

**REGULATORY UPDATE FOR April 22, 2026
(April 15, 2026 – April 21, 2026)**

I. STATE REGULATORY AGENCIES

CALIFORNIA PUBLIC UTILITIES COMMISSION (CPUC OR COMMISSION)¹

Proposed Decisions and Resolutions

None to Report

Voting Meeting

The CPUC will hold a voting meeting in San Francisco, California, on Thursday, April 30, 2026, at 11:00 a.m. PT. The energy-related items on the [agenda](#) are below:

Item 3. Application (A.) 24-06-001 (Application of San Diego Gas & Electric Company for Approval of: (i) Contract Administration, Least-Cost Dispatch and Power Procurement Activities in 2023, (ii) Costs Related to those Activities Recorded to the Energy Resource Recovery Account, Portfolio Allocation Balancing Account, Power Charge Indifference Adjustment Undercollection Balancing Account, Transition Cost Balancing Account, Local Generating Balancing Account, and Modified Cost Allocation Mechanism Balancing Account in 2023, and (iii) Costs Recorded in Related Regulatory Accounts in 2023). This Decision grants, with the modifications, the Application of San Diego Gas & Electric Company (SDG&E) for approval of its Energy Resource Recovery Account Compliance for Record Period 2023. SDG&E, in discussion with the intervenors to this Application, agreed to update its valuation of its Resource Adequacy portfolio, to correct its accounting of its Renewables Portfolio Standard compliance position, and to allocate the revenue from certain battery energy storage systems to a broader set of customers. This Decision adopts those proposed changes. The Decision finds that SDG&E's prudently managed activities resulted in recording a net undercollection of \$214.580 million. Finally, this Decision authorizes SDG&E to recover the stranded costs from its Green Tariff Shared Renewables programs from all ratepayers via the Public Purpose Programs charge.

Item 6. A.24-03-009 (Application of Pacific Gas and Electric Company for Approval Under California Public Utilities (Pub. Util.) Code Section 851 to Lease Entitlements to Transmission Projects to Citizens Energy Corporation). Pacific Gas and Electric Company (PG&E) seeks Commission authorization, under Pub. Util. Code Section 851, to lease entitlements of PG&E transmission projects to a wholly owned subsidiary of Citizens Energy Corporation (Citizens) under the terms and conditions of the Investment Program created by the

¹ Per CPUC Rules of Practice and Procedure Rule 14.3, comments on proposed decisions are due 20 days after issuance of the proposed decision, and reply comments are due five days thereafter. Comments on draft resolutions are due 20 days after the draft resolution appears in the CPUC's daily calendar, per Rule 14.5.

Development, Coordination, and Option Agreement. PG&E also seeks Commission authorization to enter into subsequent second to fifth Option Period Entitlements Leases with Citizens through an expedited Tier 3 Advice Letter process. Finally, PG&E seeks Commission authorization to submit information regarding the executed Entitlement Leases and Citizens' direct bill-paying assistance, estimated to total up to \$450 million over the duration of the five Entitlement Leases, through information-only submittals.

Item 9. Rulemaking (R.) 12-11-005 (Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the California Solar Initiative, the Self Generation Incentive Program and Other Distributed Generation Issues). This Decision dismisses the Joint Petition for Modification of Decision (D.) 15-06-002 filed by the Southern California Tribal Chairmen's Association and Local Government Sustainable Energy Coalition. The Petition seeks to provide an additional six-month extension beyond the three presently authorized, at commercial or government host sites, after the submission of an incentive claim form for the Self Generation Incentive Program and receipt of a conditional reservation letter. According to the Proposed Decision, the relief being sought in the Petition was granted in D.25-12-003, which was adopted by the Commission on December 4, 2025, making the Petition moot.

Item 10. A.24-03-019 (Application of Southern California Edison Company to Establish Marginal Costs, Allocate Revenues, and Design Rates). This Decision addresses Southern California Edison Company's 2024 General Rate Case Phase 2 proceeding. This Decision approves nine settlement agreements: (1) the Marginal Cost and Revenue Allocation Settlement Agreement, (2) the Amended Streetlight and Traffic Control Rate Group Settlement Agreement, (3) the Small Commercial Rate Design Settlement Agreement, (4) the Master Meter Rate Design Settlement Agreement, (5) the Residential Rate Design Settlement Agreement, (6) the Agricultural and Pumping Rate Group Design Settlement Agreement, (7) the Large Power Rate Group Rate Design Settlement Agreement, (8) the Economic Development Rate Settlement Agreement, and (9) the Electric Vehicle Rate Design Settlement Agreement. Additionally, the Decision denies approval of the Vehicle to Grid Rate Proposal Settlement Agreement. And the Decision approves Southern California Edison Company's uncontested proposals.

Item 11. A.24-12-011 (Southern California Gas Company for Authorization to Implement Revenue Requirement for Costs to Enable Commencement of Phase 2 Activities for Angeles Link). This Decision denies the Application of Southern California Gas Company requesting \$266 million of cost recovery from natural gas ratepayers for Phase 2 Activities related to the Angeles Link Project.

Item 14. Resolution E-5417. This Resolution approves with modifications Liberty Utilities (CalPeco Electric) LLC's Advice Letters (AL) 248-E, 248-E-A, and 248-E-B to implement an income-graduated fixed charge (IGFC, fixed charge, Base Services Charge, or BSC) for residential customers pursuant to D.24-05-028 (the Decision) to accelerate the state's clean energy transition.

Item 17. R.25-07-013 (Order Instituting Rulemaking to Improve the California Climate Credit). This Decision orders the investor-owned electric and gas utilities in California (the utilities) to implement immediate changes to the residential electric and natural gas Climate

Credits to improve customer bill affordability. To provide maximum possible affordability relief when bills are highest in 2026, the large electric utilities are ordered to distribute the residential electric Climate Credits in August and September. The small and multi-jurisdictional electric utilities are ordered to distribute the residential electric Climate Credits in October and November, in alignment with their winter peaking season. The gas utilities shall distribute the residential gas Climate Credit in February for the same reason. The utilities shall also update their Climate Credit outreach materials and plans as directed and pursuant to state law. The electric utilities are also directed to implement the transfer of five percent of applicable revenues to the State Treasury to fund the California Transmission Accelerator Revolving Fund, which was established in 2025 to accelerate necessary new electric transmission projects in the state.

Item 31. Rulemaking (R.) 13-02-008 (Order Instituting Rulemaking to Adopt Biomethane Standards and Requirements, Pipeline Open Access Rules, and Related Enforcement Provisions). This Decision addresses many of the outstanding issues within the Rulemaking to Adopt Biomethane Standards and Requirements, Pipeline Open Access Rules, and Related Enforcement Provisions. Of note, this Decision: (1) adopts a Cost Containment Mechanism to protect ratepayers from extreme rate impacts; (2) reduces the overall procurement target set in Decision 22-02-025 from 72.8 billion cubic feet annually to 36.4 billion cubic feet annually; (3) extends both the Diverted Organic Waste procurement target and the overall procurement target to 2035; (4) allows all feedstocks to bid into future Utility solicitations; (5) requires all procurement contracts to be submitted via Tier 2 Advice Letter regardless of contract price; and (6) orders modifications to the gas utilities' draft Renewable Gas Procurement Plans. Collectively, according to the Decision, these modifications aim to create a more streamlined Renewable Gas Standard program while protecting ratepayers from excessive above-market costs.

Item 32. R. 26-XX-XXX (Order Instituting Rulemaking to Refine the Risk-Based Decision-Making Framework for Electric and Gas Utilities). The Commission is initiating this rulemaking to consider ways to strengthen the risk-based decision-making framework that regulated energy utilities use to assess, manage, mitigate and minimize safety risks. The rulemaking will build on requirements for a utility risk framework initially adopted and developed in Application 15-05-002, Safety Model Assessment Proceeding; Rulemaking (R.) 13-11-006, Risk-Based Decision-Making Proceeding; and R. 20-07-013, Order Instituting Rulemaking to Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities.

Upcoming Events

Rule 17 Backbilling Workshop. The Energy Division will host a virtual workshop on May 18, 2026, at 10 a.m. to facilitate the development of an Investor-Owned Utilities and Community Choice Aggregators consensus-based proposal on how to address uncollected revenue from the application of Rule 17 backbilling limitations for both bundled and unbundled customers. An agenda and any additional materials will be distributed closer to the workshop.

CALIFORNIA ENERGY COMMISSION (CEC)

2026 Integrated Energy Policy Report (IEPR) Update

The CEC has set the following preliminary schedule for the 2026 IEPR. The schedule will be available on the 2026 IEPR Update [page](#) and subject to regular updates. The proposed schedule is as follows:

Task/Event	Date
• Final <i>2026 IEPR Update Scoping Order</i> released	April 2026
• Adopt order instituting informational proceeding	May 2026
• Public workshops on specific topics	May-December 2026
• Release draft <i>2026 IEPR Update</i>	October 2026
• Release proposed <i>2026 IEPR Update</i>	January 2027
• Adopt 2026 IEPR Forecast	January 2027
• Adopt <i>2026 IEPR Update</i>	February 2027

The CEC’s 2026 IEPR Update current [workshop schedule](#) (which remains subject to change) is set forth below. According to the workshop schedule, all workshops will be held via Zoom and will run from May through December 2026, as follows:

May 20, 2026: Staff Workshop on Forms & Instructions, 2 p.m.–4 p.m.

June 19, 2026: Commissioner Workshop on Geothermal Energy (Part 1), 10 a.m.–5 p.m.

June 30, 2026: Commissioner Workshop on Energy Equity & Environmental Justice, 1 p.m.–5 p.m.

July 9, 2026: Commissioner Workshop on Geothermal Energy (Part 2), 1 p.m.–5 p.m.

August 20, 2026: Commissioner Workshop on Forecast Inputs and Assumptions, 1 p.m.–5 p.m.

August 31, 2026: Commissioner Workshop on Load Modifier Inputs and Assumptions, 9 a.m.–4:30 p.m.

November 12, 2026: Commissioner Workshop on Load Modifier Draft Results, 10 a.m.–5 p.m.

December 14, 2026: Commissioner Workshop on Overall Forecast Results, 10 a.m.–5 p.m.

Resource Planning and Reliability

On May 4, 2026 from 9:00 a.m. to 5:00 p.m., the CEC will host a [workshop regarding summer energy reliability](#). According to the workshop notice, “the workshop will include an

overview of anticipated summer weather and fire conditions, new clean energy resources expected to come online, hydroelectric resource conditions, and an update on anticipated system reliability conditions for the electricity and fossil gas markets.” Staff from the CEC, California ISO, CPUC, CALFIRE, Western Electricity Coordinating Council, California Department of Water Resources, among others, will be in attendance to provide information regarding anticipated summer conditions. A detailed agenda will be posted to [Docket No. 21-ESR-01](#) prior to the workshop. Written comments are due to the Docket Unit by 5:00 p.m. on May 18, 2026. Additional instructions related to remote attendance and submitting comments is available in the workshop [notice](#).

Demand Side Grid Support (DSGS) Program Guidelines

The CEC announced it will consider the Fifth Edition of the Proposed DSGS Program Guidelines at the April 27, 2026 Business Meeting. The latest proposed changes to the DSGS Program Guidelines are shown in underline/strikethrough text, available [here](#).

Electric Program Investment Charge (EPIC)

On April 2, 2026, the CEC circulated a “Save the Date” for the CEC’s annual EPIC Symposium indicating that the event is scheduled for Tuesday, September 29, 2026, at the California Natural Resources Agency building (715 P Street) in Sacramento, California. More details will be provided when made available by the CEC.

CEC Business Meetings

The next CEC Business Meeting is scheduled for April 27, 2026. The agenda and supporting materials are available [here](#).

MINNESOTA PUBLIC UTILITIES COMMISSION (MPUC)

At its April 9, 2026, agenda meeting, the MPUC met to consider: (1) rescinding approvals of Minnesota Power’s Nemadji Trail Energy Center-related affiliated interest agreements (Docket No. E015/AI-17-568); (2) approval of Otter Tail Power Company’s investments in Distributed Solar Energy Standard Projects (Docket No. E017/M-25-338); (3) approval of Xcel Energy’s Petition for approval of its 2026 Renewable Energy Standard Rider revenue requirements (Docket No. E002/M-25-400); (4) reconsideration of its decision to approve the site permit amendment for the Big Bend Wind Project (Docket No. IP7013-WS-19-619); (5) acceptance of the Certificate of Need application for the Maple River to Cuyuna 345kV Transmission Line Project (Docket No. E015, ET2, E017/CN-25-109); and (6) acceptance of the

Certificate of Need application for the Gopher to Badger Link 765kV High Voltage Transmission Line Project (Docket No. ET3, E002/CN-25-121).

PACIFIC NORTHWEST (OPUC, WUTC, BPA)

Washington Utilities and Transportation Commission (WUTC)

The Washington legislature continues to consider a pair of bills, SB 6171 and HB 2515, although progress on the bills has slowed in recent weeks. The bills would require Emerging Large Energy Use Facilities (ELEUFs) to purchase their energy and pay for needed infrastructure through new tariffs or contracts developed by the state's utilities. Under the bills, starting in 2031, ELEUFs commencing operation after July 1, 2026, must certify to the state that 80% of the energy used to serve their load in the prior year came from renewable or non-emitting resources, and that they purchased the electricity and renewable energy certificates to substantiate that certification in a "single transaction." The laws would require ELEUFs to serve their load using 100% renewable or non-emitting resources beginning in 2035. There has been no movement on SB 6171 in the Senate. Additionally, there have been no developments regarding HB 2515 following its return to the House Rules Committee for a third reading on March 12, 2026.

II. FEDERAL ENERGY REGULATORY COMMISSION (FERC)

FERC to Act on Large Load Interconnection Docket

FERC issued a [statement](#) that it will take action by June 2026 on the Advance Notice of Proposed Rulemaking (ANOPR) proceeding initiated by the U.S. Secretary of Energy. The ANOPR requested the Commission to consider changes to large load interconnection, including increasing demand from data centers.

Branch Street Petition for Review

On April 20, 2026, the owners of Qualifying Facilities (QFs) from [Branch Street](#) filed a [petition for review](#) in the D.C. Circuit asking the court to review FERC's prior order, which found that QFs that fail to timely recertify "may no longer be relied upon" and may be subject to penalties. More on FERC's *Branch Street* order may be found on our client alert [here](#).

American Efficient Penalty Order

FERC issued a [penalty order](#) in its enforcement action against American Efficient, LLC and its affiliated entities in what FERC stated was "one of the largest and most brazen fraud schemes in its history." FERC found American Efficient stole nearly \$500 million from consumers by claiming compensation for fake energy efficiency resources participating in capacity markets. The order directs American Efficient to pay \$722 million in civil penalties and disgorge \$410 million in unjust profits, plus interest.

April 2026 Commission Meeting

FERC held its April 2026 Commission Meeting on April 16. FERC issued the following orders:

- An [order](#) that accepted in part and rejected in part a compliance filing by PJM made in response to a previous order from FERC regarding co-located loads, which found PJM's tariff to be unjust and unreasonable for lacking clarity or consistency to rates, terms, and conditions of service. FERC accepted PJM's revisions that clarify that for interconnection customers seeking to use new generating facilities to serve co-located load: (1) PJM will consider requests for interconnection service below the full generating capability of the generating facility; (2) such customers may use existing procedures to accelerate a new service request if they satisfy the criteria of PJM's tariff; (3) such customers may request Provisional Interconnection Service; and (4) such customers may request Surplus Interconnection Service. FERC also rejected PJM's proposed definition of co-located load and directs PJM to file revisions that revise the definition to use "Point of Interconnection" rather than "Point of Change in Ownership";
- An [order](#) that withdrew a notice of inquiry and terminated a rulemaking proceeding in which the Commission had sought comment on revisions to FERC regulations that would require RTOs or ISOs not to accept bids from aggregators of retail customers that aggregate demand response of customers of utilities that distributed more than 4 million MWh; and
- An [order](#) that withdrew a notice of inquiry and terminated a rulemaking proceeding in which FERC had sought comments on the rate recovery, reporting, and accounting treatment of industry association dues and other expenses.

Electric Transmission Formula Rate Process Workshop

FERC [noticed](#) a workshop on FERC's electric transmission formula rate processes on May 12, 2026, from 9 a.m.–12:30 p.m. ET. FERC stated its workshop will provide a forum for Commission staff, jurisdictional utilities, and transmission formula rate data users to discuss: (1) an overview of the mechanics of transmission formula rates; (2) transmission formula rate implementation protocols; (3) transmission formula rate annual updates; (4) the transmission formula rate audit program; (5) common compliance issues in transmission formula rates; and (6) the Commission's regulatory accounting program.

III. INDEPENDENT SYSTEM OPERATORS (ISO) AND REGIONAL TRANSMISSION ORGANIZATIONS (RTO)

CALIFORNIA INDEPENDENT SYSTEM OPERATOR (CAISO)

Stakeholder Initiatives: Upcoming Meetings and Deadlines

Congestion revenue Rights Enhancements Meeting. CAISO will host a stakeholder meeting for the Congestion Revenue Rights Enhancements initiative on April 22, 2026, from 1 p.m.–5 p.m. The meeting will take place to discuss potential enhancements related to product definition auction efficiency and revenue adequacy.

Day-Ahead Market Enhancements (DAME): Configurable Parameters Implementation Working Group Meeting. CAISO will host a DAME Configurable Parameters implementation working group meeting on April 16, 2026. During this meeting, CAISO will present performance analysis results for the parameter values currently being used in Parallel Operations. Meeting details can be found [here](#). The CAISO is requesting written comments for this working group by end of day, April 24, 2026.

Transmission Development Forum: Updated Transmission Planning Process Workbook. CAISO has posted an [updated Transmission Planning Process \(TPP\) workbook](#). The update corrects errors in submitted in-service dates for some PG&E projects.

Tribal Engagement in Long-Term Transmission Planning. On April 9, the CAISO hosted a meeting for an interagency discussion about opportunities for Tribal government and community engagement in long-term transmission planning.

NEW YORK INDEPENDENT SYSTEM OPERATOR (NYISO)

Short-Term Reliability Report

NYISO published a short-term reliability process report addressing 2026–2030 generator deactivation reliability needs. NYISO noted that recent reports found supply deficiencies from 2026 to 2030 without the completion and energization of planned projects to address these deficiencies. NYISO directed four peaking plants in New York to stay online past their retirement dates until May 1, 2029.

ELECTRIC RELIABILITY COUNCIL OF TEXAS (ERCOT)

Long-Term Forecast Report

ERCOT released a preliminary [long-term forecast](#) from 2026–2032, noting that the current forecast projects approximately 367,790 MW of demand in ERCOT by 2032. ERCOT [stated](#) that its previous all-time peak demand was 85,508 MW on August 10, 2023.