



June 2, 2026

Honorable Chris Ward
California State Assembly
1021 O Street, Suite 6350
Sacramento, CA 95814

Re: AB 1813 (Ward) – Oppose

Dear Assemblymember Ward:

The Public Advocates Office is the independent consumer advocate at the California Public Utilities Commission (CPUC). We advocate for affordable, safe, and reliable utility services consistent with the state's climate and clean energy goals.

We write in respectful opposition to AB 1813, which would undermine affordability goals for ratepayers by preempting the CPUC's ongoing implementation of AB 2316 (Ward, Chapter 350, Statutes of 2022). Californians are struggling with rapidly rising electricity costs. At a time when affordability and ratepayer protections must remain paramount, the Legislature should allow the CPUC to complete its implementation of AB 2316 before intervening to revise or override regulatory determinations that are still being evaluated through an active proceeding involving numerous stakeholder.

AB 2316 required the CPUC to establish a community renewable energy program while also ensuring that any incentives funded through retail electricity rates are "narrowly tailored" to "minimize net costs to nonsubscribing customers." The statute contemplated careful balancing between expanding clean energy access and protecting non-participating customers from unfair rate increases.

In its implementation of AB 2316, the CPUC collected feedback from a wide range of stakeholders, including community solar industry representatives, rooftop solar companies, environmental justice organizations, ratepayer advocates, energy utilities, and other interested parties. In its proceedings, the CPUC evaluated issues involving avoided cost calculations, transmission and distribution benefits, cost allocation, and potential cost shifts to non-participating customers. As outlined in AB 2316, the CPUC is tasked with considering input and feedback from stakeholders on these topics while determining a viable path forward for a community solar program.

The CPUC's April 2026 Proposed Decision (PD) would advance implementation of the Community Renewable Energy Program previously adopted by the CPUC. The PD outlines a path forward that would give low-income customers access to community solar and protect non-participating customers. Importantly, this PD creates timelines for utilities to produce tariffs, along with program implementation and marketing plans for the Community Renewable Energy Program. The PD also implements enhancements for evaluation and funding of existing community solar programs that are targeted to improve access for low-income customers, such as the Disadvantaged Communities-Green Tariff program.

The community solar industry and other opponents of the April 2026 PD have rightly noted that many other states – including New York and Colorado – have implemented regulatory frameworks that would allow for more robust development of community solar. In order to do so, however, these states have authorized sizable subsidy programs, which have resulted in significant costs shifts to non-participating customers. The CPUC has the benefit of observing the challenges of other states' community solar programs and has appropriately prioritized California's statutory requirement to minimize net costs to non-participating customers.

AB 1813 would intervene in the ongoing proceeding by legislatively prescribing outcomes that the CPUC has not yet determined are cost-effective or affordable. This creates substantial risk that Californians who do not participate in these programs – including many working families and individuals who are already burdened by high utility bills – will subsidize projects whose full system benefits remain disputed. The goals of AB 2316 cannot be achieved if the Legislature overrides the CPUC's independent ratemaking expertise before the agency has completed its analysis and implementation efforts.

The Public Advocates Office commends the author's work to advance clean energy solutions, however, those efforts should be implemented in a way that does not exacerbate the state's affordability crisis or shift additional costs onto already overburdened ratepayers.

For these reasons, we respectfully oppose AB 1813.

Sincerely,

A handwritten signature in blue ink that reads "Linda Serizawa". The signature is fluid and cursive, with the first name "Linda" and last name "Serizawa" clearly distinguishable.

Linda Serizawa
Director

