

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

Order Instituting Rulemaking to Establish  
Energization Timelines

Rulemaking 24-01-018

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

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January 23, 2026

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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 reply comments on the *Proposed Decision* (“PD”) *Establishing a Standard Offer for Flexible Service Connections* (“FSC”), issued on December 24, 2025. Clean Coalition supports the following recommendations:

- Revise the definition of “upstream capacity” in the PD to include the primary and secondary distribution grid.
- Require the IOUs to demonstrate how customers can access Limited Load Profile prior to submitting an application.
- Create an average and maximum timeline for responding to customer applications.
- Mandate the creation of a Unit Cost Guide for Rule 15/16.
- The PD should require the IOUs to clarify in Advice Letters how on-site solar will be treated in engineering reviews.
- The record should be developed before requiring systems with non-certified PCS to stay within emergency rating limits.
- The PD should be amended to require customer benefits rather than ratepayer benefits from FSCs.

**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. Advanced Energy United**

Clean Coalition supports the notion that the PD should be revised to avoid a definition that limits customer access to FSCs by precluding upgrades to certain portions of the distribution grid. As AEU writes, “there is record to support including the secondary distribution system and potential benefit to doing so.”<sup>1</sup> Enphase Energy concurs, noting, “residential customers receive single-phase service, and given that residential energization projects typically pose the greatest constraint and upgrade risk on secondary distribution infrastructure such as service drops or service transformers,” which addresses the importance of a PD that provides a standard offer that can be accessed by all facility types.<sup>2</sup> Anything upstream of the customer can lead to delays if an upgrade is needed, which applicants may seek to avoid if such an alternative exists. With increasing numbers of customers requesting increased capacity to enable fuel switching and beneficial electrification, there will be increased demand for work crews to complete upgrades across the distribution grid, including at the secondary distribution level (such as service transformers). Although secondary distribution system upgrades are smaller in scope and less costly than upstream upgrades, a significant delay can still be a project bottleneck. A speedy energization can be the difference between a business staying on schedule or being unable to function at optimal conditions (or at all). Therefore, the proposed revision, “Upstream Capacity is capacity provided by an IOU's substations and both polyphase and single phase distribution circuits, including associated regulation and protective devices,” should be adopted in the PD.<sup>3</sup>

#### **B. CALSTART**

Clean Coalition strongly supports several CALSTART’s recommendations, especially requiring utilities to explain in implementation Advice Letters detailing how a customer can access a Limited Load Profile (“LLP”) without taking the action to submit a full application for service. For both the benefit of the utility—e.g., conserving resources—and the customer, it is

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<sup>1</sup> AEU Opening Comments on PD, at p. 1.

<sup>2</sup> Enphase Energy Opening Comments on PD, at p. 5.

<sup>3</sup> *Ibid*, at p. 6.

pragmatic to ensure that an interested customer should be able to evaluate the viability of a FSC prior in advance, rather than submitting a half-baked application purely to understand the full range of available options.

Clean Coalition also supports setting timelines for the utility to respond to a customer application for service, including the recommendation of a 5-day average and a 10-day maximum timeline and the development of a Rule 15/16 Unit Cost Guide to provide customers with a greater degree of cost certainty prior to embarking on the process of applying. In the case of all three recommendations, having educated customers will increase the viability of applications, making the process more efficient for utility engineers responsible for evaluating the applications and avoiding a high volume of withdrawn applications.

## **C. IREC**

### **1. Treatment of On-Site Photovoltaics**

With almost two million solar projects deployed in California, there is bound to be some overlap between customers that have on-site photovoltaics and are interested in a FSC. For facilities seeking additional capacity, behind-the-meter deployments are a good way to reduce the amount of grid energy needed. IREC correctly asks the Commission to modify the PD to require the IOUs to include information that explains how on-site PV will be incorporated into engineering reviews.<sup>4</sup> Clean Coalition supports requiring the utility Advice Letters to include information on sites with solar seeking a FSC.

### **2. Emergency Rating Limits**

Clean Coalition agrees with IREC that restricting customers without certified PCS could have a significant impact on a LLP and there is not sufficient evidence on the record to merit requiring these customers to stay withing emergency capacity ratings. For these customers, a LLP could actually result in more significant constraints, rather than unlocking additional capacity. The Commission should solicit information about existing emergency ratings for utility equipment and review PG&E's existing LLLs.

### **3. The PD should require customer benefits rather than ratepayer benefits**

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<sup>4</sup> IREC Opening Comments on PD, at p. 13.

Both IREC and CALSTART advocate that the PD should not mandate ratepayer benefits from each FSC, but customer benefits.<sup>5</sup> The focus of a FSC is a faster energization in an instance where the scope or waiting time for a traditional upgrade causes undue burden. FSCs primarily benefits the customer by ensuring that waiting for additional capacity does not become an inhibitor of progress. The issue of slow customer energizations causing economic issues was the reason that AB 50 and SB 410 were passed, and the reason FSCs should be viewed as customer-friendly solutions. As IREC notes, “the Commission should not give the utilities discretion to not offer LLPs to customers based on individual determinations of ratepayer benefit, especially when it is unclear how those benefits would be determined. Instead, the Commission should clarify that FSCs must be made available to all customers who need them to temporarily avoid upstream capacity constraints.”<sup>6</sup> Clean Coalition supports amending the PD to focus on customer benefit rather than ratepayer benefits. As a bridging solution, FSCs are meant to support the customer experience, rather than primarily as a strategy to yield long-term ratepayer benefits.

#### IV. CONCLUSION

The Clean Coalition appreciates the opportunity to submit these reply comments on the PD. We urge the Commission to revise the definition of “upstream capacity”, require the utility to demonstrate how limited load profiles can be determined prior to submitting an application, mandate the creation of a Unit Cost Guide, impose reasonable timelines for responding to applicants and require customer benefits not ratepayer benefits.

Sincerely,

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<sup>5</sup> CALSTART Opening Comments on PD, at p. 2, and IREC Opening Comments on PD, at p. 11-12.

<sup>6</sup> *Ibid*, at p. 11.

Dated: January 23, 2026