

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

Order Instituting Rulemaking to Establish
Energization Timelines

Rulemaking 24-01-018

**CLEAN COALITION COMMENTS ON PROPOSED DECISION ESTABLISHING A
STANDARD OFFER FOR FLEXIBLE SERVICE CONNECTIONS**

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I. INTRODUCTION

Pursuant to Rule 14.3 of the Rules of Practice and procedure of the California Public Utilities Commission (“the Commission”), the Clean Coalition submits comments on the *Proposed Decision* (“PD”) *Establishing a Standard Offer for Flexible Service Connections* (“FSC”), issued on December 24, 2025. The PD adopts a standard offer FSC for Pacific Gas & Electric (“PG&E”) and Southern California Edison (“SCE”) that must include at least three seasons and two daily values. The Standard Offer is to be developed as part of the energization process, rather than a unique Rule or Tariff. In addition, the PD requires PG&E and SCE to facilitate data collection and reporting needed to streamline the FSC process.

Clean Coalition is supportive of the Commission’s efforts to develop a standard FSC designed to be available to customers in the “very near term”.¹ Beginning with a simple solution that is scalable will help demonstrate the value of FSCs and shed light on beneficial refinements. Load growth is leading to an increase in the number of grid upgrades that the utilities need to conduct, and with existing backlogs, waiting times have the potential to inhibit progress and economic development. An applicant should have the ability to seek a FSC in any of the investor-owned utility (IOU) service territories; the economic advantage of a speedy connection to the grid can be significant, even if the timeline for completing a grid upgrade is not necessarily years long. We offer the following recommendations:

- The Decision should include SDG&E in the requirement to develop a standard offer FSC to create parity amongst IOUs, rather than limiting FSCs to PG&E and SCE.
- Conclusion of Law 13 should be changed to require the IOUs to offer a third daily value where doing so aligns with grid conditions or California’s decarbonization goals.

¹ PD, at p .4.

II. DESCRIPTION OF PARTY

The Clean Coalition is a nonprofit organization whose mission is to accelerate the transition to renewable energy and a modern grid through technical, policy, and project development expertise. The Clean Coalition drives policy innovation to remove barriers to procurement and interconnection of distributed energy resources (“DER”) — such as local renewables, demand response, and energy storage — and we establish market mechanisms that realize the full potential of integrating these solutions for optimized economic, environmental, and resilience benefits. The Clean Coalition also collaborates with utilities, municipalities, property owners, and other stakeholders to create near-term deployment opportunities that prove the unparalleled benefits of local renewables and other DER.

III. COMMENTS

A. San Diego Gas & Electric should also be required to develop a standard FSC, in addition to PG&E and SCE.

The Commission commits a legal error in the PD by restricting the development of a standard offer FSC to PG&E and SCE. The PD fails to justify differences in the IOU service territories that might merit only requiring two of the three large IOUs to develop FSCs. Although the proceeding was created by the passage of Assembly Bill 50 and Senate Bill 410 to address energization backlogs of SCE and PG&E, the issue of FSCs is a broader conversation about an interconnection agreement that is valuable throughout the IOU service territories and should be available in all. Unless SDG&E works with PG&E and SCE, the lessons learned from existing pilots will be missed, making the process for SDG&E unnecessarily resource intensive. Therefore, Clean Coalition strongly supports amending the PD to include all three of the IOUs.

B. The standard offer FSC should be required to include at least 2 daily signals, and 3 in the event that a third signal aligns with grid conditions or advances state decarbonization goals.

By requiring the FSC to have at least three seasons and two daily values, the PD attempts to ensure that implementing FSCs is operationally feasible for PG&E and SCE and easily comprehensible for FSC customers. This is a foundational first step toward flexibility that is time-differentiated on a more granular basis. The PD addresses FSCs in the context of interconnection but stops short of noting that FSCs can be effective signals to developers/customers to maintain a consumption profile aligned with grid needs and state

decarbonization goals. Solely focusing on grid capacity ignores the ability to synergistically meet multiple policy objectives by using FSC signals to incentivize a customer to increase demand at times when grid energy is the cleanest. Even as a bridging solution, FSCs offer a way to shape customer consumption patterns on a longer-term basis and support the deployment of other complementary solutions such as energy efficiency, load management, demand response, etc...

While the Proposed Decision's requirement of at least two daily capacity values represents a reasonable starting point, the Commission should consider whether limiting FSCs to only two daily periods may inadvertently undermine California's decarbonization objectives. In particular, a two-period structure risks encouraging usage during late-night "super off-peak" hours that may be operationally unconstrained from a grid perspective but highly emissions-intensive due to reliance on natural gas, while failing to sufficiently promote beneficial usage during midday periods when renewable generation is abundant.²

Clean Coalition recommends that the PD be amended either to require at least three daily values, or to require the IOUs to provide at least two daily capacity values, along with a third daily value where doing so would advance state decarbonization and grid-optimization objectives, particularly in locations with high solar penetration or emissions-driven constraints.

IV. CONCLUSION

The Clean Coalition appreciates the opportunity to submit these comments on the PD. We urge the Commission to mandate all of the IOUs must design a standard offer FSC (including SDG&E) and require three daily signals.

Sincerely,

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² <https://clean-coalition.org/news/the-importance-of-robust-daytime-ev-charging/>

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