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PG&E Comments RE Appurtenant and Related Facilities

Additional submitted attachment is included below.



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23 October 2025

California Energy Commission Docket Number 25-RULE-01 715 P Street Sacramento, CA 95814

RE: CEC Staff Workshop - Proposed Amendments to Regulations Related to the Definition of Appurtenant Facility & Related Facility

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the California Energy Commission's (CEC) Staff Workshop on Proposed Amendments to Regulations Related to the Definition of Appurtenant Facility & Related Facility held on October 9, 2025. As Commissioner Gallardo noted in her opening remarks, the CEC's existing regulatory language regarding appurtenant and related facilities has not changed for decades, despite significant shifts in California's energy landscape as well as the types of projects that must seek certification from the CEC.

PG&E agrees with Commissioner Gallardo's reflection that the existing regulatory language creates unintended ambiguity for a variety of energy and associated projects. We have heard from our customers that this regulatory uncertainty is a risk that could materially affect project decisions, including whether to move forward with relevant projects. Beyond impacts on specific projects, PG&E notes that increased uncertainty in California's project pipeline can also increase uncertainty regarding the state's demand forecast.

Accordingly, PG&E sincerely appreciates CEC leadership and staff for recognizing this issue and taking steps to remedy it. The proposed language included in the workshop notice greatly improves the clarity of the CEC's regulatory scope. PG&E has no edits to suggest at this time. We are eager to follow this effort through the rulemaking process and look forward to an expedient finalization of amendments.

Sincerely,

Josh Harmon State Agency Relations