

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE

STATE OF CALIFORNIA



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Order Instituting Rulemaking on California
Advanced Electric Rate Design.

Rulemaking 26-04-009

(Filed April 09, 2026)

**CALIFORNIA LARGE ENERGY CONSUMERS ASSOCIATION
REPLY COMMENTS ON ORDER INSTITUTING RULEMAKING
ON CALIFORNIA ADVANCED ELECTRIC RATE DESIGN**

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The California Large Energy Consumers Association ([CLECA](#))¹ submits these Reply Comments on the California Public Utilities Commission's (Commission) April 10, 2026, *Order Instituting Rulemaking On California Advanced Electric Rate Design* (Rulemaking)² pursuant to the directive and schedule set in the Rulemaking.

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, cold storage, 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](#)).

² CPUC, *Order Instituting Rulemaking On California Advanced Electric Rate Design*, R.26-04-009, (filed April 10, 2026) (Rulemaking), available at: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M604/K677/604677976.PDF>

I. INTRODUCTION

The Opening Comments filed on May 11, 2026, confirm broad convergence on core issues central to this proceeding. The record establishes that:

- Assembly Bill (AB) 2109 implementation is urgent and should proceed on an expedited parallel track;
- marginal cost methodology and cost-of-service issues are already being litigated in the General Rate Case (GRC) Phase 2 proceedings and should not be relitigated here in parallel;
- data center rate design should be narrowly tailored to the specific cost and reliability risks of computational loads, grounded in cost causation, and non-punitive; and
- California's current rate design discourages the industrial decarbonization investments the state needs to achieve its climate goals.

Pub. Util. Code §§ 451 and 364 require that utility service be adequate, efficient, just, and reasonable.³ Rate design decisions here will directly affect whether CLECA's members can continue to reliably and economically operate in California while making the capital investments that decarbonization requires.

³ Cal. Pub. Util. Code §§ 451, 364. Section 451 provides: "Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service ... as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public." Section 364 provides: "The standards ... shall provide for high-quality, safe, and reliable service."

II. REPLY COMMENTS

A. AB 2109 Implementation Requires an Expedited Parallel Track

AB 2109 was enacted nearly twenty months ago in September 2024.⁴ The narrow exemption from nonbypassable and departing load charges that the statute requires should be implemented as expeditiously as possible. No party challenged the merits of AB 2109 implementation in Opening Comments; disagreement was limited only to scheduling.

The Natural Resources Defense Council (NRDC) specifically supported full implementation, finding that waste heat recovery systems provide “similar climate benefits to energy efficiency and renewables yet [are] subject to departing load fees which impedes the economics of industrial facilities installing such systems;” NRDC further points out that reforming those fees “would put waste heat recovery on a level playing field with other decarbonization technologies and remove a key barrier to greenhouse gas emission reductions in one of the state’s most carbon-intensive sectors.”⁵ This support confirms that expedited implementation is important not only for industrial customers considering capital investments, but also for advancing the state’s environmental and emissions-reduction objectives.

Southern California Edison (SCE) proposed that AB 2109 be addressed within its proposed initial large-load track “in a smaller, working group process.”⁶ SCE did not request a multi-year deferral. SCE's proposal confirms that the record supports near-term consideration of AB 2109 implementation rather than deferring the issue to a later phase of the proceeding.

⁴ AB 2109 (Carrillo), 2024 Cal. Stat. ch. 700, Cal. Pub. Util. Code § 451.7(a)(3).

⁵ *Opening Comments of Natural Resources Defense Council on Order Instituting Rulemaking on California Advanced Electric Rate Design*, R.26-04-009 (May 11, 2026) (NRDC Opening Comments) at p. 14.

⁶ *Opening Comments of Southern California Edison Company on Order Instituting Rulemaking on California Advanced Electric Rate Design*, R.26-04-009 (May 11, 2026) (SCE Opening Comments) at p. 4.

Pacific Gas & Electric Company (PG&E) proposed a Track 5, with proceedings beginning in 2027 and a decision issued in Q2 2028.⁷ A decision in Q2 2028, followed by implementation, would extend to approximately four years after enactment. Assemblymember Carrillo's April 2025 letter to Commission President Reynolds documented that the delay is already suppressing capital investment decisions that depend on regulatory certainty.⁸ NRDC's statement, that waste heat recovery remains blocked by the same departing load fees AB 2109 was enacted to remove, underscores that each additional year of delay is a year in which those emissions reductions do not occur.

PG&E argued that AB 2109 involves "technical issues and requirements related to IPHR systems, and may involve additional issues like the Commission's prohibited resources policy."⁹ However, the legislation specifically excludes supplemental firing, so prohibited resource policy is not at issue.¹⁰ The two primary implementation questions, the statewide cap and eligibility criteria, are bounded questions that do not depend on the broader rate design and marginal cost issues in this proceeding. Accordingly, an expedited standalone track or a targeted workshop phase involving a limited set of affected parties can proceed in parallel without delaying other tracks.

⁷ *Opening Comments of Pacific Gas and Electric Company on Order Instituting Rulemaking on California Advanced Electric Rate Design*, R.26-04-009 (May 11, 2026) (PG&E Opening Comments) at Appendix E-3.

⁸ Letter from Assemblymember Juan Carrillo to President John Reynolds, re: *Request to Initiate Regulatory Proceedings for AB 2109*, dated April 10, 2025.

⁹ PG&E Opening Comments at Appendix E-2.

¹⁰ AB 2109 (Carrillo), 2024 Cal. Stat. ch. 700, Cal. Pub. Util. Code § 451.7(a)(3).

B. Marginal Cost and GRC Phase 2 Issues Belong in a Later Track

Multiple parties independently concluded that Issues 3.1.b and 3.1.c, whether existing rates accurately reflect cost-of-service and how marginal cost methodologies should be modified, are already being addressed in GRC Phase 2 proceedings and should not be relitigated in this rulemaking on a compressed timeline.

The Utility Reform Network (TURN) provided the clearest statement:

These are potentially large topics that could consume a significant amount of time by parties and crowd out consideration of other rate design topics. Moreover, these topics are already being extensively litigated in Phase 2 General Rate Case proceedings for each of the individual utilities. It is not clear whether the Commission intends to use this rulemaking to supersede the outcomes of those proceedings, many of which are the product of settlement negotiations. TURN cautions the Commission against asking parties to litigate the same issues in multiple parallel proceedings.¹¹

TURN also cited the concrete prior failure of this approach: the Commission previously directed parties to litigate marginal cost issues in a multi-utility proceeding “that ended with no clear direction or resolution of the underlying disputes;” TURN warns the Commission not to repeat an exercise that “will again be inconclusive and result in little or no impact on the actual design of rates.”¹²

Cal Advocates recommends removing Issues 3.1.b and 3.1.c from the scope entirely, finding that consideration of marginal cost methods in this OIR “is duplicative of work currently performed in General Rate Case Phase 2 (GRC 2) applications”; Cal Advocates also notes that

¹¹ *Opening Comments of The Utility Reform Network on Order Instituting Rulemaking on California Advanced Electric Rate Design*, R.26-04-009 (May 11, 2026) (TURN Opening Comments) at p. 1.

¹² TURN Opening Comments at p. 1 (citing D.17-09-035, pp. 34-39).

exclusion “will also allow parties to spend more time considering the other issues in this proceeding that impact rate design for all electric utilities.”¹³ The breadth of stakeholder concern on this point, from TURN, Cal Advocates, San Diego Gas & Electric Company (SDG&E),¹⁴ PG&E,¹⁵ and CLECA, reflects strong consensus that these topics should be treated with caution outside of the GRC Phase 2 litigation and settlement context.

Deferral to a later track with prospective principles that guide future GRC Phase 2 proceedings is warranted here, rather than outright removal of these issues from scope. This approach preserves the integrity of ongoing GRC Phase 2 proceedings while allowing the Commission to provide forward-looking guidance where appropriate.

C. Data Center Rate Design Must Be Narrowly Tailored, Cost-Causation Based, and Non-Punitive

1. Cost Causation Is the Foundation

The Opening Comments reflect a broad consensus that data center rate design should be grounded in cost causation and that any separate treatment must be supported by evidence of distinct, measurable costs. The Data Center Coalition (DCC) stated its governing framework:

Cost causation and nondiscrimination: Large load customers should pay the costs they cause, but should not be singled out for separate or more burdensome treatment based solely on end use or industry label.¹⁶

¹³ *Opening Comments of Public Advocates Office on Order Instituting Rulemaking on California Advanced Electric Rate Design*, R.26-04-009 (May 11, 2026) (Cal Advocates Opening Comments) at p. 8.

¹⁴ *Opening Comments of San Diego Gas & Electric Company on Order Instituting Rulemaking on California Advanced Electric Rate Design*, R.26-04-009 (May 11, 2026) (SDG&E Opening Comments) at p. 10.

¹⁵ PG&E Opening Comments at p. 8.

¹⁶ *Opening Comments of Data Center Coalition on Order Instituting Rulemaking on California Advanced Electric Rate Design*, R.26-04-009 (May 11, 2026) (DCC Opening Comments) at p. 3.

DCC elaborated that the required evidentiary showing must address “how data centers differ from other large load customers with similar load profiles and infrastructure needs” and that “[c]ustomer classification should be based on cost drivers, not industry labels.”¹⁷ DCC applied this principle expressly to other large load customers, stating that the Commission should “avoid end-use-specific assumptions unless the record shows that a customer group imposes distinct costs or provides distinct system benefits that should be reflected in rates.”¹⁸

CLECA and DCC share this cost-causation foundation, which is aligned with long-standing Commission policy and articulated in Pub. Util. Code §§ 451 and 364.¹⁹ However, CLECA accepts that a distinct data center class may be appropriate given the grid reliability risks that the North American Electric Reliability Corporation (NERC) and the California Independent System Operator (CAISO) have independently documented for computational loads.²⁰ Any such classification must be defined by the specific cost drivers and risk profile of hyperscale computational loads, rather than by load size or industry label alone.

2. Properly Designed Large Load Integration Benefits All Ratepayers

SCE stated the affordability case for non-punitive rate design directly, citing Senate Bill (SB) 57’s own legislative findings:

Data center tariffs and service terms that are punitive or misaligned with cost causation principles, such that they discourage data centers from building in California, could thus undermine broader affordability goals. . . . ‘[M]ore efficient use of existing electrical and grid assets and the sharing of fixed energy

¹⁷ DCC Opening Comments at pp. 12-13.

¹⁸ *Id.* at p. 13.

¹⁹ Cal. Pub. Util. Code §§ 451, 364.

²⁰ NERC, *Level 3 Alert: Essential Action to Industry – Computational Load Modeling, Studies, Instrumentation, Commissioning, Operations, Protection, and Control* (May 4, 2026) at pp. 3-7; CAISO, *Large Load Considerations Issue Paper* (January 2026).

costs across a larger overall demand can lower the cost to individual customers as a result of new data center development.’ SCE views striking that critical balance as the central objective of Track 1.²¹

DCC confirmed the same system benefit: “if planned for and priced appropriately, large load growth can deliver meaningful economic benefits, increase utility revenues, improve utilization of existing and new grid infrastructure, and create broader system benefits for all customers.”²² CLECA concurs that the goal of data center rate design should be accurate cost recovery, not punitive deterrence, and that accurate cost recovery, achieved correctly, benefits all ratepayers.

3. Data Center Tariff Requirements Must Not Extend to Traditional Industrial Customers

The specific grid risks justifying data center-specific treatment are not a function of load size alone, but also of the operational characteristics of computational loads and the stranded cost risk of hyperscale data center loads. NERC’s Level 3 Alert identified power quality issues, rapid ramping behavior, voltage and frequency ride-through characteristics, sub-synchronous oscillation risks, and impacts on short-circuit levels and protection coordination as characteristics specific to computational loads.²³ CAISO identified the same categories of technical risk in its January 2026 Large Load Considerations Issue Paper.²⁴

Such characteristics are not presented by CLECA’s members in the same manner. Industrial facilities with established operating histories, predictable load patterns, and decades

²¹ SCE Opening Comments at pp. 3, 10 (quoting SB 57, Section 2(d)).

²² DCC Opening Comments at p. 3.

²³ NERC Level 3 Alert at pp. 3-7.

²⁴ CAISO, *Large Load Considerations Issue Paper* (Jan. 30, 2026) at 13-14, Available at: <https://www.caiso.com/documents/issue-paper-large-load-consideration-jan-20-2026.pdf>

of participation in the Base Interruptible Program (BIP) present a materially different risk profile than speculative hyperscale data center projects seeking first-time interconnection.

Applying deposit requirements, mandatory minimum bills, long contract terms, and exit fees calibrated to the data center risk profile to existing industrial customers that do not present those risks would not reflect cost causation. The practical consequences would be significant and counterproductive. Capital investment decisions at existing industrial facilities, including investments in process heat electrification, waste heat recovery, carbon capture, and other decarbonization technologies, depend on reasonable interconnection requirements and competitive electricity costs. Requirements designed for speculative hyperscale projects would impose additional financial burdens and uncertainty on the very industrial facilities this proceeding should support in decarbonizing.

For energy-intensive, trade-exposed customers (EITE), the risk is not merely delayed investment. These customers must decarbonize while competing against out-of-state producers operating under lower-cost and, in many cases, less stringent environmental regimes. If California applies data center-specific risk protections too broadly, the risks will decrease the competitiveness of in-state industrial production and increase the likelihood of such production leaving California entirely.

D. Rate Design for Industrial Decarbonization, Electrification, and EITE Retention

1. Current California Rate Design Discourages Industrial Electrification

CLECA's Opening Comments documented that California industrial electricity rates are materially higher than those in other regions, that nonbypassable charges obscure price signals for large industrial customers, and that this structural disadvantage suppresses industrial

decarbonization investment.²⁵ Two environmental organizations, filing independently and without commercial interest in CLECA's members' competitiveness, reached the same conclusion.

Sierra Club, in its Opening Comments, cited a white paper co-authored with American Council for an Energy-Efficient Economy (ACEEE), Industrious Labs, and Synapse Energy Economics, explaining that:

“[C]ommercially available clean technology is available to decarbonize many heat processes used in manufacturing and could provide a direct, proven path to cut emissions while improving air quality and public health.” However, even when accounting for the superior efficiency of heat pumps and other electric technologies, “electricity is not cost-competitive with gas for industrial process heating under today’s electricity rates.”²⁶

NRDC identified the structural cause:

California’s current electricity prices, combined with relatively low natural gas prices, create a structural disadvantage for electrification. In most industrial subsectors, it is significantly more expensive to produce heat for industrial processes using electricity than it is to use fossil fuels. Even highly efficient electric technologies like industrial heat pumps, which typically operate at 200 to 600 percent efficiency compared to roughly 80 percent for a gas boiler, face unfavorable operating economics. Non-coincident peak demand charges compound this problem. These charges, typically based on a customer’s highest 15 minutes of usage in a month, are charged to customers regardless of whether the customer’s peak usage occurs during periods of grid stress or surplus capacity.²⁷

²⁵ *Opening Comments of California Large Energy Consumers Association on Order Instituting Rulemaking on California Advanced Electric Rate Design*, R.26-04-009 (May 11, 2026) (CLECA Opening Comments) at pp. 15-20.

²⁶ *Opening Comments of Sierra Club on Order Instituting Rulemaking on California Advanced Electric Rate Design*, R.26-04-009 (May 11, 2026) (Sierra Club Opening Comments) at p. 7 (quoting ACEEE et al., *Unlocking Industrial Electrification in California: Strategies for Electricity Rate Design and Policy Reform* (December 2025) at p. 1).

²⁷ NRDC Opening Comments at pp. 11-12.

NRDC's analysis concluded that if electricity prices were set at marginal costs for industrial heat equipment, "the economics of producing that heat would improve by 80-90 percent."²⁸ Sierra Club found that solving this problem benefits the system as a whole: properly designed rate reform "can simultaneously lower costs for electrifying industrial customers while incentivizing those customers to shift consumption away from periods of peak system demand," spreading fixed system costs over a larger kilowatt-hour volume and placing "downward pressure on average rates for all customers."²⁹ Sierra Club concluded that "rate design to support industrial electrification supports both California's climate and affordability goals."³⁰

The convergence of NRDC, Sierra Club, and CLECA on this diagnosis reflects a structural deficiency in California's rate design that should be adequately scoped and prioritized in this proceeding.

2. Rate Reform Options: Price Signals, Nonbypassable Charges, and Equipment-Specific Approaches

CLECA's Opening Comments supported exemptions or time-differentiated treatment of nonbypassable charges, Public Purpose Program (PPP) charges, and EPMC-scaled costs (Equal Percentage of Marginal Cost) for incremental load associated with decarbonization investments that would not otherwise occur and would not shift costs to other ratepayers.³¹ NRDC proposed

²⁸ NRDC Opening Comments at p. 12 (citing NRDC, *More Than Just Flipping the Switch: Electricity Rate Reform Is the First Step on the Path to Industrial Electrification* (May 2026)).

²⁹ Sierra Club Opening Comments at p. 7.

³⁰ *Id.*

³¹ CLECA Opening Comments at pp. 18-19.

a related mechanism grounded in the same price-signal objective: equipment-specific submetering at near-marginal cost, based on Ramsey pricing principles. NRDC stated:

Equipment-specific rates offer a way to navigate these constraints without triggering broad rate restructuring. . . . The essential logic is that because new electrification loads are highly price-elastic, and facilities will only install heat pumps if the economics work, regulators are justified in charging these loads at or near marginal cost. Doing so increases the probability that the new load comes online and ensures that any system costs attributable to that load are recovered. Importantly, this approach allows the Commission to address the economics of new electrification loads without requiring broad restructuring of existing industrial tariffs.³²

Both approaches pursue the same objective: removing the structural cost barrier that the current rate design imposes on industrial decarbonization investment while ensuring that costs are accurately allocated. The Commission should consider both mechanisms, along with time-differentiated transmission rates that Sierra Club and NRDC both identified as a particularly important lever for improving the economics of off-peak industrial electrification. The Commission should consider these alongside other mechanisms scoped in this proceeding to achieve beneficial electrification and decarbonization incremental load.³³

Any dynamic rate framework for large industrial customers must be voluntary and compatible with existing reliability demand response programs. Sierra Club found that the volatility of real-time pricing (RTP) “may make these pilot rates inappropriate for many industrial customers exploring electrification.”³⁴ Tesla confirmed from the distributed energy resource (DER) market side that event-based dispatch programs “have proven very effective at

³² NRDC Opening Comments at p. 13.

³³ Sierra Club Opening Comments at p. 7; NRDC Opening Comments at p. 12.

³⁴ Sierra Club Opening Comments at p. 7.

quickly mobilizing large amounts of incremental capacity when called to do so” and that “RTP has yet to demonstrate that it can achieve meaningful scale and deliver the same level of grid services.”³⁵

This cross-market finding supports CLECA’s position that dynamic rate frameworks should be optional and structured to complement, rather than displace, proven reliability demand response programs like BIP. The value of load flexibility is maximized when customers can voluntarily respond through both rate design and program participation, not when one mechanism forecloses the other.

3. Rate Design Outcomes Bear Directly on Emissions Leakage and EITE Retention

The record developed by NRDC and Sierra Club on industrial electrification rate barriers reinforces the EITE customer retention issue CLECA raised in its Opening Comments.³⁶ NRDC and Sierra Club found that California’s current rate design renders electricity uncompetitive for industrial process heat and suppresses decarbonization investment.³⁷ When that rate design makes California electricity uncompetitive for energy-intensive, trade-exposed industrial customers, production moves to jurisdictions with less stringent environmental requirements. In such cases, the emissions reductions California do not occur, and global emissions increase. The rate design failures that NRDC and Sierra Club identified as barriers to electrification³⁸ are the same failures that produce emissions leakage risk.

³⁵ *Opening Comments of Tesla, Inc. on Order Instituting Rulemaking on California Advanced Electric Rate Design*, R.26-04-009 (May 11, 2026) (Tesla Opening Comments) at p. 7.

³⁶ CLECA Opening Comments at p. 7

³⁷ NRDC Opening Comments at p. 10-13, Sierra Club Opening Comments at p. 7-8.

³⁸ *Ibid.*

NRDC's finding that rate reform could improve the economics of industrial electrification by 80 to 90 percent³⁹ illustrates the magnitude of what is at stake. AB 1207 (Irwin), which requires state programs to minimize emissions leakage, reflects the Legislature's recognition that environmental goals and industrial competitiveness are linked, not competing.⁴⁰

Rate design decisions, including cost allocation, nonbypassable charges, and price signals for electrification, will directly affect whether EITE customers can remain competitive here while committing to the capital-intensive decarbonization investments that the state's climate goals require. The Commission should add EITE customer retention as a scoped issue, consistent with the Legislature's interest in preventing emissions leakage and with the environmental parties' findings that the current rate design suppresses the investments needed to achieve California's climate goals.

III. CONCLUSION

The Commission should:

- Establish an expedited track or focused working group process for AB 2109 implementation, consistent with the statutory mandate and the urgency documented by Assemblymember Carrillo;
- Address Issues 3.1.b and 3.1.c in a later track structured as prospective principles for future GRC Phase 2 proceedings, rather than as parallel litigation of issues already before the Commission in pending GRC Phase 2 applications;
- Ensure that any data center rate class or tariff framework is narrowly tailored to the cost drivers and reliability risks specific to computational loads, non-punitive, and grounded in cost causation, with no extension of data center tariff requirements to traditional industrial customers based on load size or industry label alone; and

³⁹ NRDC Opening Comments at p. 12.

⁴⁰ AB 1207 (Irwin), Ch. 117, Statutes of 2025 at p. 6.

- Add EITE customer retention as a scoped issue and develop a rate design for large industrial customers that provides effective price signals and removes the structural barriers to industrial decarbonization investment that NRDC and Sierra Club independently confirmed in their Opening Comments.

CLECA appreciates the opportunity to submit these reply comments.

Respectfully submitted,

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