**BEFORE THE PUBLIC UTILITIES COMMISSION**

**OF THE**

**STATE OF CALIFORNIA**

**FILED**
10/15/26
04:59 PM
R2509004

| **Order Instituting Rulemaking to Enhance Demand Response in California.** | **Rulemaking 25-09-004**<br><br>**(Filed September 18, 2025)** |
|---|---|

# CALIFORNIA LARGE ENERGY CONSUMERS ASSOCIATION OPENING COMMENTS ON ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENTS ON PROPOSED DECISION APPROVING TWO-YEAR BRIDGE FUNDING FOR DEMAND RESPONSE PROGRAMS

Sam Harper
Harper Advisory LLC
9002 Six Pines Drive
Shenandoah, TX 77380
(214) 463-9423
Sam@harper.energy

Consultant to the California Large Energy Consumers Association

Nora Sheriff
Timothy Lee
Buchalter LLP
425 Market Street, 29th Floor
San Francisco, CA 94105-2491
415.227.3551 office
415.227.0770 fax
nsheriff@buchalter.com
tlee@buchalter.com

Counsel for the California Large Energy Consumers Association

October 15, 2026

**BEFORE THE PUBLIC UTILITIES COMMISSION**

**OF THE**

**STATE OF CALIFORNIA**

| | |
|---|---|
| **Order Instituting Rulemaking to Enhance Demand Response in California.** | **Rulemaking 25-09-004**<br><br>**(Filed September 18, 2025)** |

# CALIFORNIA LARGE ENERGY CONSUMERS ASSOCIATION OPENING COMMENTS ON ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENTS ON PROPOSED DECISION APPROVING TWO-YEAR BRIDGE FUNDING FOR DEMAND RESPONSE PROGRAMS

The California Large Energy Consumers Association (CLECA)[1] submits these comments pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission).

## I. INTRODUCTION

CLECA members have participated in Demand Response (DR) programs for many years and provide a substantial share of Base Interruptible Program (BIP) capacity. Time and again, CLECA members have demonstrated reliable and dependable curtailment performance in these DR programs, providing meaningful load reductions during periods of extreme grid stress. As ratepayers, CLECA members also benefit from the increased reliability and reduced costs that

[1] CLECA member companies produce goods essential for daily life, including critical infrastructure, oxygen for hospitals, and food distribution. CLECA members represent the steel, cement, industrial and medical gas, glass, beverage, minerals processing, and pipeline transportation industries. Their aggregate electric demand is about 500 Megawatts, which is equivalent to the electricity consumption of approximately 470,000 average California households. CLECA members are large, high load factor and high voltage industrial electric customers in California for whom the price of electricity is essential to their competitiveness and for whom the reliability of electricity service is critically important. For both reasons, CLECA member companies have participated for decades in the Base Interruptible Program (BIP), providing reliability demand response to the grid in times of need. (For more information, please go to CLECA.org).

result from DR programs. Thus, an available and maximally effective DR program is important for CLECA.

## II. COMMENTS

### 1. CLECA SUPPORTS THE DECISION APPROVING THE TWO-YEAR BRIDGE FUNDING PROPOSAL FOR DEMAND RESPONSE PROGRAMS

Given the time horizon of the next program cycle and the potential revisions in the scope of this rulemaking, CLECA agrees with the proposed decision to authorize two years of bridge funding for 2028-2029 DR programs.[2] This funding will maintain DR program continuity for existing DR programs and provide certainty to program participants, including CLECA members, and avoid unnecessary disruption while the Commission considers remaining policy issues and potential reforms in this proceeding.

Additionally, CLECA agrees with the extended DR application deadline for Investor-Owned Utilities (IOUs) of November 1, 2028.[3] This extension provides IOUs sufficient time to incorporate this rulemaking into their applications.

[2] *Decision Approving Two-Year Bridge Funding for Demand Response programs,* Rulemaking 25-09-004 at 2.
[3] *Id.*

## III. CONCLUSION

The California Large Energy Consumers Association appreciates the opportunity to provide these comments.

Respectfully submitted,

BUCHALTER LLP

By:



Nora Sheriff

Counsel for the California Large Energy Consumers Association

CLECA CALIFORNIA LARGE ENERGY CONSUMERS ASSOCIATION

October 15, 2026