

March 3, 2026
Energy Division
Tariff Unit
California Public Utilities Commission
505 Van Ness Avenue, Room 4004
San Francisco, CA 94102

Re: Clean Coalition Comments on Draft Resolution E-5440 Pacific Gas and Electric, Southern California Edison, and San Diego Gas and Electric Remediation Plans for Integration Capacity Analysis.

Dear Energy Division Tariff Unit,

Introduction

Pursuant to Rule 14.5 of the Rules of Practice and procedure of the California Public Utilities Commission (“the Commission”), Clean Coalition respectfully submits these comments draft resolution, issued February 11, 2026.

The draft resolution takes important steps toward improving the transparency and usability of ICA, including clarifying terminology, expanding reporting requirements, and reaffirming the need for timely updates. However, the issues addressed herein—ICA alignment, discordance thresholds, and monthly refresh compliance—share a common theme: reporting and clarification alone are insufficient without clearly defined performance standards and accountability mechanisms.

After more than a decade of ICA development and refinement, incremental progress is no longer adequate. Electrification of buildings and transportation depends on timely, reliable, and decision-grade hosting capacity data. Continued delays in addressing known Load ICA alignment issues do not merely postpone technical refinement — they risk slowing project development and undermining California’s clean energy and decarbonization objectives. The Commission’s direction in this resolution should therefore ensure that remediation efforts produce measurable improvement within a defined timeframe, rather than extending the timeline for structural fixes.

Background

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.

Discussion

1. Strengthening Enforcement of the Monthly ICA Refresh Requirement

The draft resolution correctly affirms the interpretation advanced by IREC and PAO that D.17-09-

026 requires monthly updates to ICA results for changed circuits.¹ However, the subsequent statement that the IOUs should “strive” to update all triggered circuits every month introduces ambiguity into what is otherwise a clear obligation. The term “strive” does not define the conditions under which failure to complete a monthly refresh would be deemed reasonable or non-compliant, making it difficult to assess performance against the Commission’s own requirement.

While reporting trigger dates and refresh metrics is an important step, transparency alone does not ensure compliance. Without defined exceptions, performance thresholds, or consequences for persistent delay, the monthly update requirement risks becoming aspirational rather than enforceable. Given that ICA refresh cadence has been an identified issue for nearly a decade, and that utilities have had substantial time to address computing, staffing, and process limitations, the resolution should provide clearer standards for acceptable delay and establish an enforcement pathway for sustained non-compliance.

Specifically, the Commission should replace “strive” with language that maintains the mandatory nature of the monthly requirement, while clearly identifying limited and objectively verifiable circumstances under which delayed refreshes are permissible. Doing so would ensure that ICA users receive timely, reliable data and that the Commission’s directives are implemented as intended.

While the Commission may be reluctant to impose penalties at this stage, the absence of a defined enforcement mechanism risks perpetuating a cycle in which reporting substitutes for compliance. The monthly ICA refresh requirement has existed in some form for nearly a decade, yet persistent delays remain. Clear compliance metrics are necessary, but metrics alone do not ensure performance. **In other regulatory contexts, Commission directives are accompanied by consequences for sustained non-compliance; ICA refresh obligations should be no different.** Without an enforcement backstop—whether through automatic escalation, mandatory corrective filings, or financial penalties triggered by persistent failure to meet defined refresh thresholds—the monthly update requirement risks becoming effectively aspirational. Establishing a conditional penalty framework would not be punitive; rather, it would reinforce the seriousness of the Commission’s mandate and provide a concrete incentive to prioritize timely ICA updates. After more than ten years of identified refresh challenges, continued flexibility without accountability is unlikely to produce materially different results.

2. The section “PG&E and SCE ICA Accuracy and Usability” does not provide a clear and measurable standard, nor are the proposed definitions practical.

The draft resolution notes, “A tool that is accurate according to its methodology but misaligned with real-world interconnection results has limited usefulness.”² However, the proposed definitions risk reinforcing precisely that outcome. The term “ICA accuracy” defines accuracy as methodological compliance rather than empirical correctness, conflating model execution with predictive performance. True accuracy should refer to how closely ICA outputs align with observed system conditions and post-interconnection results. Methodological adherence and empirical validation are distinct concepts and should be evaluated separately. Referring to methodological compliance as “accuracy” risks implying that ICA outputs are empirically correct, rather than simply consistent with prescribed modeling steps. For example, Southern California

¹ Draft Resolution E-5440, at p. 14

² *Ibid*, at p. 16.

Edison (“SCE”) may be following the Load ICA methodology as approved, yet the prevalence of circuits reported with zero available capacity suggests a meaningful divergence between model outputs and real-world grid capability.

More importantly, tracking “ICA accuracy” as defined in the draft resolution would primarily measure whether utilities are following prescribed modeling steps—not whether ICA is producing decision-grade results. If the Commission determines only that the model is conservative, without addressing underlying alignment issues, corrective action may be delayed for years. Given California’s electrification and clean energy timelines, ICA must provide actionable data that reflects how the grid actually operates. After more than a decade of investment, the focus should shift from verifying methodological compliance to ensuring empirical performance and alignment.

3. Discordance – The Commission should define performance benchmarks or acceptable tolerance thresholds

We appreciate the Commission’s explicit statement that “An ICA that cannot provide meaningful and usable results is unacceptable, and the tool’s usability is directly tied to its ICA alignment.”³ This establishes a clear objective for ICA remediation. However, requiring tracking and reporting of discordance, without defining performance benchmarks or acceptable tolerance thresholds, risks prolonging the remediation process rather than accelerating corrective action.

Reporting is a necessary first step. But without a defined standard against which discordance will be evaluated, it remains unclear how the Commission will determine whether ICA performance is improving or whether intervention is warranted and reduces incentives for proactive remediation in the absence of clearly defined performance benchmarks. For example:

- What level of aggregate discordance is acceptable?
- Is persistent, directional bias (e.g., systematic underestimation) tolerable?
- At what point does discordance undermine ICA’s usability as a siting and planning tool?

If 80–90% of projects pass engineering review above ICA values, engineers routinely unlock additional hosting capacity through standard practices, and ICA values rarely reflect actual constraints, then ICA is functionally over-conservative. In such a case, discordance would not merely be expected variance — it would represent structural misalignment. Without quantitative performance benchmarks or directional standards, the Commission risks normalizing systematic underestimation of hosting capacity under the label of expected discordance. Accordingly, the Commission should adopt quantitative alignment thresholds and a defined corrective framework to ensure that ICA does not remain structurally over-conservative under the guise of expected discordance.

Conclusion

The Clean Coalition respectfully submits these comments and reiterates that ICA exists to enable DER deployment by providing actionable hosting capacity data. Electrification and achievement of the state’s climate and clean energy objectives depend on timely, reliable, and decision-grade hosting capacity information. Continued delay in resolving known ICA misalignment issues risks slowing project development and undermining those objectives. We urge the Commission to incorporate the proposed recommendations before adopting a final resolution.

³ *Ibid*, at p. 17.

/s/ BEN SCHWARTZ

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