

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

Order Instituting Rulemaking to Modernize the
Electric Grid for a High Distributed Energy
Resources Future.

Rulemaking 21-06-017
Filed June 24, 2021

**CLEAN COALITION COMMENTS ON PROPOSED DECISION REVISING THE
INTEGRATION CAPACITY ANALYSIS WORKSHOP SCHEDULE AND ORDERING
GRID MODERNIZATION PROGRESS REPORTS**

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August 17, 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 respectfully submits these comments on the *Proposed Decision* (“PD”) *Revising the Integration Capacity Analysis (“ICA”) Workshop Schedule and Ordering Grid Modernization Progress Reports*, issued by the Commission on July 28, 2026. Clean Coalition recommends that the Commission retain the existing quarterly ICA workshop cadence.

The PD incorrectly characterizes the proceeding record by identifying only Cal Advocates and 350 Bay Area as opposing a reduction in workshop frequency. Clean Coalition expressly supported Cal Advocates' recommendation that the frequency of ICA workshops should not be reduced.¹ Accordingly, the record did not reflect stakeholder consensus in favor of reducing the workshop cadence. The PD should be corrected to accurately reflect the record.

More substantively, the PD does not provide an adequate basis for reducing the workshop cadence. It concludes that fewer workshops would allow the investor-owned utilities (“IOUs”) to provide “more meaningful updates,” focus on implementing remediation plans in response to industry developments, and better align workshops with biannual ICA reports.² Yet the PD identifies no evidence that quarterly workshops materially interfere with remediation work, require significant utility resources, or delay implementation. Nor does it identify industry developments that change so substantially over a three-month period that quarterly discussion becomes inefficient or counterproductive.

¹ R. 21-06-017 Clean Coalition Reply Comments on Assigned Commissioner’s Ruling on Track 1 and Track 2 Distributed Energy Resources (“DER”) Orchestration, on April 30, 2026, at p. 1.

² PD, at pp. 4-5.

At the same time, the record identifies a clear downside to reducing the cadence. Cal Advocates emphasized that quarterly workshops promote transparency, accountability, and timely correction of ICA problems, while 350 Bay Area warned that delays could compound under a biannual schedule. Clean Coalition shares those concerns. ICA issues often require follow-up over multiple meetings, and if an issue remains unresolved at the next biannual workshop, nearly a full year may pass before stakeholders can again address it in a public forum.

The Commission should not weaken an existing transparency and accountability mechanism based on speculative benefits that are unsupported by the record. The quarterly cadence should be retained unless and until there is evidence demonstrating that reducing workshop frequency would materially improve ICA remediation without sacrificing timely public oversight.

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. The findings in the PD related to ICA workshop frequency are unsupported by the proceeding record.

The PD states that reducing workshop frequency would allow the IOUs to provide “more meaningful updates” and focus on implementing remediation plans, but identifies no record evidence demonstrating that quarterly workshops materially interfere with that work. The PD does not identify the resources required to prepare for a workshop, quantify any burden associated with the quarterly cadence, or point to an instance in which preparation for a

workshop delayed implementation of an ICA remediation measure. Nor does the PD explain why an additional three months between workshops would meaningfully accelerate remediation.

The reference to “industry developments” is similarly unsupported. The PD does not identify any category of industry development that changes so substantially over a three-month period that quarterly discussion would become inefficient or materially less useful. To the contrary, if an emerging development is relevant to ICA implementation, discussing it three months earlier may assist stakeholders and the IOUs in identifying implications and potential solutions sooner. Nothing in the PD demonstrates that delaying such discussion until a biannual workshop would improve implementation.

Instead, the record summarized in the PD principally supports the more limited proposition that biannual workshops would align with the biannual ICA reporting schedule. Alignment of schedules is not itself evidence that reducing public workshops will improve ICA implementation. Notably, the PD requires the IOUs to provide evidence of burden or implementation constraints before seeking future changes to the workshop cadence, yet identifies no comparable evidence supporting the immediate reduction from quarterly to biannual workshops. The Commission should not reduce an existing transparency and accountability mechanism based on an unsupported assumption that fewer workshops will produce more meaningful progress.

B. Reducing cadence creates a concrete accountability cost because unresolved issues can go many additional months without public follow-up

The PD concludes that a biannual workshop cadence would better align with the existing biannual ICA reports and allow the investor-owned utilities (“IOUs”) to provide more meaningful updates. However, alignment with the reporting schedule overlooks a separate and important purpose of the workshops: providing a regular public forum in which stakeholders can raise ICA issues, evaluate proposed solutions, and track utility progress toward implementation.

Quarterly workshops are particularly important because resolution of ICA issues frequently occurs over multiple meetings. An IOU may identify a proposed solution or commit to providing additional information at one workshop but not have the work completed by the following workshop. Under the existing quarterly cadence, stakeholders can revisit the issue several months later. Under the proposed biannual cadence, if the issue remains unresolved at the next

workshop, nearly a full year may pass before it can again be discussed in this public forum. This would allow delays to compound and reduce accountability for timely implementation.

Clean Coalition has previously emphasized that ICA improvements require not merely identification and reporting of problems, but timely implementation of solutions through a transparent process in which stakeholders can participate. The Commission adopted quarterly workshops precisely while substantial ICA remediation efforts remain underway. Reducing that cadence before those issues have been resolved is premature.

Nor do the biennial Grid Modernization Progress Reports adopted by the PD substitute for quarterly ICA workshops. Those reports address broad grid modernization activities over a two-year period, whereas ICA workshops provide an iterative public forum for identifying current ICA issues and tracking their remediation.

The Commission should therefore modify the PD to retain quarterly ICA workshops. The biannual reporting schedule does not require a corresponding reduction in workshops; workshops held between reports can instead provide concise updates on outstanding remediation items, new issues, and progress on commitments made during prior workshops.

IV. CONCLUSION

Clean Coalition appreciates the opportunity to submit comments on the PD. We urge the Commission to correct the PD's characterization of the proceeding record and retain the existing quarterly ICA workshop cadence unless and until record evidence demonstrates that reducing workshop frequency would materially improve ICA remediation without sacrificing transparency, accountability, or timely public oversight.

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Appendix A: Recommended Modifications

Delete: ~~1. A biannual ICA workshop cadence would better align with the release of the biannual ICA report.~~

Replace with: Quarterly ICA workshops provide a regular public forum for stakeholders to identify ICA issues and monitor the implementation of remediation measures between biannual reports.

Delete: ~~2. Allowing the IOUs to suggest modifications to the ICA workshop cadence would help align the workshops with industry developments.~~

Replace with: IOU modifications to the ICA workshop cadence should not be adopted unless there is clear evidence that the existing quarterly schedule is not aligned with industry developments.