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*Comment Received From: Utility Consumers' Action Network  
Submitted On: 7/29/2026  
Docket Number: 22-OII-01*

**UCAN Comments for CEC Wkshp Role of DERs in CAs Energy  
Future with Data Access Comments Attached**

*Additional submitted attachment is included below.*



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July 29, 2026

California Energy Commission  
715 P Street  
Sacramento, CA 95814

**RE: July 15, 2026 CEC Workshop on the Role of DERs in California's Energy Future; UCAN Comments Plus Data Access Comments Attached  
CEC Docket 22-OII-01: UCAN Comments on Order Instituting Informational Proceeding on Distributed Energy Resources (DERs) in California's Energy Future**

Dear California Energy Commission Members and Staff,

UCAN is a nonprofit public benefit organization whose purpose is to participate in utility-related hearings before administrative and regulatory bodies, representing the viewpoint of ratepayers in the San Diego Gas and Electric territory. UCAN mainly participates in proceedings at the California Public Utilities Commission (CPUC) and has done so since 1983.

UCAN enjoys the occasion to also participate in proceedings with the California Energy Commission (CEC) because much of UCAN's work at the CPUC provides deeper insights into work being done at the CEC. This is certainly true for the above-referenced docket as UCAN has been active in related CPUC Rulemakings, including proceedings for a High DER Future (R.21-06-017) and a deep dive into Data Access issues (R.22-11-013). UCAN attended the CEC Workshop on July 15, 2026, and offers the following high-level comments.

First and foremost, ratepayers in the San Diego Gas & Electric territory have one opinion - rates are too high - with nearly 20% struggling to keep up with

payments.<sup>1</sup> The California Public Advocates Office presentation by Shelly Lyser at the workshop highlighted how its Quarterly Electric Rates Reports show the shocking increase in electricity rates when compared to inflation (117% to 42% since 2014 for SDG&E).<sup>2</sup> UCAN appreciates the work and documentation that these reports provide showing high rate increases and devastating effects on increasing arrearages.

However, by examining the role of DERs in managing California's load growth in an optimal way, UCAN believes help is on the way.

CEC President McAllister opened the workshop by describing how California can add load in an optimal way by efficiently and effectively using DERs. This includes front-of-the meter opportunities to unlock DER assets and also behind-the-meter opportunities to use dynamic rates and shift loads to when energy is abundant and needing to be used up. CPUC President Reynolds discussed "location-specific support for the distribution grid" which could provide significant cost savings for ratepayers by avoiding expensive distribution and other system upgrades. The workshop presentations then described studies, reports, and data showing that these ideas are close-at-hand just waiting for good policy to guide them forward. UCAN supports these ideas believing that incorporating DER values into the grid can drive down system costs and stop the upward spiral of increasing rates.

One glaring problem, however, highlighted by several parties and speakers at the workshop, is the need to fix "the data problem." In many proceedings at the CPUC, UCAN has described this problem and offered solutions. Most recently, UCAN offered reply comments in the R.22-11-013 Data Access proceeding describing in detail how to fix the data problem. UCAN believes these comments can help the CEC in this proceeding as both the CPUC and CEC work to solve this problem together for the sake of California's Energy Future, which will hopefully be less costly, more efficient and reliable than it is today.

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<sup>1</sup> <https://www.kpbs.org/news/quality-of-life/2026/07/08/sdg-e-presents-2028-rate-increase-proposal-to-energy-stakeholders>

<sup>2</sup> <https://www.publicadvocates.cpuc.ca.gov/-/media/cal-advocates-website/files/press-room/reports-and-analyses/260727-public-advocates-office-q2-2026-electric-rates-report.pdf>; reference to Slide 9.

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

Order Instituting Rulemaking to Consider  
Distributed Energy Resource Program Cost-  
Effectiveness Issues, Data Access and Use  
and Equipment Performance Standards.

R.22-11-013  
(Filed November 17, 2022)

**REPLY COMMENTS OF THE UTILITY CONSUMERS' ACTION NETWORK (UCAN)  
ON THE RULING SEEKING COMMENTS ON DWG REPORT**



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July 13<sup>th</sup>, 2026

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## SUMMARY OF RECOMMENDATIONS

UCAN restates all of the recommendations made in its Opening Comments, organized below into those amended in reply and those restated without change.

### **Recommendations Restated Without Change from UCAN’s Opening Comments:**

1. Correct the DWG Report as identified in UCAN’s Opening Comments: (1) the typographical error at page 80 of the DWG Report (referring to the specific “aggregator” name, not “aggregate” name); and (2) the summary at page 106 of the DWG Report, which mischaracterizes UCAN’s written comments on the draft report. UCAN strongly supports implementation of a Statewide Data Platform, along with complementary improvements to existing Share My Data systems. (UCAN Opening Comments at 2-3.)
2. Adopt interim measures for existing platforms: enforceable Share My Data performance standards, OAuth 2.0 authentication, multi-party tokenized authorization, and Green Button Alliance certification of each utility’s Green Button implementation. (UCAN Opening Comments at 9-10.)

3. Resolve Recommendation C.b.i by directing the evaluation of premises-to-circuit mapping conditions in this proceeding, with permissioned access and appropriate controls. (UCAN Opening Comments at 11-12.)
4. Adopt the API access principle of Recommendation B.a.vii for all hosted data products. (UCAN Opening Comments at 11.)
5. Apply five factors when determining which Priority Use Cases warrant Commission action in this proceeding: ratepayer value; whether the required data already exists and is validated; whether proven, commercially available solutions exist; proceeding fit; and urgency created by existing regulatory deadlines. (UCAN Opening Comments at 12-14.)
6. Prioritize Priority Use Case #4 and Recommendations B.a.v, B.a.vi, C.b.i, and C.b.ii for resolution in this proceeding, with Recommendations D.i through D.iii prioritized for consideration in coordination with the High DER Future proceeding; consistent with CalCCA, treat improved access to timely, accurate, and complete interval customer usage data for CCAs as a priority use case (UCAN Opening Comments at 3, 14.)
7. Establish a Phase Three of this proceeding,<sup>1</sup> or a successor proceeding to finalize implementation proposals and to assess cost-effectiveness, cost allocation, and cost recovery. (UCAN Opening Comments at 19.)

**Recommendations Amended in Reply:**

8. Convene, in coordination with the CEC, an implementation-focused working group as proposed by AEU, tasked with delivering within six months a Statewide Data Platform proposal, and direct that the process begin with a public, non-binding RFI with a defined pathway to a Request for Proposals if cost-effective alternatives are identified. The scope should include SoCalGas, and the process should be consolidated with the data systems work in the Demand Response proceeding (R.25-09-004) and coordinated with the CEC's Load Management Standards rulemaking (26-OIR-01) and the High DER Future proceeding (R.21-06-017). Retain an independent system integrator consultant to support the working group, define Key Performance Metrics, scope required changes to utility back-end systems, and support the RFI, and require the utilities to disclose a comprehensive account of current data system costs and a feature-by-feature identification of genuinely duplicative functionality. The working group should additionally evaluate governance mechanisms that provide for continuous feedback and adaptation of data interchange requirements. (UCAN Opening Comments at 7-9, 21. Amended to incorporate AEU's working group structure and governance evaluation responsive to UtilityAPI's comments as endorsed by CalCCA, as discussed in Sections II.B and II.H herein.)
9. Order all three electric utilities to provide complete AMI interval usage data to CCAs and authorized third parties on a lagged basis of up to, but not exceeding, 24 hours, with compliance schedules and reporting; order that each utility's Green Button implementation be certified by the Green Button Alliance; and direct the independent system integrator consultant to assess any upstream barriers in utility systems to operationalizing this functionality. (UCAN Opening Comments at 4. Amended in response to utility opening comments, clarifying Green Button batch processing functionality and recommending Green

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<sup>1</sup> References to a "Track Three" in UCAN's Opening Comments were misstated and should have referred to a "Phase Three."

Button certification in that context, and making explicit that the system integrator consultant's scope should address low-latency CCA data access, as discussed in Section II.A herein.)

10. Adopt a portfolio-wide, net-of-existing-infrastructure cost-effectiveness framework for evaluation of the Statewide Data Platform, as proposed by AEU, incorporating evaluation of tiered user-fee structures (with fee design and adoption reserved for a successor phase or proceeding categorized as ratesetting), evaluation of tangible and intangible benefits, and post-implementation benefit measurement and reporting. (UCAN Opening Comments at 9, 19-20. Amended to adopt AEU's framework, with SBUA's and Cal Advocates' refinements, as discussed in Sections II.B herein.)
11. Take steps to establish a statewide DER Registry administered by a qualified neutral third-party data steward responsible for defining user roles and access levels and establishing protocols for automated data transfers and updates, proceeding through an implementation-focused working group / steering committee consistent with AEU's Statewide Data Platform proposal, and supported by an independent technical consultant retained by the Commission to advise Energy Division on registry design and implementation, including the data schema, update protocols, integration with existing platforms, and issuance of a Request for Proposals (RFP) to implement and operate the registry; the first consulting deliverable should be the DER data gap assessment recommended by Cal Advocates, and design work should leverage EPRI's FLEXIT universal registry specification and AEMO's DER Register precedent. A two-phase process should be anticipated: (1) compilation and validation of static data elements in the utilities' possession, followed by (2) integration of dynamic and operational data elements, including data that must be incented into existence through a Flexibility Market Platform or comparable distribution grid service procurement mechanism, pending resolution of scoped issues in the High DER Future proceeding, consistent with CalCCA's comments. (UCAN Opening Comments at 15-18. Amended to incorporate Cal Advocates' gap assessment and AEU's working group structure, as discussed in Sections II.D and II.H herein)
12. Adopt, in the decision resulting from this Ruling, the requirement for an automated program enrollment data exchange between utilities, CCAs, and third-party program administrators, with defined data fields, update frequency, and governance protocols, implemented through a single interface common to all utilities, whether the DER Registry or a purpose-built interface, and designate the implementation venue with direction to coordinate with the Demand Response proceeding. (UCAN Opening Comments at 10-11. Amended to address venue coordination raised by PG&E, SDG&E, SoCalGas, and CalCCA, and to clarify the requirement that a single common interface be ordered to prevent further system fragmentation, as discussed in Section II.F herein.)
13. To make the DWG Report operational, identify for each adopted recommendation whether it is a near-, medium-, or long-term objective and the proceeding or initiative in which it will be implemented, and expressly allocate issues between this proceeding or its successor and the High DER Future proceeding, as set forth in UCAN's Opening Comments, with clear directives identifying the data access and interchange functions that must not be permitted to evolve differentially across the utilities. (UCAN Opening Comments at 21-22. Amended to address coordination of the Statewide Data Platform, DER Registry, and Flexibility Market Platform, as discussed in Section II.G herein.)



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

Order Instituting Rulemaking to Consider  
Distributed Energy Resource Program Cost-  
Effectiveness Issues, Data Access and Use  
and Equipment Performance Standards.

R.22-11-013  
(Filed November 17, 2022)

**REPLY COMMENTS OF THE UTILITY CONSUMERS' ACTION NETWORK (UCAN)  
ON THE RULING SEEKING COMMENTS ON DWG REPORT**

**I. INTRODUCTION**

Pursuant to the Administrative Law Judge's Ruling Seeking Comments on Data Working Group (DWG) Report, issued June 12, 2026, and the Administrative Law Judge's Ruling Extending Time for Party Comments, issued June 22, 2026, the Utility Consumers' Action Network (UCAN) respectfully submits these Reply Comments.

Four conclusions emerge from the opening comments:

1. The record demonstrates that the utilities are functionally capable of providing updated interval usage data within 24 hours, and are providing low-latency data to authorized third parties today; what Pacific Gas and Electric Company (PG&E) and San Diego Gas & Electric Company (SDG&E) have not done, unlike Southern California Edison Company (SCE), is extend comparable low-latency interval data access to community choice aggregators (CCAs).
2. A broad coalition supports moving forward with evaluation of a Statewide Data Platform for confidential (not public) data access through a Request for Information (RFI) and related record development, including Advanced Energy United (AEU), the California Community Choice Association (CalCCA), Small Business Utility Advocates (SBUA), and the Clean Coalition, while the Southern California Regional Energy Network (SoCalREN) does not

oppose that evaluation, the Public Advocates Office (Cal Advocates) recommends prioritization of the DWG Report’s related recommendation, and PG&E does not oppose continued evaluation of statewide data access improvements.<sup>2</sup>

3. Support for advancing the DER Registry is likewise broad. CalCCA identifies Recommendation B.a.v as a priority and describes how a properly designed registry would facilitate widespread DER deployment; AEU is “supportive of further exploration of a DER Registry” and documents that Maryland has ordered implementation of a central DER Registry and that Illinois utilities have proposed integrated data platforms encompassing DER data; SBUA supports a registry that proves cost-effective; Cal Advocates prescribes a DER data gap assessment as the appropriate next step; and SoCalREN does not oppose further evaluation.<sup>3</sup>
4. The objections raised by the utilities are, in substance, demands for the very record development that UCAN’s and other parties’ recommendations would produce: comprehensive cost data, defined scope and functionality, competitive benchmarks, and demonstrated ratepayer benefit. SCE’s proposed staged evaluation process,<sup>4</sup> culminating in a benefit-cost analysis informed by an RFI and vendor engagement, converges on the same sequence UCAN and AEU have proposed.

The utilities’ objections to the DER Registry and Statewide Data Platform should also be weighed against the documented record of deficiencies and mismanagement in the data systems and databases that the utilities administer, a record that is part of what led the Commission to

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<sup>2</sup> See AEU Opening Comments at 2-3, 6-8; CalCCA Opening Comments at 6-8, 13-14; SBUA Opening Comments at 2, 5-6; Clean Coalition Opening Comments at 2-3; SoCalREN Opening Comments at 4; Cal Advocates Opening Comments at 4-5; PG&E Opening Comments at 13.

<sup>3</sup> See CalCCA Opening Comments at 7-8; AEU Opening Comments at 2, 5; SBUA Opening Comments at 4-5; Cal Advocates Opening Comments at 15-16; SoCalREN Opening Comments at 9.

<sup>4</sup> SCE Opening Comments at 4-5.

establish this proceeding’s data track and the DWG itself. That record includes more than a decade of underperformance in third-party and CCA data access, with platform outages, authorization failures, and persistent latency documented throughout the DWG Report;<sup>5</sup> the fact that not one of the utilities has certified their Green Button Connect platform as being compliant with the standard;<sup>6</sup> the Phase 1 Electrification Impacts Study’s finding, in the High DER Future rulemaking, that approximately 80 percent of the DER asset records in utility interconnection datasets were missing energy ratings;<sup>7</sup> and the broader catalogue of AMI measurement anomalies, distribution system mapping gaps, and unmatched DER interconnection records that UCAN summarized in the High DER Future proceeding, including physically impossible load readings recorded across most PG&E meters on a single day, one million SCE meters missing observations in a single month, and 13 to 17 percent of feeders lacking a join to a substation bank.<sup>8</sup> These deficiencies — of utility administration of customer usage, distribution grid, and DER data — came to light largely through independent compilation and review by neutral third party consultants, not utility self-reporting. UCAN returns to this record in Sections II.C and II.D below.

Lastly, the opening comments supply constructive refinements that UCAN incorporates into its recommendations, as reflected herein below and in the Summary of Recommendations preceding these comments.

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<sup>5</sup> DWG Report at 42-44, 103-105.

<sup>6</sup> DWG Report at 103.

<sup>7</sup> R.21-06-017, Electrification Impacts Study Part 1 at 144, available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M508/K423/508423247.PDF>.

<sup>8</sup> UCAN, Future Grid Workshop #2: Gaps & Barriers for California’s High DER Future, R.21-06-017, Track 2 (Mar. 12, 2024) (UCAN Workshop 2 Presentation), slides 9-11, available at: [https://gridworks.org/wp-content/uploads/2024/03/final-UCAN\\_Future-Grid-Workshop-2\\_12March2024.pdf](https://gridworks.org/wp-content/uploads/2024/03/final-UCAN_Future-Grid-Workshop-2_12March2024.pdf).

## II. DISCUSSION

### A. The Record Demonstrates That the Utilities Are Functionally Capable of Providing Updated Interval Data Within 24 Hours, and the Commission Should Order Them to Extend That Capability Uniformly to CCAs and Authorized Third Parties

UCAN's Opening Comments traced the legislative and regulatory foundation for low-latency interval data access: Senate Bill 17 and Senate Bill 790, D.12-08-045, and D.13-09-025, in which the Commission required that authorized third parties receive access to updated interval usage data "on a lagged basis of up to 24 hours," directed the utilities to promote uniformity in system implementation, and required that CCAs receive information on an equal footing with any other third party.<sup>9</sup> The operative questions for this proceeding are functional capability and parity of access, and the record resolves both.

On capability, the record is uniform. Each utility collects AMI interval data from all smart meters and completes validation processing daily, at success rates of 98 percent or greater, typically by 8:00 a.m.<sup>10</sup> PG&E states that validated data becomes available after scheduled batch processes that "occur several hours after the underlying usage interval,"<sup>11</sup> and PG&E's Share My Data architecture is designed to make revenue-grade interval data available externally within 36 to 48 hours.<sup>12</sup> SCE reports that it is "often only in possession of complete customer data the following day and provides it to authorized parties shortly thereafter," typically within one to two calendar days, on its first-generation AMI system.<sup>13</sup> The delivery mechanism is equally available: the Green Button Connect framework the utilities already operate is defined by the NAESB REQ.21 Energy Services Provider Interface (ESPI) standard, which includes batch and bulk transfer resources through which a utility delivers multiple authorized customers' updated

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<sup>9</sup> UCAN Opening Comments at 4-6.

<sup>10</sup> *Ibid.*, at 5-6, citing DWG Report at 41.

<sup>11</sup> PG&E Opening Comments at 15.

<sup>12</sup> DWG Report at 43.

<sup>13</sup> SCE Opening Comments at 13-14.

usage data to a third party in a single operation.<sup>14</sup> In short, the upstream systems produce complete, validated interval data on a daily cycle, and the standard the utilities have already implemented contains the batch functionality needed to deliver it.

On parity, the record is equally clear, and it is the disparity that requires Commission action. The utilities provide low-latency interval data to authorized non-CCA third parties today: PG&E's Share My Data platform serves registered third parties on the D.13-09-025 update cycle, and SCE typically provides data to third-party demand response providers within one to two calendar days.<sup>15</sup> SCE has extended the same performance to CCAs, delivering raw usage data within 24 hours.<sup>16</sup> PG&E and SDG&E have not. CCAs in PG&E's territory report actual availability of three to seven days, and CCAs in SDG&E's territory report three to five days to receive data for approximately 95 percent of accounts, notwithstanding both utilities' daily validation cycles.<sup>17</sup> This functional record is not in dispute: the capability exists, it is exercised for some third parties, and it has not been extended to CCAs by two of the three electric utilities. That two-tier outcome is irreconcilable with the uniformity and equal-footing principles the Commission has already articulated, and with the operational needs CalCCA documents: delayed, incomplete, and inaccurate interval data impairs CCA billing, load forecasting, procurement, and load flexibility program management, and jeopardizes CCA compliance with the California Energy Commission's (CEC) 2027 Load Management Standards deadline for

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<sup>14</sup> See NAESB, REQ.21, Energy Services Provider Interface (ESPI) standard, available at: [https://www.naesb.org/ESPI\\_Standards.asp](https://www.naesb.org/ESPI_Standards.asp); Green Button Alliance, Green Button Developers documentation (describing the Batch and Bulk resource endpoints, including the Data Custodian bulk request interface), available at: <https://green-button.github.io/developers/>.

<sup>15</sup> DWG Report at 43; SCE Opening Comments at 13-14.

<sup>16</sup> *Ibid.*, at 46 (Table 1).

<sup>17</sup> *Ibid.*, at 43, 46 (Table 1), and 122 (Table 5); UCAN Opening Comments at 5-6.

dynamic rates.<sup>18</sup> CCAs serve more than 15 million customers, roughly one-third of the California Independent System Operator's (CAISO) load.<sup>19</sup>

SDG&E and SoCalGas urge that any new data access obligation be grounded in a clear record and sequenced behind program design in other proceedings.<sup>20</sup> That framework has no application here: the data already exists in validated form in utility back-end systems, the delivery standard is already implemented, and the capability is already exercised for other third parties. UCAN accordingly reaffirms its recommendation, as amended: the Commission should (1) order all three electric utilities to provide complete interval usage data to CCAs and authorized third parties on a lag of up to, but not exceeding, 24 hours, with compliance schedules and reporting; (2) order that each utility's Green Button implementation be certified by the Green Button Alliance, so that conformance with the standard, including its batch transfer functionality, is independently verified rather than self-declared; and (3) direct the independent system integrator consultant that UCAN recommends the Commission retain, as described in Section II.B below, to assess any upstream barriers in utility systems to operationalizing this functionality (such as AMI collection cycles, meter data management batch schedules, and billing system integration constraints), and to scope the required remediation and/or review utility upgrade proposals for sufficiency.

**B. The Commission Should Adopt AEU's Implementation-Focused Working Group Structure and Portfolio-Wide Cost-Effectiveness Framework — Which, as Refined by UCAN, Satisfy Cal Advocates' Conditions**

AEU's opening comments propose that the Commission serve as a facilitator by convening an implementation-focused working group, in collaboration with the CEC, charged with delivering within six months a data access platform proposal including a governance

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<sup>18</sup> CalCCA Opening Comments at 6-7.

<sup>19</sup> *Ibid.*, at 10.

<sup>20</sup> SDG&E/SoCalGas Opening Comments at 1-2, 22.

framework, reference architecture, interoperability standards, a phased implementation roadmap, funding and fee recommendations, and a benefits evaluation framework, beginning with a public, non-binding RFI.<sup>21</sup> AEU distinguishes this structure from a general-purpose working group: it is a steering process tasked with driving to a resolution, with defined deliverables and deadlines, and it may conclude with a recommendation for no action.<sup>22</sup> AEU also documents that Texas, Illinois, Massachusetts, and Maryland have each concluded through their own regulatory or legislative processes that shared data platforms warrant investigation or development, including the Maryland Public Service Commission's May 6, 2026 order directing utilities to file draft regulations within six months to implement a statewide data exchange platform and a public-facing DER Registry.<sup>23</sup>

UCAN endorses this structure, subject to three points of integration with UCAN's opening recommendations:

1. First, the independent system integrator consultant recommended by UCAN should support the working group and the RFI process, so that the Key Performance Metrics, the utility back-end scoping and validation analysis, and the RFI functional requirements are developed by a technically qualified, independent party rather than negotiated among interested stakeholders.<sup>24</sup>
2. Second, the pathway from RFI to a Request for Proposals upon identification of cost-effective alternatives should be defined at the outset, consistent with UCAN's Opening Comments and Leap's informal comments on the draft DWG Report.<sup>25</sup>

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<sup>21</sup> AEU Opening Comments at 6-8.

<sup>22</sup> *Ibid.*, at 6-7.

<sup>23</sup> *Ibid.*, at 5.

<sup>24</sup> UCAN Opening Comments at 8-9.

<sup>25</sup> UCAN Opening Comments at 8; Leap Informal Comments at 2-4 (appended to the DWG Report).

3. Third, SoCalGas should be included within the scope of the platform evaluation, to streamline access to natural gas usage data required to support on-bill financing initiatives.<sup>26</sup>

UCAN also supports AEU's recommendations that the process be consolidated with the data systems work scoped in the Demand Response rulemaking (R.25-09-004) and coordinated with the CEC's Load Management Standards rulemaking (26-OIR-01),<sup>27</sup> and to also coordinate with the High DER Future proceeding (R.21-06-017), which is consistent with the cross-proceeding coordination UCAN urged in its Opening Comments.

So structured, the process satisfies Cal Advocates' conditions for platform evaluation. Cal Advocates identifies Recommendation B.a.iv, the cost-effectiveness investigation of alternative data access platforms coupled with comprehensive utility cost disclosure, as among the most important and actionable recommendations in the DWG Report.<sup>28</sup> Cal Advocates prescribes that the proper Commission role at this stage is "record development, not platform development," and it articulates five showings that any platform proposal should satisfy before procurement or ratepayer funding: (1) identification of the specific data access problem and why existing tools or lower-cost changes cannot solve it; (2) definition of data products, users, access rules, update frequency, and privacy and cybersecurity protections; (3) full development, integration, operation, maintenance, governance, and upgrade costs; (4) identification of which existing systems would be replaced or retained and whether ratepayers would pay duplicative costs; and (5) measurable benefits and a method to verify them after implementation.<sup>29</sup> Each of these is satisfied by UCAN's amended proposal. The gap-driven RFI functional requirements and Key Performance Metrics developed by the independent system integrator produce the first

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<sup>26</sup> UCAN Opening Comments at 7.

<sup>27</sup> AEU Opening Comments at 2, 4-5; UCAN Opening Comments at 21.

<sup>28</sup> Cal Advocates Opening Comments at 4-5.

<sup>29</sup> Cal Advocates Opening Comments at 17-18.



and second showings. The comprehensive utility cost disclosure, together with vendor pricing obtained through the RFI, produces the third. The feature-by-feature duplication analysis and AEU's net-of-existing-infrastructure presentation produce the fourth. The benefits evaluation framework, incorporating post-implementation measurement and reporting, produces the fifth. Cal Advocates also distinguishes problems caused by downstream data access tools from problems originating in upstream source systems;<sup>30</sup> UCAN's recommendations would address this concern, by pairing the platform evaluation with independent scoping of any necessary changes to utility back-end systems and enforceable performance standards for existing platforms.<sup>31</sup>

UCAN further observes that Cal Advocates' caution is directed principally at a new statewide public data access platform,<sup>32</sup> a position comparable to UCAN's own. UCAN's Opening Comments stated that a public platform, serving open public access to aggregated data for research and analysis, is not a priority for this proceeding, and that the permissioned data access and interchange functions serving load-serving entities and authorized third parties are distinct.<sup>33</sup> There is accordingly little daylight between UCAN's and Cal Advocates' positions: both would defer any public platform, and both would develop the record on permissioned access now.

On the evidentiary threshold, UCAN endorses AEU's portfolio-wide, net-of-existing-infrastructure framework.<sup>34</sup> A data access platform is shared infrastructure whose value compounds across programs and use cases; a use-case-by-use-case cost-effectiveness test would

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<sup>30</sup> *Ibid.*, at 5.

<sup>31</sup> UCAN Opening Comments at 7-10.

<sup>32</sup> Cal Advocates Opening Comments at 17-18.

<sup>33</sup> UCAN Opening Comments at 18.

<sup>34</sup> AEU Opening Comments at 8-9.

systematically understate its value. UCAN concurs that the showing should be net rather than gross, evaluated against ongoing Green Button Connect costs and concurrent billing modernization and AMI 2.0 investments.<sup>35</sup>

AEU further recommends that the working group evaluate a tiered user-fee structure for commercial and high-volume users, with any fee revenue credited against the platform's ratepayer-funded revenue requirement.<sup>36</sup> UCAN supports that evaluation, with the understanding that fee design and adoption would appropriately occur in a successor phase or proceeding categorized as ratesetting. SBUA makes the complementary points that the evaluation should encompass tangible and intangible benefits, apply a societal discount rate, and consider funding sources beyond ratepayers to the extent the platform functions as a quasi-public good.<sup>37</sup> Cal Advocates' requirement that benefits be measurable and verified after implementation should be incorporated into the benefits evaluation framework.<sup>38</sup> These positions are complementary, and the working group should be directed to develop the cost-benefit methodology on this combined basis. Several of SCE's proposed benefit-cost guidelines can be accommodated within that methodology: incremental analysis relative to existing capabilities is AEU's net-of-existing-infrastructure principle; consistency with the Avoided Cost Calculator is appropriate for valuing DER-enablement benefits; and evidence-based benefit validation is consistent with the New Hampshire and other-state analyses already in the record.<sup>39</sup> UCAN cautions against one element of SCE's framework: a requirement that non-participating customers, defined by reference to

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<sup>35</sup> *Ibid.*

<sup>36</sup> *Ibid.*, at 9.

<sup>37</sup> SBUA Opening Comments at 5-6.

<sup>38</sup> Cal Advocates Opening Comments at 23.

<sup>39</sup> SCE Opening Comments at 17-18. For the prior-implementation evidence, see Leap Informal Comments at 3 & n.1 (appended to the DWG Report) (citing Dunskey Energy + Climate Advisors' benefit-cost analysis of New Hampshire's statewide data platform, identifying \$31 to \$94 million in benefits over a ten-year period); AEU Opening Comments at 5-6 (documenting platform evaluations and benefits frameworks in Illinois, Massachusetts, Maryland, and Texas).

today's participation rates on impaired systems, each receive benefits at least equal to their allocated costs would apply to shared data infrastructure — this is a test the Commission does not apply to other shared infrastructure, and it would embed the status quo's suppressed utilization as the baseline. The appropriate test is the portfolio-wide net benefit showing described by AEU, with allocation and any user-fee structures addressed in a subsequent Phase Three cost phase of this proceeding or a successor proceeding.

**C. The Utilities' Demands for Cost Data and Defined Scope Are Arguments for UCAN's Recommendations, Not Against Them**

SDG&E and SoCalGas oppose recommendations involving statewide platforms and DER registries “until the Commission identifies the specific Joint IOU data elements at issue, the specific validated business needs which drive the recommendations, the system changes required, the implementation timeline, cost recovery certainty, and the customer and ratepayer benefits that justify the cost.”<sup>40</sup> They acknowledge, however, that “[d]etailed cost analysis by the IOUs can only be done when the specific data need has been identified, firm requirements of functionality developed, and cost recovery provided for performing those cost estimates.”<sup>41</sup> UCAN agrees with that acknowledgment. It describes precisely the sequence set forth by UCAN's recommendations in Section II.B above: an RFI to define functionality and obtain vendor pricing, an independent system integrator consultant to define Key Performance Metrics and scope utility-side system changes, and comprehensive utility disclosure of current data system costs.<sup>42</sup> There is no dispute over whether further record development is necessary prior to Commission authorization of implementation here.

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<sup>40</sup> SDG&E/SoCalGas Opening Comments at 4-5.

<sup>41</sup> SDG&E/SoCalGas Opening Comments at 5.

<sup>42</sup> UCAN Opening Comments at 8-9.

Similarly, PG&E “does not oppose continued evaluation of statewide data access improvements,” provided any new platform is assessed against existing and planned utility capabilities and a clear showing of incremental ratepayer benefit.<sup>43</sup> PG&E further suggests that “[a] more efficient approach may be to improve consistency through standardized data elements and application programming interfaces (APIs) that leverage existing heterogeneous IOU systems,” including the Green Button standard.<sup>44</sup> That suggestion describes the very architecture UCAN’s Opening Comments support: an access and permissioning layer, effected through standardized API calls into utility back-end systems, rather than a standalone data warehouse.<sup>45</sup> Whether that layer is best delivered through a third-party statewide platform or through certified, standardized upgrades to the utilities’ own systems is exactly the question the RFI and the Key Performance Metrics are designed to answer. PG&E’s demand that any proposal be compared against its planned Click-Through and Share My Data enhancements, AMI 2.0 capabilities, and NextGen API work<sup>46</sup> is fully accommodated by AEU’s portfolio-wide, net-of-existing-infrastructure framework, which expressly nets the evaluation against ongoing Green Button Connect costs and concurrent billing modernization and AMI 2.0 investments.<sup>47</sup> The Key Performance Metrics serve the complementary function of making PG&E’s promised enhancements verifiable rather than assumed. Finally, PG&E’s assertions that comparable statewide platforms “can be very expensive” and operate at smaller scale rest on PG&E’s stated understanding rather than record evidence.<sup>48</sup> The RFI replaces such assertions, in either direction, with vendor-supplied cost and performance data.

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<sup>43</sup> PG&E Opening Comments at 13.

<sup>44</sup> *Ibid.*, at 15.

<sup>45</sup> UCAN Opening Comments at 7.

<sup>46</sup> PG&E Opening Comments at 13, 19.

<sup>47</sup> AEU Opening Comments at 9.

<sup>48</sup> PG&E Opening Comments at 14.

SCE recommends against new customer-funded data system investments, but the process it proposes in the alternative confirms the reasonableness of UCAN's recommendations. SCE would require a threshold beneficiary determination, a proponent business case, and then a Commission-directed benefit-cost analysis that would itself require "engaging potential vendors through a Request For Information (RFI) or Request For Proposal (RFP) process, conducting initial system design work, and estimating implementation and ongoing costs."<sup>49</sup> The dispute is therefore not over whether an RFI and rigorous benefit-cost analysis should precede any investment decision; every proponent of the platform evaluation agrees that they should. The dispute is over whether the Commission should begin that record development now. SCE has already produced portions of the cost baseline through data requests, reporting over \$23 million in implementation costs since 2013 and approximately \$146,000 per year in combined operation and maintenance costs for its Click-Through and Green Button systems.<sup>50</sup> That disclosure is exactly the comprehensive cost accounting Recommendation B.a.iv contemplates, and it should be formalized on the record for all utilities. UCAN also notes that low ongoing maintenance cost is not, standing alone, a virtue: as summarized in the Introduction, the DWG Report documents sustained performance failures of the systems being maintained.<sup>51</sup> The Key Performance Metrics UCAN has proposed exist precisely to join cost with performance, so that inexpensive systems that do not perform are not treated as the benchmark.

SCE's utilization data deserves the same treatment. SCE reports that only 0.12 percent of residential customers have Green Button authorizations and 2.77 percent have Click-Through authorizations, and states that it "does not know why the number of customer authorizations is so

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<sup>49</sup> SCE Opening Comments at 4-5; see also SCE Opening Comments at 17 (the benefit-cost analysis "would also entail reaching out to vendors via an RFI to gather information on implementation costs").

<sup>50</sup> SCE Opening Comments at 13.

<sup>51</sup> DWG Report at 42-44, 103-105.

low.”<sup>52</sup> The DWG Report offers a documented explanation: authorization failures, single-integrating-agent restrictions, platform outages, inconsistent processes across three utilities, and the absence of any certified Green Button Connect implementation suppress third-party integration and customer uptake.<sup>53</sup> Whether low utilization reflects usability failures or customer disinterest is an empirical question, and the RFI, the Key Performance Metrics, and the benefits frameworks proposed by AEU and Leap are the instruments designed to answer it.<sup>54</sup> SCE’s proposal to resolve the question by assuming disinterest, and its citation of a 97 percent non-participation figure derived from today’s impaired systems,<sup>55</sup> would enshrine the status quo as its own justification.

Two further SCE arguments merit brief responses. SCE warns, citing New York’s Integrated Energy Data Resource budget, that a statewide platform requires substantial utility-side integration investment.<sup>56</sup> UCAN’s recommendations address this risk, pairing the platform evaluation with an independent system integrator consultant to scope and/or provide disciplined review over exactly those utility-side changes — changes that will be required in some measure under any path, including utility-by-utility upgrades.<sup>57</sup> SCE also argues that statewide standards are more likely to prove cost-effective than statewide platforms.<sup>58</sup> This is a false dichotomy on this record. The platform UCAN supports is an enforcement of standards: a certified Green Button Connect implementation with uniform permissioning, interfaces, and data formats across all utilities, which UCAN’s Opening Comments described as “essentially a single implementation of Green Button Connect interfacing across all utilities, certified for compliance

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<sup>52</sup> SCE Opening Comments at 15.

<sup>53</sup> DWG Report at 42-44, 103-105.

<sup>54</sup> AEU Opening Comments at 5-6; Leap Informal Comments at 2-3 (appended to the DWG Report).

<sup>55</sup> SCE Opening Comments at 18.

<sup>56</sup> *Ibid.*, at 13.

<sup>57</sup> UCAN Opening Comments at 8-9.

<sup>58</sup> SCE Opening Comments at 16.

by the Green Button Alliance.”<sup>59</sup> Whether uniform standards are best delivered through a shared implementation or through three separately certified utility implementations is precisely what the RFI and the net cost comparison will reveal. SCE’s preference for incremental, standards-based improvement is an argument within the evaluation UCAN proposes, not against it.

Two specific arguments from SDG&E and SoCalGas warrant a direct response:

First, SDG&E and SoCalGas cite SDG&E’s Click-Through platform, built at a cost of over \$10 million and used by only three third parties, as a caution against assuming that “if a data delivery system is built, it will be sufficiently used to justify its undertaking and costs.”<sup>60</sup> The lesson of that experience supports UCAN’s recommendations. The Click-Through platform was a bespoke, single-utility system built without competitive procurement, without market-defined functional requirements, and without enforceable performance metrics. A third party seeking statewide reach must separately integrate with three different utility systems of uneven quality, and the DWG Report documents that the resulting authorization failures, outages, and latency problems suppress third-party participation.<sup>61</sup> Low utilization of fragmented utility systems is evidence of the coordination failure that a statewide platform is designed to correct. The corrective measures embedded in UCAN’s and AEU’s proposals, including RFI-derived functional requirements, competitive vendor pricing, component-by-component cost comparison, and defined Key Performance Metrics, are the discipline that the Click-Through build lacked.<sup>62</sup>

Second, SDG&E and SoCalGas assert that no party has explained how a statewide platform would ease data gaps, because “[h]ow data is delivered does not at all improve data

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<sup>59</sup> UCAN Opening Comments at 13.

<sup>60</sup> SDG&E/SoCalGas Opening Comments at 5-6.

<sup>61</sup> DWG Report at 42-44, 103-105.

<sup>62</sup> AEU Opening Comments at 7-9; UCAN Opening Comments at 8-9.

quality itself.”<sup>63</sup> PG&E makes a parallel argument, observing that a centralized platform “would not create new underlying data” and would not by itself resolve source-system constraints.<sup>64</sup> These arguments conflate two distinct problems that UCAN’s Opening Comments deliberately addressed on separate tracks. The Statewide Data Platform addresses non-standard permissioning and access processes: divergent authorization procedures, single-integrating-agent restrictions, login and certification failures, and the absence of any certified Green Button Connect implementation. Upstream data quality and latency are addressed separately, through the independent system integrator’s scoping of utility back-end changes and through enforceable performance standards for existing Share My Data platforms.<sup>65</sup> On duplication, AEU correctly observes that a statewide platform “need not result in significant new data infrastructure,” and might consist of a single user interface, shared data quality and timeliness standards, and APIs that connect to each utility.<sup>66</sup> That is the access and permissioning layer UCAN described in its Opening Comments, not a duplicative data warehouse.<sup>67</sup>

#### **D. The DER Registry: Party Alignments Refine UCAN’s Proposal, and the Utilities’ Objections Confirm the Underlying Data Gaps**

Cal Advocates recommends that the Commission conduct a DER data gap assessment before authorizing a registry, identifying what DER data exists today, who holds it, which fields are incomplete or unavailable, what legal or contractual limits apply, and which gaps affect forecasting, planning, program oversight, or reliability.<sup>68</sup> UCAN accepts this refinement and incorporates it: the gap assessment should be the first task of the independent technical

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<sup>63</sup> SDG&E/SoCalGas Opening Comments at 18.

<sup>64</sup> PG&E Opening Comments at 14-15.

<sup>65</sup> UCAN Opening Comments at 7-10.

<sup>66</sup> AEU Opening Comments at 4.

<sup>67</sup> UCAN Opening Comments at 7.

<sup>68</sup> Cal Advocates Opening Comments at 15-16.



consultant that UCAN recommended to advise Energy Division on registry design, schema, update protocols, integration with existing platforms, and a Request for Proposals.<sup>69</sup>

AEU states that it “is supportive of further exploration of a DER Registry that would provide information regarding DER locations and capabilities to participate in various demand programs.”<sup>70</sup> AEU also documents recent state actions: Maryland has ordered its utilities to file draft regulations implementing a central DER Registry, and Illinois utilities have proposed integrated data platforms encompassing DER data.<sup>71</sup> Consistent with AEU’s platform proposal, UCAN recommends that the DER Registry likewise proceed through an implementation-focused working group or steering committee, with defined deliverables and deadlines, integrated with the measures UCAN has already recommended: the independent technical consultant, whose first task would be the DER data gap assessment; design work leveraging the Electric Power Research Institute’s (EPRI) FLEXIT initiative, whose first workstream is the creation of an implementation-ready specification for a universal DER registry,<sup>72</sup> and AEMO’s DER Register precedent;<sup>73</sup> a qualified neutral third-party data steward; and a Request for Proposals pathway. The governance-adaptation evaluation described in Section II.H should extend to the registry working group as well.

CalCCA’s opening comments supply an important design discipline that UCAN endorses. CalCCA reports Piclo’s observation, presented at the June 6, 2026 High DER transmission-distribution coordination workshop, that centralized DER registries without a clear purpose have failed worldwide, and that a registry must provide an incentive, in the form of

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<sup>69</sup> UCAN Opening Comments at 17.

<sup>70</sup> AEU Opening Comments at 2.

<sup>71</sup> *Ibid.*, at 5.

<sup>72</sup> UCAN Opening Comments at 17.

<sup>73</sup> UCAN Opening Comments at 16-17 (citing AEMO’s DER Register reference materials and EPRI’s FLEXIT Supplemental Project Notice, Product ID 3002031278 (May 2025)).

compensation for grid services, to keep data current.<sup>74</sup> This observation validates the two-stage division in UCAN's Opening Comments. The static registry stage proposed for this proceeding has defined purposes and users that do not depend on voluntary data maintenance: automated program enrollment interchange to enforce existing dual-enrollment prohibitions, load forecasting, program design and evaluation, and distribution and transmission planning, populated from interconnection records and program administrator data. The dynamic stage, in which aggregators register assets and maintain current availability data because a Flexibility Market Platform or comparable distribution services procurement mechanism compensates them for doing so, belongs in the High DER Future proceeding, where distribution-level markets are in scope. CalCCA's recommendation that a demand flexibility marketplace host or link to the registry is consistent with this sequencing.<sup>75</sup> No party disputed this division of labor between the proceedings.

Cal Advocates also observes that a registry only organizes or exchanges data and cannot, by itself, produce data that is not collected.<sup>76</sup> UCAN agrees, and the two-stage implementation structure described above reflects exactly that point. The static-stage data exists today and is both fragmented and of questionable quality; tasking a neutral third-party administrator to compile and validate available data resolves those problems. The data that does not exist, principally the attributes and status of DERs that never pass through interconnection, will be produced only when third parties have a commercial reason to register assets, which is the function of the market-linked second stage.

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<sup>74</sup> CalCCA Opening Comments at 11-12.

<sup>75</sup> *Ibid.*, at 7-8, 13.

<sup>76</sup> Cal Advocates Opening Comments at 15.

Lastly, UCAN also notes SBUA’s support, drawing on Derapi’s comments, for a universal-translator approach rather than enforcement of a single universal data standard, which should be evaluated in the consultant’s design work.<sup>77</sup>

The utilities’ objections, by contrast, confirm the need for a unified DER registry rather than undermine it. SDG&E and SoCalGas oppose registry development “unless and until the record identifies the specific data gaps the registry would solve.”<sup>78</sup> The record already identifies those gaps, and the utilities’ own filings confirm them. SDG&E and SoCalGas state that, apart from Rule 21 and Wholesale Distribution Access Tariff interconnections, they “do not generally collect, track or otherwise know the installed capacity of DERs,” including electric vehicles, electric water heaters, and heat pumps.<sup>79</sup> PG&E likewise concedes that registry-related requirements could appropriately address “clearly identified gaps in existing data—such as program participation, aggregation participation, certain operational settings, or improved visibility into electric vehicles.”<sup>80</sup> And in their joint informal comments on the draft DWG Report, the utilities acknowledged that “program enrollment and aggregation participation data are not comprehensively captured today and represent a key area for further evaluation.”<sup>81</sup> These are the gaps the registry is designed to address, in the two stages UCAN proposed.<sup>82</sup>

SCE’s opening comments add two further confirmations. SCE acknowledges that, as the operator of its distribution system, it “should know what DERs are connected to its system,” that it effectively maintains its own registry compiled from different internal systems, and that “this is not a full picture of DERs on SCE’s system,” which may include electric vehicles and other

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<sup>77</sup> SBUA Opening Comments at 4-5.

<sup>78</sup> SDG&E/SoCalGas Opening Comments at 16.

<sup>79</sup> *Ibid.*, at 7.

<sup>80</sup> PG&E Opening Comments at 12.

<sup>81</sup> Joint IOUs’ Comments on the Data Working Group Draft Report (May 15, 2026) at 17.

<sup>82</sup> UCAN Opening Comments at 15-17.

flexible loads installed behind the meter.<sup>83</sup> SCE also raises a legitimate design consideration: market participants may be unwilling to identify their customers to competitors, so a registry “should not be public and would require complex data permissions.”<sup>84</sup> UCAN agrees, and the record already reflects that design. Recommendation B.a.v assigns a qualified neutral third-party data steward responsibility for defining user roles and access levels,<sup>85</sup> UCAN’s response to Question 6(b) expressly distinguished the permissioned registry from any public data product,<sup>86</sup> and the incentive problem SCE identifies is the reason UCAN and CalCCA would link the dynamic registration stage to a Flexibility Market Platform in the High DER Future proceeding, where participants register because (1) they are compensated for grid services and (2) competitively sensitive data is held by a neutral third party platform operator. SCE’s concerns are inputs to the technical consultant’s design work, not grounds for inaction.

PG&E’s proposed alternative, “IOU-hosted, use-case-specific improvements rather than a centralized statewide database,”<sup>87</sup> fails on the terms of the problem the utilities themselves have described. The documented gaps concern visibility across load-serving entities and program administrators: enrollment in non-IOU programs, aggregation participation, and devices that never pass through interconnection. SCE’s own filing illustrates the point: a registry “comprised of different systems” and limited to one utility’s interconnections and programs is the fragmentation to be solved, not the solution. No single utility-hosted system can supply cross-utility, cross-provider visibility, and utility hosting would embed a competitively significant data

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<sup>83</sup> SCE Opening Comments at 9-10.

<sup>84</sup> *Ibid.*, at 10.

<sup>85</sup> DWG Report at 96.

<sup>86</sup> UCAN Opening Comments at 18.

<sup>87</sup> PG&E Opening Comments at 11.

asset within entities that administer competing programs. A neutral third-party data steward, as the DWG Report recommends, avoids both defects.<sup>88</sup>

Finally, as summarized in the Introduction, the record cautions against relying on the quality of the DER data the utilities do hold, absent independent scrutiny. Where independent third parties have been tasked with compiling utility data, they have found that the utilities were not exercising sufficient care in collecting it. In the High DER Future rulemaking, the Phase 1 Electrification Impacts Study found that approximately 80 percent of battery storage asset records in utility interconnection datasets were missing energy ratings.<sup>89</sup> That deficiency came to light only because an independent party compiled and examined the data. Nor is it isolated: UCAN's presentation at the second Future Grid workshop catalogued the deficiencies the same study documented across the utilities' AMI, distribution grid, and DER data holdings, including AMI measurement anomalies and collection gaps, miscoded customer information, feeders missing joins to substation banks, clearly erroneous battery capacity ratings, and interconnection records that could not be matched to premises, meters, or downstream distribution facilities.<sup>90</sup> This experience counsels for assigning registry compilation, data quality standards, and quality assurance to a qualified neutral data steward subject to defined contractual performance requirements, rather than leaving core DER records dispersed across utility-administered systems without independent verification.

**E. The Utilities' Objections to Premises-to-Circuit Mapping (Recommendation C.b.i) Do Not Withstand Scrutiny**

SDG&E and SoCalGas oppose the mapping of customer premises to distribution circuits, feeders, and substations on the grounds that customer addresses are sensitive confidential

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<sup>88</sup> DWG Report at 96; UCAN Opening Comments at 17.

<sup>89</sup> R.21-06-017, Electrification Impacts Study Part 1 at 144, available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M508/K423/508423247.PDF>.

<sup>90</sup> UCAN Workshop 2 Presentation, slides 9-11.

information, and that no business need has been shown because CCAs and local governments do not operate the grid.<sup>91</sup> PG&E argues separately that DER siting information and Integration Capacity Analysis improvements should be addressed exclusively in the High DER Future proceeding.<sup>92</sup> Neither position is persuasive.

On need, CalCCA explains that inaccurate, out-of-date, and missing integration capacity analysis data persistently limits the ability of CCAs and aggregators to deploy DERs strategically, to maximize grid benefits, to lower resource adequacy costs, to reduce customer bills, and to avoid unnecessary grid investments.<sup>93</sup> The DWG Report documents that DER developers and local governments cannot determine which circuit serves a given premise until after submitting an interconnection application, leading to incorrect system sizing and unanticipated costs.<sup>94</sup> An entity need not operate the grid to need locational information about it; it needs that information precisely in order to site resources where the grid operator's own constraints indicate they are most valuable.

On privacy, the DWG Report finds that the mapping does not require disclosure of customer-level consumption data or behavioral information and presents minimal privacy risk.<sup>95</sup> Recommendation C.b.i, moreover, does not require public disclosure of customer addresses or any publicly posted linkage of individual customer premises to their serving circuits. It directs the Commission to continue evaluating constraints and to identify the conditions under which the mapping could be made accessible.<sup>96</sup> Those conditions can include permissioned access for authorized load-serving entities and developers, access controls, and appropriate aggregation, as

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<sup>91</sup> SDG&E/SoCalGas Opening Comments at 10-11.

<sup>92</sup> PG&E Opening Comments at 7-8.

<sup>93</sup> CalCCA Opening Comments at 9.

<sup>94</sup> DWG Report at 99.

<sup>95</sup> DWG Report at 99.

<sup>96</sup> *Ibid.*

UCAN noted in its Opening Comments.<sup>97</sup> The evaluation the recommendation calls for is the venue in which the utilities' security concerns should be addressed, not a reason to forgo the evaluation. As to PG&E's venue argument, Recommendation C.b.i on its face directs continued evaluation and identification of conditions for access, work that can proceed in this proceeding in express coordination with R.21-06-017. Coordination between proceedings is appropriate; deferral that leaves the documented siting information gap unaddressed in either proceeding is not.

**F. The Program Enrollment Data Exchange (Recommendation B.a.vi) Should Be Adopted in This Proceeding and Implemented Through a Single Interface Common to All Utilities**

No party disputes the need for automated program enrollment data interchange to enforce the Commission's existing dual-enrollment prohibitions. SDG&E, SoCalGas, and PG&E all contend that dual participation and supporting systems should remain in the Enhanced Demand Response OIR,<sup>98</sup> and CalCCA observes that Recommendation B.a.vi falls within the scope of the Demand Response proceeding and could be addressed there, while insisting that the Commission must prioritize it.<sup>99</sup> UCAN's position accommodates both observations. The Commission should adopt the requirement and its governance principles in the decision resulting from this Ruling, because the interchange of program enrollment data between utilities and third parties is squarely a data access and interchange rule within Track 2. The decision may then designate the Demand Response proceeding as an implementation venue and direct coordination, so that the requirement is neither relitigated nor deferred.

The implementation directive should include one specification to align with Recommendation B.a.vi. The DWG Report recommends that the exchange be implemented

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<sup>97</sup> UCAN Opening Comments at 11-12.

<sup>98</sup> SDG&E/SoCalGas Opening Comments at 22; PG&E Opening Comments at 5.

<sup>99</sup> CalCCA Opening Comments at 8-9.

“such as through the proposed DER registry or a purpose-built interface, with defined data fields, update frequency, and governance protocols.”<sup>100</sup> Consistent with the coordinated architecture described in Section II.G below, the Commission should explicitly require that the exchange be implemented through a single interface common to all utilities, whether that interface is the DER Registry or a purpose-built interface. Absent that requirement, referral to the Demand Response proceeding invites precisely the outcome the referral is supposed to avoid: the same issue relitigated, followed by three utility-specific enrollment interfaces built to serve the same purpose, continuing the status quo of duplicative utility systems that CCAs and aggregators must separately integrate. A venue designation without a single-interface directive would not resolve the problem; it would replicate it. What ratepayers cannot afford is a venue dispute, or a fragmented implementation, that leaves in place manual, infrequent sharing processes that permit double payment for the same load reduction.<sup>101</sup>

**G. The Opening Comments Collectively Demonstrate That the Statewide Data Platform, DER Registry, and Flexibility Market Platform Must Be Implemented as a Coordinated Architecture**

Several threads in the opening comments converge on an architectural question that no party’s comments address sufficiently. CalCCA emphasizes that the DWG Report’s recommendations must be viewed as complementary to data access efforts in the High DER, Rule 21, Demand Response, and CEC Load Management Standards proceedings, that collaboration across agencies is essential, and that the Commission should identify the proceedings implicated by each recommended action.<sup>102</sup> AEU recommends consolidating the platform process with R.25-09-004 and coordinating with the CEC.<sup>103</sup> The utilities, for their part,

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<sup>100</sup> DWG Report at 96-97.

<sup>101</sup> UCAN Opening Comments at 10-11.

<sup>102</sup> CalCCA Opening Comments at 2-3, 16-17.

<sup>103</sup> AEU Opening Comments at 2, 4-5.



press venue objections that would scatter interrelated functions across proceedings: program enrollment interchange to the Demand Response OIR, DER siting data and market integration to the High DER Future proceeding, and AMI capabilities to utility-specific applications.<sup>104</sup> And SCE, while questioning the registry, asks the right question: how it “would work in practice.”<sup>105</sup> UCAN replies to all of these comments together, because they share a single answer: the Statewide Data Platform, the DER Registry, and the Flexibility Market Platform or comparable distribution services procurement mechanism scoped in the High DER Proceeding are interrelated and mutually reinforcing, and the Commission should plan their implementation as a coordinated architecture rather than as isolated initiatives litigated venue by venue. The DER Registry provides visibility: which assets exist, where they are located, what they can do, and in which programs they are enrolled. The Statewide Data Platform provides permissioned interchange: usage, rate, billing, account, and enrollment data moving between utilities, load-serving entities, and authorized third parties under standardized authorization. The Flexibility Market Platform or comparable mechanism, in scope for the High DER Future proceeding, provides the transactional layer that procures, dispatches, and settles DER services, and it supplies the commercial incentive that expands and keeps the DER Registry data current. Other data access expansions under consideration in this proceeding are elements of the same architecture: the identification of a given customer’s serving circuit (Recommendation C.b.i) and the status of a customer’s program enrollment (Recommendation B.a.vi) are data fields that each of the three platforms must be able to carry, consistently and under common identifiers. UCAN

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<sup>104</sup> PG&E Opening Comments at 5, 7-8; SDG&E/SoCalGas Opening Comments at 22.

<sup>105</sup> SCE Opening Comments at 10.

presented this three-platform architecture in the High DER Future proceeding, most recently at the May 21, 2026 DSO Orchestration Framework Workshop.<sup>106</sup>

Other jurisdictions have recognized the same logic. AEU reports that in Illinois, the utilities themselves have proposed to expand ComEd’s integrated data platform, which would “reconcile individual tools into a single, [Application Programming Interface (API)] for interval, system, DER, and rate data,” into “a more coordinated statewide approach.”<sup>107</sup> That is comparable to the Statewide Data Hub platform / “API of APIs” concept UCAN presented in the High DER Future proceeding: a data interchange API that “starts with certified Green Button Connect 4.0 across IOUs, then evolves into a single API standard for customer usage data, DER data, and grid data shared between DSOs, CCAs, ESPs, aggregators, and CAISO.”<sup>108</sup>

The utilities’ own comments concede the premise of this architecture even as they resist its implication. SCE argues that statewide standards are more likely to prove cost-effective than statewide platforms,<sup>109</sup> and PG&E proposes standardized data elements and APIs leveraging existing utility systems.<sup>110</sup> Both positions accept that these functions must be uniform across the utilities; the remaining dispute concerns only the delivery mechanism, which is what the RFI is designed to test. Cal Advocates likewise warns against authorizing duplicative systems and requires identification of which existing systems a new platform would replace or retain,<sup>111</sup> an analysis that is only possible if the platforms and the related data functions are planned together.

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<sup>106</sup> UCAN, Mass-Market DER Orchestration, presented at the CPUC DSO Orchestration Framework Workshop, R.21-06-017, Track 2 (May 21, 2026) (UCAN DSO Workshop Presentation), slide 4.

<sup>107</sup> AEU Opening Comments at 5.

<sup>108</sup> See R. 21-06-017, CPUC DSO Orchestration Framework Workshop, UCAN: Mass Market DER Orchestration (May 21, 2026), recording at 5:25:43. Available online: <https://www.youtube.com/watch?v=iok0dMjMw9I> See also R.21-06-017, Future Grid Workshop #1, UCAN: Operational Needs for California’s High DER Future (Feb. 8, 2024) (UCAN Workshop 1 Presentation), slides 6-7, available at: [https://gridworks.org/wp-content/uploads/2024/02/UCAN\\_Future-Grid-Workshop-1-Feb.-8-2024-public-final.pdf](https://gridworks.org/wp-content/uploads/2024/02/UCAN_Future-Grid-Workshop-1-Feb.-8-2024-public-final.pdf).

<sup>109</sup> SCE Opening Comments at 16.

<sup>110</sup> PG&E Opening Comments at 15.

<sup>111</sup> Cal Advocates Opening Comments at 17-18, 24.

And SCE observes that cost allocation becomes increasingly complex as systems span multiple utilities and funding sources;<sup>112</sup> that complexity multiplies when the same function is implemented three different ways.

Data access requirements will only expand in a high DER market environment: more device types, more programs, more market participants, more settlement-grade data flows, and more interfaces to CAISO and the CEC. UCAN is concerned that if each expansion is implemented through piecemeal improvements to three separate utility systems, the result will be progressively deeper system fragmentation, unworkable regulatory oversight burdens as each function is litigated utility-by-utility across general rate cases, advice letters, and memorandum accounts, and compounding operational inefficiencies borne by every entity that must integrate with three divergent implementations — all of which results in greater ratepayer costs and decreased benefits.

The Commission faces a critical architectural choice in this proceeding: continue authorizing individual utility system improvements, or investigate the implementation of standardized platforms across the utilities that promote transparency and uniform efficiencies. That choice necessitates coordination across this proceeding, R.25-09-004, R.21-06-017, and the CEC's 26-OIR-01, with clear directives identifying the functions that must not be permitted to evolve differentially across utilities: customer permissioning and third-party authorization; program enrollment data interchange; DER asset registration schemas and identifiers; and the API standards and data formats through which these data are exchanged.

UCAN strongly recommends that the Commission not continue authorizing individual utility system improvements, and instead adopt the substantive requirements in this proceeding

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<sup>112</sup> SCE Opening Comments at 20.

(Recommendations B.a.iv through B.a.vii and C.b.i, together with the 24-hour interval data requirement); convene the implementation-focused working groups for the Statewide Data Platform and the DER Registry described in Sections II.B and II.D, supported by the independent system integrator and technical consultants; direct the RFI within six months, with a defined pathway to a Request for Proposals; issue express coordination directives regarding R.25-09-004, R.21-06-017, and the CEC's Load Management Standards rulemaking, identifying the functions that must remain uniform across utilities; and establish the Phase Three cost phase described in Section II.I.

#### **H. Both Working Groups Should Be Tasked with Governance Structures That Enable Transparent and Nimble Evolution of Data Interchange**

CalCCA's Opening Comments endorse UtilityAPI's caution that the DWG process spanned years while the technology landscape and related proceedings continued to evolve, and UtilityAPI's recommendation to "include recommendations that anticipate ongoing changes and build in mechanisms for continuous feedback and adaptation to changing conditions."<sup>113</sup>

UCAN agrees, and observes that governance design bears directly on the platform architecture question:

- Data interchange administered by a neutral third-party platform operator, under Commission-approved governance with published standards, performance reporting, a representative stakeholder council, and defined change-management processes, can evolve transparently and nimbly as technologies, use cases, and market rules change.
- The current alternative requires each of three utilities to modify its own systems on internal roadmaps that outside parties cannot see, with course corrections available only through backwards-looking regulatory proceedings conducted after deficiencies have accumulated.

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<sup>113</sup> CalCCA Opening Comments at 16-17.

The record summarized in the Introduction, and the thirteen-year history recounted in Section II.A, illustrate the shortcomings of this pathway to-date.

UCAN therefore recommends that the implementation working groups for the Statewide Data Platform and DER Registry should be tasked with evaluating governance mechanisms that provide for continuous feedback and adaptation of data collection and interchange requirements.

**I. The Opening Comments Reflect Substantial Consensus on Cost Allocation Principles and Support UCAN's Proposed Phase Three or Successor Proceeding**

The opening comments converge on cost allocation principles to a degree that should permit the Commission to adopt them without controversy. Cal Advocates, CalCCA, SBUA, SoCalREN, PG&E, SDG&E, and SoCalGas all ground allocation in cost causation and beneficiary-pays principles, with ratepayer funding conditioned on demonstrated, measurable ratepayer benefit.<sup>114</sup> Cal Advocates' requirements that ratepayers bear only incremental, non-duplicative costs and that IOUs provide comprehensive accounts of current data system costs are consistent with UCAN's Opening Comments, which called for the same comprehensive cost accounting precisely so that incremental cost claims can be distinguished from spending the utilities would incur in any event, and for independent validation of proposed utility back-end changes to protect ratepayers from gold-plated or duplicative implementations across separate utility systems.<sup>115</sup> AEU's net-of-existing-infrastructure presentation and proposed evaluation of user-fee offsets complete the framework.<sup>116</sup>

UCAN adds three cautions. First, beneficiary-based fees should be set at levels that encourage, rather than deter, the third-party participation that produces system value. AEU's

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<sup>114</sup> Cal Advocates Opening Comments at 22-23; CalCCA Opening Comments at 15-16; SBUA Opening Comments at 6; SoCalREN Opening Comments at 14-15; SDG&E/SoCalGas Opening Comments at 21; PG&E Opening Comments at 18-19.

<sup>115</sup> Cal Advocates Opening Comments at 22-23; UCAN Opening Comments at 20.

<sup>116</sup> AEU Opening Comments at 8-9.

proposal that the working group evaluate a tiered fee structure accommodates this principle by preserving free access for individual customers and their authorized agents.<sup>117</sup> Second, as CalCCA notes, recovery must be equitable across customer classes and across bundled and unbundled customers.<sup>118</sup> Third, SCE raises a fair design point regarding blended funding: where user fees are part of the revenue model, forecast risk should be allocated deliberately rather than defaulting to utility customers.<sup>119</sup> Fee-structure design and risk allocation are appropriate subjects for a Phase Three or successor proceeding, informed by the cost data the RFI and independent consultant assessment of utility system changes will produce.

Cal Advocates confirms that this proceeding should establish cost allocation principles rather than pre-approve cost recovery.<sup>120</sup> That is consistent with the Scoping Memo's reservation of exact implementation costs and allocation,<sup>121</sup> and with UCAN's recommendation that the Commission establish a Phase Three of this proceeding, or a successor proceeding, coordinated with the High DER Future proceeding, to finalize implementation proposals and assess cost-effectiveness, allocation, and recovery.<sup>122</sup> The record development recommended by UCAN and AEU, including the RFI, the utility cost disclosures, the Key Performance Metrics, and the technical consultant and systems integrator scoping work, should be initiated now so that the cost phase begins with an adequate record.

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<sup>117</sup> *Ibid.*, at 9.

<sup>118</sup> CalCCA Opening Comments at 15.

<sup>119</sup> SCE Opening Comments at 20.

<sup>120</sup> Cal Advocates Opening Comments at 22.

<sup>121</sup> Assigned Commissioner's Scoping Memo and Ruling (May 31, 2023) (Scoping Memo) at 7 ("The exact costs of implementing these data rules and policies and the allocation of these costs will not be examined in Track Two.").

<sup>122</sup> UCAN Opening Comments at 19-20.

### **III. CONCLUSION**

UCAN appreciates the opportunity to provide these Reply Comments and urges the Commission to adopt the recommendations provided herein.

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Respectfully submitted,  
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