

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

Order Instituting Rulemaking to Consider
Distributed Energy Resource Program Cost-
Effectiveness Issues, Data Access and Use, and
Equipment Performance Standards.

Rulemaking 22-11-013
(Filed November 17, 2022)

**CLEAN COALITION COMMENTS ON ADMINISTRATIVE LAW JUDGE'S RULING
SEEKING COMMENTS ON DATA WORKING GROUP REPORT**

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I. INTRODUCTION

Pursuant to Rule 6.2 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”) the Clean Coalition respectfully submits these comments on the *Administrative Law Judge’s* (“ALJ”) *Ruling Seeking Comments on Data Working Group (“DWG”) Report*, issued at the Commission on June 12, 2026, and the *ALJ Ruling Extending Time for Party Comments*, issued on June 22, 2026.

The single most important overarching takeaway from the DWG Report is that the Commission should treat distributed energy resources (“DER”) data access as grid infrastructure that is critical to the successful operation of the grid of the future, not as an administrative convenience. The Report confirms that DER deployment, electrification, load flexibility, demand forecasting, local/tribal government planning, and DER market integration all depend on access to accurate, standardized, usable data. The challenges faced by Community Choice Aggregators (“CCAs”) illustrate the point: when timely customer load data remains unavailable, delayed, or controlled through utility-specific systems, CCAs are constrained in their ability to design rates, administer customer programs, forecast demand, and support DER integration. The report also confirms that current data access is fragmented across tools, entities, formats, privacy rules, and utility-controlled platforms.

Consistent with that overarching principle, the Commission should prioritize the following actions:

- Treat the DWG Report as an implementation roadmap, not merely a record of stakeholder discussion.
- Make DER data actionable, not merely available.

- Replace the current aggregation framework with a 4/50 standard that better balances privacy and public-interest data access.
- Apply aggregation rules consistently across utilities.
- Develop a Microgrid Data Clearinghouse as a targeted, high-value data access solution.
- Support the Report’s recommendations that improve DER siting, privacy, program information, and interagency coordination.

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

1. **Treat the DWG Report as an implementation roadmap, not merely a record of stakeholder discussion**

The Commission should use the DWG Report as a policy document that identifies which data access reforms are ready for near-term action, which require further development in this proceeding, and which should be coordinated with other Commission or CEC processes. To make the Report actionable, the Commission should direct the development of a clear implementation timeline for each recommendation, including the responsible entity, expected forum, dependencies, and whether additional record development is needed. The Report should also identify “low-hanging fruit” recommendations that can be adopted quickly—such as

clarifying aggregation rules, improving EDRP access and reporting, standardizing data formats, expanding access for local and Tribal governments, and improving the usability of existing public DER datasets—along with timelines.

2. Make DER data actionable, not merely available

The Commission should require that DER-related data be provided in standardized, machine-readable, validated, and timely formats that can actually support planning, procurement, program administration, and operational decision-making. Data access has limited value if stakeholders must spend substantial time cleaning, reconciling, or translating inconsistent datasets before the data can be used. The Commission should therefore support Report recommendations that improve DER siting information, program information, data standardization, data governance, and coordination across utility, CCA, local government, Tribal government, California Energy Commission (“CEC”), and CPUC data systems.

3. Replace the current aggregation framework with a 4/50 standard that better balances privacy and public-interest data access

The Commission should adopt a less restrictive aggregation standard, such as a 4/50 rule, as a critical near-term step to make DER, electrification, and resilience planning data meaningfully usable while continuing to protect customer privacy. Granular load and customer data will become increasingly important as local governments, Tribal governments, CCAs, developers, and researchers work to design neighborhood electrification strategies, load flexibility plans, local clean energy deployments, economic development initiatives, Community Microgrids, and other resilience solutions. The current 15/15/100 framework can prevent access to the use cases identified in the DWG Report, including the very data needed to identify where DER can reduce costs, avoid infrastructure, and support targeted investment, particularly in smaller, rural, disadvantaged, or geographically constrained communities. A 4/50 rule would continue to protect customer confidentiality while allowing local governments, Tribal governments, CCAs, researchers, and DER developers to access the level of granular data needed to make targeted investments and avoid unnecessary infrastructure costs.

4. Apply aggregation rules consistently across utilities

The Commission should clarify how any aggregation standard is applied, including whether the threshold is measured based on monthly or annual load, because inconsistent utility implementation can materially affect whether useful data is released. At a recent quarterly ICA workshop (R. 21-06-017, “High DER”), PG&E explained that it applies the 15/15 rule based on total monthly load, while SCE and SDG&E could not confirm that they apply the rule in the same manner. A privacy rule that materially affects DER planning, public data access, and local government decision-making should not vary by utility interpretation. Privacy protections should be uniform, transparent, and predictable, not dependent on utility-specific interpretation. The Commission should therefore replace the current overly restrictive standard with a consistent statewide aggregation framework that better balances customer confidentiality with the public interest in actionable energy data.

5. Develop a Microgrid Data Clearinghouse as a targeted, high-value data access solution

The Commission should support the creation of a privacy-protective Microgrid Data Clearinghouse that collects, organizes, and makes available anonymized information from behind-the-meter microgrids and Community Microgrids across utility service territories. Microgrids necessarily involve site-specific design considerations, including square footage, load profile, critical load needs, climate zone, resilience objectives, rate schedule, interconnection configuration, and available DER technologies. However, the process of developing microgrids should become far more replicable than it is today. Many lessons learned during project design, interconnection, study processes, utility coordination, and post-operational performance are not broadly shared because of customer privacy concerns, fragmented data access, and the fact that customers have little incentive to compile project data once a system is already operational. As a result, developers, local governments, Tribal governments, utilities, CCAs, researchers, and customers are often forced to recreate assumptions and resolve avoidable issues on a project-by-project basis, including across different utility service territories.

A Microgrid Data Clearinghouse would help solve that problem while preserving customer confidentiality. The Clearinghouse could include an anonymized project ID, load data, system size, square footage, climate zone, resilience duration or resilience capability, rate schedule, interconnection data, single-line diagram characteristics where appropriate, and other non-

customer-identifying project characteristics. The purpose would not be to disclose customer-specific information, but to create a usable dataset that allows stakeholders to understand what types of microgrid configurations have worked, what interconnection issues arose, what level of resilience was achieved, and what assumptions should inform future projects. If additional privacy protections are needed, the Commission could require coarsening of data by microgrid size, utility service territory, or climate zone; tiered access that makes summary data publicly available while providing more granular data only to qualified researchers or developers under data-sharing agreements; and clear rules excluding specific addresses or other personally identifying information.

The Commission should also consider a simple consent-based pathway for populating the Clearinghouse, such as an opt-in mechanism when a customer authorizes Green Book or similar data sharing during the early stages of project development, paired with a clear explanation of what information would be shared and how it would be anonymized. Customers should also retain the ability to opt out later. This approach would keep the process understandable and non-onerous while creating a valuable dataset that can reduce development costs, improve system sizing, streamline interconnection, support more accurate resilience planning, and make successful Community Microgrid models easier to replicate. A Microgrid Data Clearinghouse would therefore provide a concrete, limited, and cost-effective example of how the Commission can move from general DER data access principles toward an actionable data tool with direct ratepayer, resilience, and clean-energy deployment benefits. This subject was included in the DWG Report but should be elevated by the Commission as a low-hanging fruit solution that can be pursued in the near future.

6. Support the Report's recommendations that improve DER siting, privacy, program information, and interagency coordination

The Commission should move forward with recommendations that make DER adoption, program participation, siting opportunities, and grid-relevant data easier to understand and use. This includes improving public DER datasets, clarifying privacy rules, expanding access for local and Tribal governments, improving customer program information, and coordinating with the CEC to avoid duplicative or conflicting data governance structures.

IV. CONCLUSION

The Clean Coalition respectfully submits these comments and urges the Commission to treat the DWG Report as an implementation roadmap for making DER data access a core component of grid modernization. The Report should identify clear timelines, responsible entities, and low-hanging-fruit reforms, including actionable data standards, improved local and Tribal government access, adoption of a 4/50 aggregation standard, consistent utility application of privacy rules, and development of targeted tools such as a Microgrid Data Clearinghouse. These steps are necessary to ensure that DER data can support electrification, load flexibility, local clean energy deployment, resilience, and the cost-effective operation of the grid of the future.

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