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May 8, 2026

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PACIFIC GAS AND ELECTRIC COMPANY  
2026 Annual Report on PG&E's Load Management Standards Compliance Plan<sup>1</sup>

**Investor-Owned Utility:** Pacific Gas and Electric Company  
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On March 18, 2025, Pacific Gas and Electric Company (PG&E)'s submitted to the California Energy Commission (CEC) its Revised Load Management Standards (LMS) Compliance Plan, titled "PG&E's Second Revised Load Management Standards Compliance Plan, current as of January 1, 2025, with minor grammatical revisions added on February 24, 2025."<sup>2</sup> This plan was approved on May 8, 2026 by the CEC.<sup>3</sup> Per the LMS<sup>4</sup>, PG&E is submitting our annual report on implementation of PG&E's Compliance Plan. PG&E looks forward to continuing to work with the CEC to meet the objectives of the LMS.

Should you have questions or request additional information, please reach out to me.

Sincerely,

Josh Harmon  
PG&E, State Agency Relations

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<sup>1</sup> Pursuant to Title 20, California Code of Regulations Section 1623.1(a).

<sup>2</sup> Available on the [CEC LMS Docket](#), 23-LMS-01

<sup>3</sup> Signed Orders Approving LMS Compliance Plans for PG&E, SCE, SDG&E, VCE, SJCE, and PCE from the May 8, 2025 Business Meeting. Docketed on May 16, 2026.

<sup>4</sup> CCR Title 20 1621(d)(4)

PG&E Approved PG&E 2023 LMS Compliance Plan

2026 Annual Report

Submitted to the CEC

May 8, 2026

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## 0. Introduction

In April 2023, the California Energy Commission (CEC) adopted amendments to the Load Management Standards (LMS) <sup>5</sup> with the goal of advancing time dependent signals that can be used by automation-enabled loads to provide real-time load flexibility on the electric grid.<sup>6</sup> Pursuant to CEC guidance, on October 2, 2023, Pacific Gas and Electric Company (PG&E) submitted its plan to comply with the LMS.<sup>7</sup> Revisions were made to that plan in 2024 and 2025 in response to requests from CEC staff. The most recent version was submitted by PG&E on March 18, 2025, and can be found on the CEC’s LMS Docket.<sup>8</sup> This version was titled “PG&E’s Second Revised Load Management Standards Compliance Plan, current as of January 1, 2025, with minor grammatical revisions added on February 24, 2025”. This March 18, 2025 version of the plan includes description of the status of activities through May 1, 2024. We will refer to this approved compliance plan as PG&E’s “Approved 2023 LMS Compliance Plan” or “approved compliance plan”.

The report presented in this document, the “PG&E 2023 LMS CP - 2026 Annual Report” or “annual report,” is being submitted pursuant to CEC guidance to inform the CEC on progress toward meeting compliance obligations under the LMS.<sup>9</sup> The remainder of this report is organized by the outline provided by CEC staff in their March 24, 2026 “Compliance Assistance Memorandum for Submitting Load Management Standards Annual Reports,” available at the CEC LMS docket. The numbering of the remaining sections of this report mirrors the outline provided in the CEC’s memorandum. This report provides updates on the status of PG&E’s activities to meet LMS requirements across the following areas:

1. Implementation status of rates or programs in the approved compliance plan,
2. Time-varying rate submission to MIDAS,

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<sup>5</sup> The LMS regulations are contained in 20 CCR §§ 1621-1625 and carry out the CEC’s statutory mandate to establish electric load management standards for cost-effective programs and rate structures which will encourage the use of electrical energy at off-peak hours and encourage the control of daily and seasonal peak loads to improve electric system equity, efficiency, and reliability.

<sup>6</sup> Herter, Karen and Gavin Situ. 2021. *Analysis of Potential Amendments to the Load Management Standards: Load Management Rulemaking, Docket Number 19-OIR-01*. California Energy Commission. Publication Number: CEC-400-2021-003-SF. (Dec. 22, 2021.) Available at: <https://www.energy.ca.gov/publications/2021/analysis-potential-amendments-load-management-standards>.

<sup>7</sup> 20 CCR § [1621](#) (d)(1) states, “Each Large IOU shall submit a plan to comply with Sections 1621 and 1623 of this article to the Executive Director no later than six (6) months after April 1, 2023.”

<sup>8</sup> At: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?doctetnumber=23-lms-01>

<sup>9</sup> 20 CCR § [1621](#) (d) (4) states “Large IOUs shall submit to the Executive Director annual reports demonstrating their implementation of plans approved pursuant to this section. The reports shall be submitted one year after plans are approved pursuant to subsection (2) and annually thereafter.”

3. RIN(s) on customer billing statements, and
4. Compliance with any conditions in the order approving the regulated entity's compliance plan.

PG&E is largely on track to meet the LMS requirements. However, as explained in section 1.C of this report, PG&E is planning to submit a request to the CEC Executive Director for approval to modify its Approved PG&E 2023 LMS Compliance Plan. This filing will address changes to PG&E's regulatory and implementation pathway to compliance with the LMS guidance related to making optional hourly marginal cost-based rates available to customers by Jan 1, 2027. In this filing, PG&E will also request an extension to the timeline for incorporating a time-varying transmission price component into PG&E's RTP rate offering.

## 1. Implementation status of rates or programs in the approved compliance plan

This section reviews key activities that PG&E has undertaken since 2023 to comply with the CEC's LMS to propose hourly marginal cost-based rates — referred to as Real-Time Pricing or RTP rates — for all customer classes to our rate making authority, the CPUC, and to implement such rates upon CPUC approval. We first provide some background information on this requirement and PG&E's next steps in the CPUC regulatory process as a pathway to compliance with the LMS. We then review key accomplishments to date with a focus on PG&E's Real Time Pricing (RTP) pilots.

### A. Regulatory Background and Compliance Pathway

#### a. LMS Guidance on Hourly Marginal Cost-Based (RTP) Rates

The LMS require the Large Investor-Owned Utilities (IOUs), Community Choice Aggregators (CCAs), and Publicly Owned Utilities (POUs) to present to their respective rate regulators a proposal for optional RTP rates for each customer class.<sup>10</sup> As an alternative compliance pathway, the LMS also include a provision for an IOU to provide a load flexibility program if LMS-compliant rates are not available to customers by the January 1, 2027 deadline.<sup>11</sup> PG&E plans to have RTP rates available to customers, as approved by the CPUC, by

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<sup>10</sup> CCR, Title 20, § 1621(c)(6) defines customer class as “a broad group of customers used for rate design. Customer classes include but are not limited to residential, commercial, industrial, and agricultural, but does not include street lighting.” Subsequently, CCR, Title 20, § 1623(a) requires that “each Large IOU apply to its rate-approving body for approval of at least one marginal cost-based rate for each customer class.”

<sup>11</sup> 20 CCR § 1623(d)(2).

January 1, 2027. This is consistent with LMS timing, as described below, and therefore PG&E does not have an alternative LMS-compliant program on which to report. The LMS requires RTP rates to include marginal cost-based hourly or sub-hourly generation energy and capacity components (import only, i.e., delivered to the customer), as well as marginal cost-based hourly or sub-hourly distribution and transmission components.<sup>12</sup>

The LMS guidance indicated that RTP rates were to be proposed to PG&E's rate-approving body, the California Public Utilities Commission (CPUC), before January 1, 2025. The rates were then to be made available to customers by January 1, 2027, contingent on approval of those rates and cost recovery by the CPUC.

#### b. PG&E's RTP Rate Proposals and Pilots

PG&E proposed RTP rates to the California Public Utilities Commission (CPUC) in September 2024 to meet the CEC's guidance — before January 1, 2025 — in PG&E's 2023 General Rate Case (GRC) Phase II (A.24-09-014). Prior to PG&E's 2023 GRC Ph II RTP application, the CPUC had instituted the *Demand Flexibility Order Instituting Rulemaking* (R.)22-07-005 (DFOIR) in July of 2022. In the DFOIR Track B, the CPUC developed guidance on RTP rates, which culminated in the CPUC's *Decision Adopting Guidelines for Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company on Demand Flexibility Rate Design Proposals*, issued in August 2025 (D.25-08-049).

In parallel to developing RTP rate design guidance in the DFOIR, the CPUC issued D.24-01-032 in January 2024, which authorized PG&E's Expanded Pilots.<sup>13</sup> PG&E renamed the "Expanded Pilots" adopted in D.24-01-24 to the Hourly Flex Pricing (HFP) Pilots.<sup>14</sup> Another PG&E RTP Pilot, Phase II of PG&E's Vehicle-to-Grid Integration (VGI) Pilots,<sup>15</sup> was approved by CPUC Resolution E-5192 per directives in D.20-12-029 as part of R.18-12-006, titled the *Order Instituting Rulemaking to Continue the Development of Rates and Infrastructure for Vehicle Electrification*, often referred to as the DRIVE rulemaking. Phase II of the VGI Pilot seeks to enable electric vehicle unidirectional and bidirectional charging to optimize bills on RTP. PG&E refers to the HFP and Phase II of the VGI pilot collectively as PG&E's RTP pilots. Both of these

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<sup>12</sup> 20 CCR § 1621(a)(1)

<sup>13</sup> Referred to as the "CalFUSE Expanded Pilots" in the CEC's signed order approving PG&E's compliance plan.

<sup>14</sup> Online site is at: <https://www.pge.com/en/account/rate-plans/hourly-flex-pricing.html>

<sup>15</sup> Online site is at: <https://www.pge.com/en/clean-energy/electric-vehicles/getting-started-with-electric-vehicles/vehicle-to-everything-v2x-pilot-programs.html#hourly-flex-pricing>

pilots have day-ahead hourly marginal-cost-based dynamic rates including hourly dynamic generation and distribution components and are authorized to run through the end of 2027.

**c. Compliance Pathway: Next Steps on RTP and Extending PG&E's RTP Pilots**

In [D.25-08-049](#), the CPUC ordered PG&E to submit supplemental testimony on PG&E's approach to offering RTP, consistent with the LMS's RTP provisions, within 60 days of the Decision.<sup>16</sup> This Supplemental Testimony was submitted in October 2025<sup>17</sup> and provided updates to PG&E's perspectives on RTP rate design. PG&E's Testimony also requested that PG&E be authorized to submit a proposal to extend the HFP pilots past their current sunset date at the end of 2027, as a path to provide continuity of PG&E's RTP offering and to comply with the CEC's LMS guidance to make RTP rates available starting Jan 1, 2027.<sup>18</sup> The electric vehicle charging customers currently served by Phase II of the VGI Pilot would be incorporated into the extended HFP pilot. The CPUC ALJ in A. 24-09-014 has allowed PG&E to submit a "Stop Gap" proposal in to extend the HFP pilot to maintain continuity of PG&E's RTP offering past 2027.<sup>19</sup> PG&E is currently developing a Stop-Gap HFP Extension Proposal, expected to be served as testimony to parties to A.24-09-014 on June 8, 2026.

PG&E needs to leverage the HFP pilot structure in 2027 and beyond because PG&E will not be able to offer post-pilot RTP rates until PG&E's multi-year effort to modernize its billing system is completed, as was explained in PG&E's 2023 LMS Compliance Plan.<sup>20</sup> For PG&E's existing HFP and Phase II of the VGI pilot offerings, PG&E is "shadow billing" participants outside of its billing system through a third party. While this approach is viable in the interim, it is not a cost-effective long-term solution to more broadly scale RTP rate offerings. PG&E's billing modernization effort is being reviewed by the CPUC as part of PG&E's Billing Modernization Initiative (BMI) Application (A.24-10-014). The BMI addresses the fact that PG&E's billing systems are over two decades old and in need of systemwide upgrades and replacement. The

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<sup>16</sup>The CPUC may issue additional guidance on RTP rates. On April 10, 2026, the CPUC issued Rulemaking 25-04-009, "Order Instituting Rulemaking on California Advanced Electric Rate Design", which identifies dynamic rate design requirements as a preliminary issue (page 13.) It is not known what, if any, impact this rulemaking will have on RTP rate design.

<sup>17</sup> A. 24-09-014, Pacific Gas and Electric Company 2023 General Rate Case Phase II Supplemental Testimony Exhibit (PG&E-5) Real-Time Pricing Proposal 5, filed October 29, 2025.

<sup>18</sup> The LMS RTP guidance was affirmed by the CPUC in [D.25-08-049](#) Ordering Paragraph 3. The capacity of the Expanded Pilots to meet LMS guidance was affirmed by the CEC in its *Signed Orders Approving LMS Compliance Plans for PG&E, SCE, SDG&E, VCE, SJCE, and PCE from the May 8, 2025 Business Meeting* at p.2

<sup>19</sup> A. 24-09-014, Administrative Law Judge's Ruling Setting Schedule for the Dynamic Rate Options Track, issued January 7, 2026, page 4.

<sup>20</sup> PG&E Approved 2023 LMS Compliance Plan, pp. 2, 12, and 17.

timing for when PG&E will complete its billing modernization effort and be able to build post-pilot RTP rates in its billing system will be further clarified once PG&E receives guidance from the CPUC’s BMI Decision.

**B. Key Milestones and Major Accomplishments**

**a. Update on PG&E’s RTP Pilots**

PG&E’s RTP pilots, the HFP and Phase II of the VGI Pilots, which were authorized to run through the end of 2027, have been offered to customers since Q4 2024. Both pilots provide access to day-ahead hourly RTP rates that give participants the opportunity to optimize electricity costs by managing load. HFP Pilot 1 serves Agricultural customers and HFP Pilot 2 serves Residential, Commercial, and Industrial customers. Phase II of the VGI Pilot is focused on enabling customers with electric vehicle charging load to respond to RTP rates. These pilots have enrolled 338 MWs of load across over 2,352 customer sites (service agreements) as of April 30, 2026 (Table 1).

**Table 1. Enrollment in PG&E's Real Time Pricing (RTP) Pilots as of April 30, 2026.**

RTP Pilot	Sector Served	Enrolled Sites	Enrolled MW
HFP Pilot 1	Agricultural	1313	101
HFP Pilot 2	Residential	416	4
	Small and Medium Commercial	220	17
	Large Commercial and Industrial	245	39
Phase II of VGI Pilot	Residential	0	0
	BEV	158	177
<b>Total</b>		<b>2,352</b>	<b>338</b>

The hourly price signals customers receive through the HFP and Phase II of the VGI Pilots consist of generation and distribution price components. The generation price signal is comprised of Marginal Energy Costs (MEC) that reflect wholesale energy costs in the CAISO Day-

Ahead Market and Marginal Generation Capacity Costs (MGCC) that capture costs related to reliability needs. Distribution costs are based on forecasted load for a representative circuit.

**Error! Reference source not found.** below provides an overview of key elements of the current HFP rate design that are used for both the HFP pilots and Phase II of the VGI pilots. The pilots are open to customers on eligible rate tariffs across all of PG&E's customer classes (except Streetlighting). Table 3 below shows the eligible rates associated with PG&E's current RTP Pilots, both the HFP pilots and Phase II of the VGI Pilots.

**Table 2. Summary of the Price Signal (Rate Design) for the Hourly Flex Pricing and Phase II of the VGI Pilots**

Line No.	RTP Feature	Existing Pilot Rate Design
1	Marginal Energy Cost (MEC)	CAISO day ahead hourly price at the PG&E Default Load Aggregation Point (DLAP), plus a constant line loss factor.
2	Marginal Generation Capacity Cost (MGCC)	A sigmoidal price curve based on the forecasted adjusted net CAISO load. Designed to collect the average MGCC value over the entire year.
3	Marginal Distribution Capacity Cost (MDCC)	A sigmoidal price curve based on the forecasted load of a representative circuit. Each of PG&E's circuits is mapped to a cluster of circuits that have similar load profiles. A single circuit is chosen that best represents the collective load shape of the entire cluster. Designed to collect the average Primary MDCC value over the entire year. Other MDCC components are not time-varying and are not part of the dynamic RTP rate.
4	Non-Marginal Costs	Collected through subscription, a pre-set usage profile that is billed on a customer's otherwise applicable tariff (OAT). See Line 6 of this table below for more explanation on subscriptions.
5	Export Compensation	Equal to the dynamic MEC, MGCC, and MDCC values. Because the dynamic price is marginal only, the exports are valued at the same price as consumption. Exports covered by the subscription are compensated at the OAT.
6	Subscription Protection	Customers are given a predefined load profile, either based on their historical usage or a class average, which is charged at the customer's OAT. Only deviations from the assumed load profile (above or below) are charged or credited at the dynamic rate. Each month, the load profile may be scaled after the fact so that the total usage in the subscription profile matches the customer's actual usage.
7	Billing Structure	Customers are shadow billed on the HFP rate. At the end of a 12 month "True-Up" period, the customer is given a credit if their performance on the HFP rate is better than their OAT rate. No extra charge is given to customers that perform worse on HFP (meaning their bill on the HFP rate is greater than their bill on the OAT rate).
8	Forward Transactions	Agricultural customers on HFP Pilot 1 have the opportunity to lock in prices for specific hours up to 7 days in advance.

**Table 3. Rate Eligibility on PG&E's Current RTP Pilots.**

Pilot	Rate	Rate Description	Customer Class
PG&E HFP Pilot 1	AG-A1	Maximum Demand < 35 kW Low Usage	Agricultural
	AG-A2	Maximum Demand < 35 kW High Usage	Agricultural
	AG-B	Maximum Demand > 35 kW Medium Usage	Agricultural
	AG-C	Maximum Demand > 35 kW High Usage	Agricultural
PG&E HFP Pilot 2	E-ELEC	Electrification rate: qualifying technologies: electric vehicle charging, energy storage, or electric heat pump	Residential
	EV2A	Electric Vehicle Rate: qualifying technologies: electric vehicle or storage	Residential
	B6	Commercial Maximum demand of 75 kilowatts (kW)	Small Business
	B10	Commercial/Industrial Maximum demand of 75-499 kW	Medium Business
	B19	Commercial/Industrial Maximum demand of 500-999 kilowatts (kW)	Large Commercial and Industrial (C&I)
	B20	Commercial/Industrial maximum demand greater than 999 kW	Large C&I
Phase 2 of VGI Pilot 1	E-ELEC	Electrification rate - qualifying technologies: electric vehicle charging, energy storage, or electric heat pump for water heating or climate control.	Residential
	EV2A	Electric Vehicle Rate: qualifying technologies: electric vehicle or storage	Residential
	B6	Commercial Maximum demand < 75 kilowatts (kW)	Small Business

Pilot	Rate	Rate Description	Customer Class
Phase 2 of VGI Pilot 2	B10	Commercial/Industrial Maximum demand of 75-499 kW	Medium Business
	B19	Commercial/Industrial Maximum demand of 500-999 kilowatts (kW)	Large C&I
	B20	Commercial/Industrial maximum demand greater than 999 kW	Large C&I
	BEV-1	Business Electric Vehicle Rate Low Use	Business EV
	BEV-2	Business Electric Vehicle Rate High Use	Business EV

Customers enrolled in HFP and Phase 2 of the VGI Pilot 2 have the following end-uses that may be leveraged to respond to RTP signals:

- Residential electric vehicles
- Electric buses
- Pumping and other irrigation controls
- Cold storage
- Climate control (HVAC) and air handling (commercial and residential)
- Heat pumps for climate control and/or hot water heating
- Restaurant equipment (e.g., walk-in refrigeration, dishwashing, etc.); and
- Battery energy storage systems

## b. Public information program

The LMS require that PG&E conduct a public information program to inform customers about RTP rates.<sup>21</sup> PG&E's current public information activities, which we will refer to here as "Marketing, Education, and Outreach (ME&O)" are focused on supporting customers enrolled in PG&E's existing RTP pilots, the HFP and Phase II VGI Pilots described in Section 1.B.a of this report.

PG&E continues to evaluate lessons learned from implementation of the HFP and Phase II of the VGI pilots and identify ways to improve communications provided to participating customers. Experience from these pilots demonstrates the importance of clear, timely communications to help customers understand hourly pricing and respond to price signals.

ME&O efforts are currently centered on ongoing customer participation. This includes maintaining and updating program webpage content to reflect the most current information and ensure participating customers have access to accurate, up-to-date resources. As part of the HFP pilots, participating customers also receive a monthly performance statement that summarizes and compares their electricity costs on the hourly pricing relative to their existing PG&E energy statement. The performance statement is intended to help customers understand if they are saving money through HFP. This work supports customer education and engagement during the pilot period while customers continue to receive and pay their standard utility bill. PG&E maintains a pilot-specific email address that is utilized for proactive customer communications and is available for customers to contact PG&E with questions on Hourly Flex Pricing. PG&E is also in close coordination with participating Automation Service Providers (ASPs) and participating Community Choice Aggregators (CCAs) to assist them in supporting their enrolled customers.

## C. Deviations from Approved LMS Compliance Plan

The CEC's Guidance document for this report asks that the report address any deviations from PG&E's approved compliance plan. In this section, PG&E outlines deviations from PG&E's Approved 2023 LMS Compliance Plan in terms of PG&E's compliance pathway for meeting the LMS guidance to make RTP rates available to customers by Jan 1, 2027. The two deviations are the following: 1) PG&E needs to update the overall regulatory pathway and implementation timeline for providing RTP rates to customers that was presented in Appendix A of the approved plan; and 2) PG&E will need more time to develop a Transmission price component for PG&E's

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<sup>21</sup> 20 CCR § [1623](#) (d)(3)

RTP rate offering. PG&E plans to submit an extension request<sup>22</sup> to the CEC no later than August 2026 to address these deviations and ask for approval to modify PG&E's regulatory pathway and implementation timing for making RTP rates available, and to request a delay in the incorporation of a dynamic transmission RTP price component, as further described below.

#### a. Timing for Offering an LMS Compliant Rate

In its 2023 Approved LMS Compliance Plan, PG&E presented an estimated timeline for meeting the LMS guidance to provide RTP rates to customers by Jan 1, 2027. This timeline, presented as Appendix A in the plan, no longer reflects PG&E's proposed compliance pathway. For example, in the 2023 approved plan, PG&E presented a timeline in which PG&E would receive a Final Decision on its 2023 GRC Ph II RTP proposal in Q3 2026. This timing no longer applies as is further explained in section 1.A.c above. PG&E will provide an updated timeline in our planned extension request.

#### b. Transmission Price Component

In PG&E's 2023 LMS Compliance Plan, PG&E presented a plan to incorporate a time-varying transmission price component into its RTP rate by Jan 1, 2027.<sup>23</sup> PG&E needs to delay this timing, as PG&E needs to address challenges experienced in the HFP and Phase II of the VGI pilots with the design and application of the time-varying distribution price component, before further complicating the dynamic price signal by adding a time-varying transmission price component.<sup>24</sup> PG&E believes that PG&E's RTP pilots will continue to provide a meaningful hourly price signal. A preliminary analysis of the dynamic signal shows that only about 14 percent of the total variability of the dynamic hourly rate would come from Transmission.<sup>25</sup>

## 2. Time-varying rate submission to MIDAS

Along with requiring the development of an RTP rate proposal, the April 2023 update to the LMS also included provisions for California's Load Serving Entities (LSEs) to implement tools,

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<sup>22</sup> Per 20 CCR § 1621\_(e)

<sup>23</sup> PG&E 2023 LMS Compliance Plan, pp. 8-12.

<sup>24</sup> Challenges identified with the distribution prices component are described in PG&E's A.24-09-014, General Rate Case Phase II Application of Pacific Gas and Electric Company, Supplemental Testimony submitted October 29, 2025. See Exhibit 5, Chapter 1 Introduction: RTP regulatory background; experience with RTP pilots; and related policy issues, including dual participation.

<sup>25</sup> The average price variation is approximately 66 percent generation, 20 percent distribution, and 14 percent transmission. See PG&E's 2023 GRC Phase II (A. 24-09-014) testimony and workpapers (Exhibit 5, Chapter 2), filed October 29, 2025, for more details.

platforms and processes to deliver RTP price signals to customers, automated service providers, and/or automated appliances. These include uploading time-varying rates to the CEC's Market Information Demand Automation Server (MIDAS), designed to be a machine-readable database of rates and other grid signals that can be used to automate demand flexibility.<sup>26</sup> PG&E began uploading time-varying rates to MIDAS in June 2023, before the deadline of June 30, 2023. PG&E instituted a more efficient automated process in April 2024 and has continued to update MIDAS as rate values (prices) have changed for the rate schedules that are available through MIDAS. PG&E started publishing HFP day-ahead prices to MIDAS in May 2025.

In response to the CEC's guidance on this annual report to provide a list of Rate Identification Numbers (RINs) that are being uploaded to MIDAS, PG&E provides Attachment A "2025 PG&E LMS CP Annual Report List of RINs" that PG&E is uploading to MIDAS as of April 15, 2026. This attachment contains two tabs:

- The Summary tab shows the number of customers and annual load for the included modifiers (SmartRate, CARE/FERA and Medical Baseline for Residential rates, and Peak Day Pricing for Non-Residential) as well as the excluded modifiers that fall below the 0.5% threshold for customers or load.
- The RIN Usage Data shows the total number of customers and annual load for each RIN at the end of 2025.

### 3. RIN(s) on customer billing statements

The LMS require that LSEs enable customer and third-party provider access to rate information through the development of Rate Identification Numbers (RINs) that capture the specific pricing for a customer premise.<sup>27</sup> PG&E added the RIN, and QR code for the RINs, on the electric service agreement details page of the PG&E's energy statement in April 2024 per the LMS requirements, though not every customer type was able to be addressed through the initial project. Since then, as of November 3, 2025, PG&E has implemented an IT project that allows residential customers who receive CARE, FERA, and Medical Baseline discounts to view RINs directly on their energy statements. This project also enabled Large Commercial and Industrial customers to see RINs and QR codes on their billing statements that reflect different pricing for Primary, Secondary, or Transmission voltage service.

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<sup>26</sup>20 CCR § 1623(b)

<sup>27</sup> 20 CCR § 1623(c)(4)

Both bundled and unbundled Residential and Non-Residential customers are able to see RINs on their Energy Statements. When customers point their smartphone camera at the QR code on their bill, they see their RIN displayed on the screen. The RIN is also printed below the QR code for customers who do not use a smartphone. A sample bill is available in PG&E's [Advice Letter 7136-E-B](#).

Additionally, per CEC staff request, development has begun to integrate RINs for customers whose generation service is served by a Community Choice Aggregator into a single QR code, rather than seeing two RINs for their delivery rates and CCA rates. This will allow customers to access both the PG&E and CCA RINs when scanning the single QR code. This project is expected to be completed by July 2026.

Finally, RIN information is available on the monthly supplemental Hourly Flex Pricing statement that tracks customers' performance while on the pilot program.

#### 4. Additional Conditions in the Approving Order

The CEC's Guidance document for this report asks that the report address any additional conditions in the order that approved PG&E's compliance plan. In the CEC's "Signed Orders Approving LMS Compliance Plans for PG&E, SCE, SDG&E, VCE, SJCE, and PCE from the May 8, 2025 Business Meeting", the compliance plans were approved on "condition that the final RIN tool plan be submitted by May 8, 2026". This 'Single Statewide RIN Access Tool'<sup>28</sup> would facilitate third parties' access to customer rate information. PG&E led an effort to outline a proposal for how such a tool could be structured in coordination with the multiple Load Serving Entities that would be needed to meet the requirements specified in 1623(c).<sup>29</sup> This proposal was submitted to the CEC in October 2024.<sup>30</sup> Interested parties provided comments on the Statewide RIN Access tool in January 2025. The CEC considered next steps on this effort and has extended the deadline for the Statewide RIN access tool to May 8, 2029.<sup>31</sup> Additionally,

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<sup>28</sup> Also known as the Single Statewide Tool (SST).

<sup>29</sup> The requirements include, but are not limited, to the allowing a customer to authorize a Third Party to do the following:

- a) look up the customer's RIN,
- b) Provide any RINs for which the customer is eligible,
- c) Provide a rate comparison between the customer's current rate and any eligible rates,
- d) Upon direction and consent of customer, allow the Third Party to modify the customer rate.

<sup>30</sup> Single Statewide Tool Joint LMS LSEs Submission, Oct 1, 2024. CEC LMS docket ([23-LMS-01](#))

<sup>31</sup> 2026 Business Meeting Agendas, Transcripts, and Public Comments. Approval of Load Management Standards Compliance Plans for MCE and SCP ORDER NO: 26-0312-03b at p. 7.

the CEC has opened a Rulemaking (26-OIR-01) to reconsider the LMS requirements that pertain to the Statewide RIN Access Tool.<sup>32</sup>

In September 2025, the CPUC opened the Enhanced Demand Response Order Instituting Rulemaking (EDROIR, R.25-09-004) which will provide further guidance on systems and processes to support RTP. According to the Scoping Memo for the proceeding, a CPUC proposal on Data Access and Systems and Processes is planned to be shared through this proceeding. PG&E expects the EDROIR to provide further guidance on data access topics relevant to RTP and the LMS.

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<sup>32</sup> Order Instituting Rulemaking to Improve Implementation and Expand Participation Under the Load Management Standards (CEC Memo to Open New Docket 26-OIR-01, April 9, 2026)