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

Application of Southern California Gas
Company (U 904 G) for Adoption of a
Microgrid Optional Tariff.

Application 25-04-006

(filed April 16, 2025)

MOTION OF SMALL BUSINESS UTILITY ADVOCATES FOR PARTY STATUS

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May 15, 2025



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OF THE STATE OF CALIFORNIA**

Application of Southern California Gas Company (U 904 G) for Adoption of a Microgrid Optional Tariff.

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I. INTRODUCTION

Pursuant to Rule 1.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), Small Business Utility Advocates (“SBUA”) submits the following Motion for Party Status to the *Application of Southern California Gas Company (U 904 G) for Adoption of a Microgrid Optional Tariff* (“Application”) filed on April 16, 2025.

Southern California Gas Company’s (“SoCalGas”) Application seeks to implement the adoption of an optional microgrid tariff for non-residential customers within its service territory. SoCalGas states “the Microgrid Optional Tariff (MOT) is an optional program that would provide eligible existing and prospective non-residential customers in SoCalGas’s territory the opportunity to leverage microgrids to meet their energy needs.”¹

II. SBUA’S BACKGROUND

SBUA’s mission is to represent the utility concerns of the small business community. Small businesses are vital to California’s economic health and constitute an important class of ratepayers for utility companies.² As of 2023, California has approximately 4.1 million small businesses,

¹ SoCalGas Application, p. 1.

² See SBUA website at www.utilityadvocates.org.

which account for nearly half of the state's workforce and play a vital role in the economy.³ Small businesses, as a distinct class of ratepayers, have unique needs that diverge from residential and larger commercial customers. The ability to utilize microgrids are essential for small business customers and non-residential microgrid tariffs are a critical piece of that puzzle.

III. SBUA'S INTERESTS IN THIS PROCEEDING

SBUA intends to participate fully in adjudication of this proceeding to evaluate the merits, risks, and costs of the proposed Microsoft Optional Tariff from the perspective of small commercial customers. SBUA anticipates submitting comments or testimony on the Application, participating in hearings (if necessary), filing legal briefs, submitting comments on any Proposed Decisions, and otherwise contributing to the proceeding.

Small commercial customers have a direct and substantial interest in this proceeding. Many face increased vulnerability to grid outages, long wait times for new electric service, and escalating energy costs, all challenges the proposed MOT aims to address. SBUA's intervention will focus on, but not be limited to, assessing the potential benefits and risks of the proposals, cost recovery mechanisms, and the overall viability of the tariffs for small commercial customers.

SBUA's participation in the current proceeding is a continuation of our active participation in proceedings involving distributed energy resources, resiliency programs, optional tariffs, and microgrid development, including as an intervenor in Rulemaking (R.) 19-09-009 addressing implementation of Senate Bill (SB) 1339.

³ See, e.g., <https://advocacy.sba.gov/wp-content/uploads/2023/11/2023-Small-Business-Economic-Profile-CA.pdf>.

IV . NOTICES

Services of notices, orders, and other communications and correspondence should be directed to the following:

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V. CONCLUSION

SBUA looks forward to engaging with SoCalGas and parties in this proceeding to ensure that non-residential customers are afforded the option of fully and reasonably utilizing microgrids.

Respectfully Submitted,

By: /s/ Jennifer Weberski

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Dated: May 15, 2025