifference Adjustment (PCIA) rules and processes with the objectives of improving existing rules, mitigating rate volatility, and ensuring indifference among bundled and departing customers. The proceeding includes an expedited Track 1 to revise the resource adequacy (RA) market-price benchmark (MPB) calculation methodology and for the revised methodology to be used in the October 2025 MPBs, and Track 2 will consider broader issues.

Recent Developments: On July 28, Applications for Rehearing of [D.25-06-049](#) were filed by [CalCCA](#) and [San Jose Clean Energy/Ava Community Energy](#). Both Applications challenge the changes to the calculation of the RA MPB.

Analysis: Track 1 changes will have an impact on PCIA charges beginning in 2026.

Next Steps: The Decision's changes to the RA MPB will be implemented in the Fall Update this October. A scoping memo for Track 2 is expected.

Additional Information: Applications for Rehearing of [CalCCA](#) and [Ava/SJCE](#) (Jul. 30, 2025); [D.25-06-049](#) (Jun. 27, 2025); [Scoping Memo](#) (Apr. 8, 2025); ALJ [Ruling](#) (Mar. 21, 2025); [Ruling](#) & [Staff Report](#) on RA MPB (Feb. 26, 2025); [OIR](#) (Feb. 26, 2025); Docket No. [R.25-02-005](#).

PG&E 2027 Phase 1 GRC

Background: Phase 1 General Rate Case (GRC) proceedings determine PG&E's overall revenue requirement and classification of costs by function for a set period (in this case, 2027-2030).

Recent Developments: On July 31, the Assigned Commissioner issued a [Scoping Memo and Ruling](#). The scope includes consideration of issues raised by CalCCA and other parties, such as customer demand and load forecasting for electrification, load flexibility, data center load forecasts, staffing analysis, and pending loads. In addition, the Scoping Memo confirms that all the issues from PG&E's Application Section IX.F are within scope, including re-vintaging issues related to reinvestments in utility-owned generation assets.

Analysis: CalCCA's [Protest](#) focused on the issue of re-vintaging for PG&E's proposed reinvestments in its utility-owned generation assets in this case.

Next Steps: Public hearings will be held in October and November 2025. Intervenor testimony is due in February 2026.

Additional Information: [Scoping Memo and Ruling](#) (Jul. 31, 2025); [Application](#) (May 16, 2025); Docket No. [A.25-05-009](#).

PG&E 2023 Phase 2 GRC

Background: Phase 2 General Rate Case (GRC) proceedings determine PG&E's marginal cost of service and revenue requirement allocation among customer classes for a set period (in this case, 2023-2026).

Recent Developments: On August 18, in response to PG&E's August 14 notification that the company identified an error in the calculation of marginal distribution capacity costs (MDCC), the ALJ issued an email [Ruling](#) temporarily suspending the schedule.

Analysis: N/A

Next Steps: The schedule is suspended and PG&E is required to propose a modified schedule by October 1.

Additional Information: [Ruling](#) (Aug. 18, 2025); [Request](#) for scoping amendment (Jun. 12, 2025); PG&E [AL 7588-E](#) (May 2, 2025); [Scoping Memo](#) (Mar. 21, 2025); [Application](#) (Sep. 30, 2024); Docket No. [A.24-09-014](#).

PG&E 2026 ERRa Forecast

Background: The annual Energy Resource and Recovery Account (ERRA) forecast proceedings establish the amount of the Power Charge Indifference Adjustment (PCIA) and other non-bypassable charges (NBCs) for the following year, as well as fuel and purchased power costs associated with serving bundled customers that utilities may recover in rates.

Recent Developments: On July 30, PG&E submitted [AL 7663-E](#) providing notification that the 4% ERRA trigger threshold had been reached as a result of an over-collection. On July 31, the Assigned Commissioner issued a [Scoping Memo and Ruling](#).

Analysis: The ERRA trigger notice is submitted when the ERRA account is more than 4% over- or under-collected from the prior year's generation revenues. PG&E expects the balance to self-correct and be less than 1% by the end of 2025.

Next Steps: Intervenor testimony is due September 2, rebuttal testimony is due September 23, and the Fall Update will be submitted on October 15.

Additional Information: [Scoping Memo and Ruling](#) (Jul. 31, 2025); PG&E [AL 7663-E](#) (Jul. 30, 2025); PG&E 2026 ERRA Forecast [Application](#) (May 15, 2025); Docket No. [A.25-05-011](#).

PG&E 2024 ERRa Forecast (Consolidated Track 2)

Background: See PG&E 2026 ERRA Forecast background. The April 2 [Scoping Memo and Ruling](#) consolidated all three major IOUs' ERRA forecast proceedings for the sole purpose of addressing issues related to the definition of and accounting for "fixed generation costs" in a Track 2.

Recent Developments: On July 31, the CPUC issued [D.25-07-014](#) adopting a definition of "fixed generation costs" that will be used during evaluation of the large IOUs' (PG&E, SCE, SDG&E) annual ERRA applications, and closing the proceeding. The Decision adopts the definition of fixed generation costs as "costs that do not change based on the amount of electricity customers use or the amount of operating time associated with the electricity generation." This definition - unchanged from the Commission's initial proposal in August 2023 - will be used consistently across the large electric utilities in ERRA proceedings. Other issues related to the common costs addressed in the large electric utilities' ERRA applications (e.g., re-vintaging of utility-owned generation resources) are not addressed in this decision.

Analysis: The decision is intended to standardize the treatment of these costs across all the IOUs.

Next Steps: The proceeding is closed.

Additional Information: [D.25-07-014](#) (Jul. 31, 2025); [Scoping Memo & Ruling](#) (Oct. 11, 2024); ALJ [Ruling](#) on Track 2 schedule (May 1, 2024); Joint CCA [Motion](#) (Apr. 26, 2024); IOU [Motion](#) (Apr. 25, 2024); [Scoping Memo and Ruling](#) (Apr. 2, 2024); [D.23-12-022](#) (Dec. 19, 2023); [Scoping Ruling and Memo](#) (Sep. 15, 2023); ERRA Trigger [Application](#) (Jul. 28, 2023); CalCCA [Protest](#) (Jun. 16, 2023); PG&E 2024 ERRA Forecast [Application](#) (May 15, 2023); Docket No. [A.23-05-012](#).

PG&E 2024 Erra Compliance

Background: The annual Erra Compliance proceeding reviews the utility's compliance with CPUC-approved standards for generation-procurement and cost recovery activity occurring in the prior year, such as energy resource contract administration, least-cost dispatch, fuel procurement, and balancing account entries.

Recent Developments: No recent developments.

Analysis: N/A

Next Steps: Intervenor testimony is due September 15, a status conference on the need for evidentiary hearings is set for November 14, and briefs are due in early 2026.

Additional Information: [Scoping Memo and Ruling](#) (May 2, 2025); [Joint Prehearing Conference Statement](#) (Apr. 16, 2025); [Ruling](#) (Mar. 27, 2025); PG&E 2024 Erra Compliance [Application](#) (Feb. 28, 2025); Docket No. [A.25-02-013](#).

Provider of Last Resort Rulemaking

Background: A Provider of Last Resort (POLR) is the utility or other entity that has the obligation to serve all customers (PG&E currently serves in this role for VCE's service area). Phase 1 of this proceeding concluded in April 2024 and addressed POLR service requirements, cost recovery, and options to maintain GHG emission reductions in the event of an unplanned customer migration to the POLR. Phase 2 builds on Phase 1 to set the requirements and application process for non-IOU entities to serve as the POLR. Phase 3 will address specific issues not resolved in Phase 1 or 2.

Recent Developments: On July 29, the CPUC issued [Final Resolution E-5406](#) addressing the financial monitoring and reporting requirements that were adopted in D.24-04-009, adopting CalCCA's requested financial monitoring, and reporting guidelines for implementation of D.24-04-009.

Analysis: The Resolution will implement the CCA monitoring and reporting requirements under the new POLR rules established last year. The Resolution provides additional details and clarity on the expanded financial monitoring requirements. The Resolution clarifies when financial reporting requirements are triggered and adds additional details about how the financial security ratios are to be calculated.

Next Steps: A ruling on the need for legal briefs in Phase 2 is expected in 2025 and resolution of the Threshold Questions is expected 2025, after which the primary topic areas will be addressed.

Additional Information: [Final Resolution E-5406](#) (Jul. 29, 2025); ALJ [Ruling](#) (May 28, 2025); PG&E [AL 7596-E](#) and [7596-E-A](#) (May 12 & 28, 2025); [Scoping Memo and Ruling](#) (Oct. 24, 2024); ALJ [Ruling](#) (Aug. 6, 2024); Joint CCA [Advice Letter](#) on new registration (Jul. 17, 2024); [Joint CCA Advice Letter](#) on financial modeling and reporting guidelines (Jul. 1, 2024); [D.24-04-009 / Appendix](#) (Apr. 22, 2024); [OIR](#) (Mar. 25, 2021); Docket No. [R.21-03-011](#).

City and County of San Francisco Municipalization

Background: The City and County of San Francisco (SF or City) filed this Petition for a determination by the CPUC of just compensation for acquisition by the City of PG&E property (PG&E distribution system within SF transmission assets needed for operational control, a substation and related assets) pursuant to Public Utilities Code §1401-1421. Briefing was filed in August of 2022.

Recent Developments: On August 21, PG&E filed a [Motion to Compel](#) San Francisco to provide further responses to several data requests. On August 26, PG&E submitted a [Motion to Enforce](#) ALJ Lirag's October 2024 Order issued in response to a previous Motion to Compel.

Analysis: This proceeding has consisted of discovery disputes since inception, but the Amended Scoping Memo issued on July 1 sets a schedule for the remainder of the proceeding.

Next Steps: A decision on just compensation methodology is expected in Q3 2025. The City's amended testimony is due in Q4 2025, followed by PG&E opening testimony in Q1 2026, City rebuttal testimony in Q2 2026, and hearings in Q3 2026. Briefs and reply briefs are due in 3Q 2026, and a decision on valuation is expected in Q1 2027.

Additional Information: PG&E [Motion to Enforce](#) (Aug 26, 2025); PG&E [Motion to Compel](#) (Aug. 21, 2025); [Amended Scoping Memo](#) (Jul. 1, 2025); [Petition](#) (Jul. 27, 2021); Docket No. [P.21-07-012](#).

PG&E Billing System Modernization

Background: This proceeding addresses PG&E's plan to upgrade its legacy billing system, some portions of which date back to the mid-1990s. PG&E proposed a three-stage upgrade that would ultimately be complete in Q4 2029 and cost an estimated \$761.3 million.

Recent Developments: On August 19, the CPUC issued [D.25-08-008](#) authorizing PG&E to establish accounts to track its billing modernization initiative expenditures. On August 20, PG&E filed a [Joint Case Management Statement](#), including the positions of CCAs in PG&E territory, and on August 25, it filed an amended version of the [Statement](#). An August 28 [Ruling](#) sets evidentiary hearings for September 22 through September 25 and provides instructions related to hearings.

Analysis: Issues related to CCA concerns such as bill presentation, improvements to billing data access and quality, CCA service fees, and others will be covered during the evidentiary hearings.

Next Steps: The evidentiary hearing will be held September 22 – 25. A proposed decision is expected in Q1 2026.

Additional Information: [Joint Case Management Statement](#) (Aug. 20, 2025); [D.25-08-008](#) (Aug. 19, 2025); Joint CCA [Testimony](#) (Jun. 30, 2025); [Scoping Memo](#) (Mar. 27, 2025); [Joint Prehearing Conference Statement](#) (Jan. 17, 2025); [Application](#) (Oct. 23, 2024); Docket No. [A.24-10-014](#).

PG&E 2026 Cost of Capital

Background: Cost of capital proceedings are held every three years to establish a utility's return on equity (ROE) and overall rate of return (ROR). The Commission established a uniform cost of capital mechanism for the large investor-owned utilities that includes a review 3-year cycle and provides for formula-based interim adjustments based on a bond market index.

Recent Developments: On July 16, the Assigned Commissioner issued a [Scoping Memo and Ruling](#) and consolidated the test year 2026 cost of capital proceedings for PG&E, SCE, SDG&E, and SoCalGas.

Analysis: This proceeding will address topics such as the appropriate capital structure, cost of equity, and cost of debt that determine the financing and profit portion of rates for all utility investments.

Next Steps: The evidentiary hearing will be held September 2 – 4. Opening briefs are due September 19, reply briefs are due October 3, and a proposed decision is expected in November.

Additional Information: [Scoping Memo and Ruling](#) (Jul. 16, 2025); ALJ [Ruling](#) (May 29, 2025); [Application](#) (Mar. 20, 2025); Docket No. [A.25-03-010](#).

Building Decarbonization

Background: This proceeding explores reduction of greenhouse gas (GHG) emissions associated with energy use in buildings. The current Phase 4 will consider whether modifications to electric line extension rules would assist under-resourced customers, electric baseline allowance modifications to encourage building decarbonization, and new programmatic approaches to building decarbonization.

Recent Developments: On July 15, PG&E submitted [AL 7642-E](#) providing an update on its Q1 2025 electric line extension expenditures.

Analysis: N/A

Next Steps: N/A

Additional Information: PG&E [AL 7642-E](#) (Jul. 15, 2025); [D.25-06-034](#) (Jun. 20, 2025); PG&E [AL 5074-G/7615-E](#) (Jun. 5, 2025); [Scoping Memo and Ruling](#) (Jul. 1, 2024); [OIR](#) (Feb. 8, 2019); Docket No. [R.19-01-011](#).

EV Rates & Infrastructure

Background: This rulemaking is the successor to [R.18-12-006](#) and will focus on issues related to 1) timely energization of electric vehicle (EV) charging, 2) transportation electrification grid planning to support charging infrastructure deployment, 3) deployment of behind-the-meter (BTM) charging infrastructure to support state goals, 4) vehicle-grid integration (VGI), and 5) ongoing transportation electrification policy development and collaboration.

Recent Developments: On June 16, the large IOUs submitted their [Joint Report](#) on the CPUC's Submetering and Telematics Workshop, and also submitted their [Joint Report](#) on the Vehicle-Grid Integration Workshop.

Analysis: N/A

Next Steps: N/A

Additional Information: [Joint Report](#) on the CPUC's Submetering and Telematics Workshop (Jun. 16, 2025); [Joint Report](#) on the Vehicle-Grid Integration Workshop (Jun. 16, 2025); [Scoping Memo and Ruling](#) (Apr. 12, 2024); [OIR](#) (Dec. 20, 2023); Docket No. [R.23-12-008](#).

Utility Safety Culture Assessments

Background: This rulemaking will define safety culture concepts and determine how the safety culture of PG&E and other utilities in California will be assessed and evaluated. The CPUC's Office of Energy Infrastructure Safety will conduct annual wildfire safety-specific assessments of investor-owned utilities as required by AB 1054, and an independent third-party evaluator will conduct safety culture assessments every five years per SB 901. Phase 1 of this proceeding focused on developing safety culture assessments for the large electric and natural gas IOUs, and Phase 2 will develop safety culture assessments for small multi-jurisdiction utilities (SMJUs) and the gas storage operators.

Recent Developments: On August 26, the Assigned Commissioner issued a [Scoping Memo and Ruling](#) for Phase 2.

Analysis: Phase 2 is focused on application of safety culture to the SMJUs, determining reporting requirements, and how what size threshold differences justify reduced requirements.

Next Steps: PG&E's first third-party evaluation is scheduled for August 1, 2028. Annual reports are due August 1 of each year between third-party evaluations.

Additional Information: [Scoping Memo and Ruling](#) (Aug. 26, 2025); [D.25-01-031](#) (Jan. 23, 2025); [OIR](#) (Oct. 7, 2021); Docket No. [R.21-10-001](#).

Diablo Canyon 2026 Rates & VPF

Background: During the period of extended operations for the Diablo Canyon Nuclear Plant, PG&E submits an annual application forecasting its costs, market revenues from CAISO, net costs allocated to ratepayers of each large IOU, and its plan for use of volumetric performance fees (VPFs) in the upcoming calendar year.

Recent Developments: On July 2, the Assigned Commissioner issued a [Scoping Memo and Ruling](#). Intervenor testimony was filed July 24. On August 29, an ALJ [Ruling](#) directed PG&E to file additional information on its proposed revisions to the escalation factor used to determine its management fees.

Analysis: N/A

Next Steps: Opening briefs are due October 1, and reply briefs are due October 22. A proposed decision is expected in Q3.

Additional Information: ALJ [Ruling](#) (Aug. 29, 2025); [Scoping Ruling and Memo](#) (Jul. 2, 2025); [Application](#) (Mar. 28, 2025); Docket No. [A.25-03-015](#).

Disconnections and Reconnections

Background: This proceeding addresses approaches to the disconnection and reconnection of electric customers with a focus on improving energy access and cost containment.

Recent Developments: No recent developments.

Analysis: N/A

Next Steps: Heat-based disconnection threshold proposals must be implemented by May 1, 2026.

Additional Information: [D.25-06-012](#) (Jun. 17, 2025); Phase 2 [Scoping Memo](#) (Jul. 15, 2022); [OIR](#) (Jul. 20, 2018); Docket No. [R.18-07-005](#).

Other Dockets

The following table identifies other tracked dockets that are closed or inactive.

Docket	Name	Status
R.19-09-009	Microgrids	D.24-11-004 adopting implementation rules for multi-property microgrid tariffs and closing the proceeding was issued November 18. Proceeding reopened for pending Application for Rehearing and Petition for Modification .
R.23-03-007	Wildfire Fund NBC 2024-2026	The CPUC issued D.24-12-001 (Dec. 9, 2024) adopting a \$5.95/MWh Wildfire NBC for 2025 - a slight increase from the 2024 WF NBC charge of \$5.61/MWh.
A.22-05-002	Demand Response Programs (2023-2027)	D.24-04-006 , issued April 24, 2024, ended the Demand Response Auction Mechanism (DRAM) pilot programs of PG&E, SCE, and SDG&E and closed the proceeding. Proceeding reopened by Petition for Modification (PFM) (Feb. 2025), which would be denied by a Proposed Decision for Sept. 18 meeting.
A.21-06-021	PG&E 2023 Phase 1 GRC	This proceeding is inactive, but it remains open to provide further guidance on metrics relevant to auditor reports, to consider revising the energization cost recovery mechanism, and to establish reporting requirements for reviewing the reasonableness of PG&E's interim rate recovery in its next GRC.
R.23-01-007	Diablo Canyon Extension	This proceeding was closed in June 2025 with issuance of D.25-06-002 .
A.24-02-012	PG&E 2023 ERRa Compliance	This proceeding was closed in June 2025 with issuance of D.25-06-007 .
A.23-02-018	PG&E 2022 ERRa Compliance	This proceeding was closed in June 2025 with issuance of D.25-06-004 .
A.22-02-015	PG&E 2021 ERRa Compliance	This proceeding was closed in June 2025 with issuance of D.25-06-045 , but was reopened in response to an August 2025 Application for Rehearing .