

**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 ASSIGNED COMMISSIONER'S
AMENDED PHASE 2 SCOPING MEMO AND RULING**

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I. INTRODUCTION

Pursuant to Rule 6.2 of the Rules of Practice and Procedure of the California Public Utilities Commission (“the Commission”), Clean Coalition submits comments on the *Assigned Commissioner’s Amended Phase 2 Scoping Memo and Ruling*, issued on March 19, 2026, and the *Email Ruling Granting Party Status and Extending Comment Deadline*, issued on April 10, 2026.

Clean Coalition’s comments focus on ensuring that the adopted energization timelines result in actual utility performance, not merely additional planning, reporting, or spending. The Commission should enforce the timelines as meaningful standards, require remedial action when utilities fail to meet them or fail to keep pace with new demand, and use Section 935(a) reporting and auditor review to identify the staffing, data-system, business-process, and cost-control deficiencies that contribute to recurring energization delays. The Commission should:

- Enforce adopted energization timelines and require remedial action when utilities fail to meet them or fail to keep pace with demand.
- Require an auditor to report on the root causes of energization delays, including data-system capability, analytical staffing, and long-term cost discipline.

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 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. Energization Timeline Compliance, Remedial Actions, and Enforcement Policy

Clean Coalition supports strong enforcement of the energization timelines adopted by the Commission. The adopted timelines should not function merely as planning targets or aspirational benchmarks. They should operate as enforceable standards against which utility performance is measured. The purpose of this phase should be to ensure that the timelines adopted in this proceeding translate into actual utility performance.

The Commission should therefore require each investor-owned utility (“IOU”) to demonstrate ongoing compliance with the adopted energization timelines, including both individual project performance and systemwide performance. Compliance should not be measured only by whether the utility reduces an existing backlog over a short period of time. The Commission should also evaluate whether the utility is keeping pace with new energization applications. If new applications continue to accumulate faster than the utility can complete energization work, then the utility is not meeting California’s electrification needs, even if it is making progress on a historical backlog.

Accordingly, the Commission should find that remedial action is appropriate when a utility:

- Fails to meet adopted energization timelines on a consistent basis
- Fails to reduce existing backlogs while keeping pace with new applications
- Fails to implement necessary hiring, training, data, or business-process improvements
- Fails to act on auditor recommendations
- Or otherwise demonstrates that its existing approach is insufficient to provide timely energization service.

This approach preserves the proper sequence. The Commission should first establish clear compliance expectations and enforce the adopted timelines. Remedial action should then follow where the record shows that a utility is not meeting those expectations or is not taking the actions necessary to prevent recurring delays.

This framework is important because energization delays are not merely a customer-service problem. They directly affect housing construction, transportation electrification, building electrification, DER deployments, and California’s ability to meet its climate and reliability

goals. Allowing utilities to treat adopted timelines as soft targets would undermine the purpose of this proceeding and weaken the Legislature’s direction to accelerate energization.

B. Should the Commission take any steps to implement the reporting requirements set by Section 935(a)?

Yes. The Commission should not treat energization delays as a problem that can be solved solely through additional spending or temporary contractor labor. That approach may reduce near-term backlogs, but it does not ensure that the utilities have built the durable internal capabilities needed to meet California’s electrification needs over time.

Clean Coalition therefore recommends that the Commission require the SB 254 auditor, in coordination with any SB 410 auditor, to evaluate whether each IOU has sufficient internal data systems, analytical tools, automation capability, computing resources, and dedicated data-analysis staff to meet adopted energization targets. This review should include, at minimum, whether the utility has sufficient staffing and tools to: process and triage energization applications, identify common causes of delay, forecast locational load growth and upstream capacity needs, maintain accurate and actionable Load ICA or equivalent capacity data, distinguish projects that require traditional upgrades from projects that can be served through flexible service arrangements or operational solutions, and produce timely, auditable, project-level data for Commission oversight.

This inquiry is directly tied to how effectively AB 50/SB 410 remediation plans are being carried out. If an IOU cannot accurately identify where energization constraints are located, why projects are delayed, which upgrades are actually required, and which lower-cost alternatives could avoid or defer traditional infrastructure, the IOU cannot reliably meet energization targets at scale. A backlog-reduction plan that relies primarily on more capital spending, more contractors, or more manual processing may temporarily increase throughput, but it will not necessarily create a durable energization process capable of supporting widespread electrification at reasonable cost.

The Commission should also require the auditor to evaluate whether each IOU is taking all reasonable actions to reduce ratepayer costs over the long term while meeting energization timelines. The proper standard should not be “speed at any cost.” Rather, the Commission should require each utility to demonstrate that its energization strategy achieves timely energization at the lowest reasonable long-term cost consistent with safety and reliability. This should include

review of whether the utility is relying excessively on premium-priced contractors, whether contractor use is temporary, competitively priced, and tied to clear backlog-reduction milestones, whether the utility is building internal workforce capacity sufficient to prevent recurring backlogs; and whether the utility is using lower-cost alternatives—including better data, process automation, flexible service connections, grid-enhancing technologies, targeted upgrades, and improved queue management—before defaulting to expensive traditional infrastructure solutions.

This recommendation is consistent with Clean Coalition’s prior comments in this proceeding. Clean Coalition has previously urged the Commission to require reporting on current and required staffing levels necessary to meet energization targets, because Public Utilities Code Section 935(a) requires attention to the utility workforce needed to support timely energization. Clean Coalition has also warned that approving short-term, contractor-heavy backlog-reduction strategies without guardrails can reward years of inaction, socialize avoidable cost premiums, and leave ratepayers funding the most expensive pathway after the money has already been spent.

Accordingly, the Commission should order the following remedial actions:

1. Require the SB 254 auditor to evaluate whether each IOU has sufficient data systems, analytical tools, automation capability, computing resources, and dedicated data-analysis staff to meet energization targets and prevent future backlogs.
2. Require the auditor to evaluate whether each IOU’s energization strategy minimizes long-term ratepayer costs while meeting safety, reliability, and timeline requirements.
3. Require each IOU to submit a corrective action plan if the auditor finds deficiencies in data systems, analytical staffing, internal workforce planning, queue management, or cost-control practices.
4. Require each corrective action plan to include measurable milestones, including staffing levels, analytical capability improvements, process-automation steps, project-triage improvements, unit-cost tracking, and reductions in avoidable contractor reliance.
5. Require quarterly reporting on the relationship between energization spending and outcomes, including cost per completed energization, staffing mix, contractor share, average and maximum timeline performance, number of projects requiring upstream

upgrades, number of projects served through lower-cost alternatives, and the causes of projects exceeding adopted timelines.

Without these requirements, the Commission risks addressing the symptom of the current energization backlog without correcting the structural causes. The result would be a cycle in which IOUs underinvest in internal planning, data, and workforce capabilities; backlogs reappear; utilities seek emergency or near-emergency cost recovery; and ratepayers are left to pay for the most expensive short-term solution. The Commission should use this phase of the proceeding to prevent that outcome.

IV. CONCLUSION

The Clean Coalition appreciates the opportunity to submit these comments. The Commission should ensure that adopted energization timelines are treated as enforceable standards, not aspirational benchmarks. When utilities fail to meet those timelines, fail to keep pace with new applications, or fail to implement necessary staffing, data-system, business-process, or cost-control improvements, the Commission should require targeted remedial action. The Commission should also implement Section 935(a) reporting and auditor review requirements in a manner that identifies the root causes of energization delays and ensures that utilities achieve timely energization at the lowest reasonable long-term cost to ratepayers.

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