

Regular Meeting of the of the WestLight Energy Board of Directors AGENDA

**Thursday, September 24, 2026
6:30 pm**

Please Note: This meeting will be held in hybrid format with both in-person and Zoom participation options for members of the public.

Meeting Locations:

WestLight Energy Lobby, **2075 Woodside Road, Redwood City, CA 94061**
Los Banos City Hall, Conference Room A, **520 J Street, Los Banos, CA 93635**
Ritz Residence Club, 0075 Prospector Rd, Aspen CO 81611

Zoom, **Virtual Meeting Link:** <https://westlightenergy.zoom.us/j/87496649657>
Meeting ID: 874-9664-9657 **Passcode:** 2075 **Phone:** +1 (669) 444-9171

This meeting of the WestLight Energy Board of Directors will be held at the locations listed above pursuant to the Ralph M. Brown Act (Gov. Code § 54950 et seq.). Board Members are expected to attend in person and may contact General Counsel, Jennifer Stalzer, at jstalzer@westlightenergy.org with questions or accommodation requests. For remote participation information, please see the instructions at the end of the agenda. A video recording of the meeting will be available after the meeting at <https://www.westlightenergy.org/board-of-directors>.

Public Participation

This WestLight Energy Board meeting may be accessed via Zoom using the Zoom login information above. To join by phone, dial +1 (669) 444-9171, enter the Webinar ID and Passcode above. Use the following link to find your local number: <https://westlightenergy.zoom.us/j/kcEsYhLG0p>. WestLight Energy makes reasonable efforts to ensure audio and video quality but cannot guarantee connectivity. Members of the public may attend in person at the locations listed above. Spoken public comments may be made in person or remotely via Zoom. To comment remotely, use the Zoom "Raise Hand" feature or press *6 when joining by phone.

Written public comments may be submitted to Board Clerk, Nelly Wogberg, at nwogberg@westlightenergy.org and should identify the applicable agenda item.

Please note that WestLight Energy Board of Directors meetings are a limited public forum, and all public comment must relate to something that is within the subject matter jurisdiction of the Board. If comments do not relate to the subject matter jurisdiction of the Board, we will stop the comment and move on to the next speaker. General Counsel will assist in identifying comments that are not related to the subject matter jurisdiction of the Board.

ADA Requests

Individuals who require special assistance, a disability-related modification or accommodation, or an alternative format for the meeting or meeting materials should contact Board Clerk, Nelly Wogberg, at nwogberg@westlightenergy.org by 10:00 a.m. on the day before the meeting. Advance notice will enable WestLight Energy to make reasonable arrangements to ensure accessibility to the meeting, related materials, and the opportunity to provide public comment.

Closed captioning is available for all Board meetings. While viewing the meeting in Zoom, please enable captioning.

CALL TO ORDER / ROLL CALL

PUBLIC COMMENT

This item is reserved for public comment on matters within the Board's jurisdiction that are not otherwise on this agenda. Comments on agenda items will be heard when the item is called. Speakers are generally limited to two minutes, subject to adjustment by the Board Chair.

ACTION TO SET AGENDA AND TO APPROVE CONSENT AGENDA ITEMS

1. Approval of Amendment to Agreement with the San Mateo County Department of Sustainability to Add \$25,000 for a Total Not-to-Exceed Amount of \$405,000 with a Term Ending on December 31, 2026
2. Approval of the Revised Memorandum of Understanding Between WestLight Energy and Special District Risk Management Authority (SDRMA)
3. Approval of the Second Comprehensive Legal Services Agreement with Keyes and Fox LLP in an Amount Not-to-Exceed \$500,000 for the Term of May 23, 2026 Through December 31, 2027
4. Approval of Minutes from the July 23, 2026 Board of Directors Meeting

REGULAR AGENDA

5. Chair Report (Discussion)
6. CEO Report (Discussion)
7. Recap of 2026 Legislative Session and Update on Recent Legislative Developments (Discussion)
8. Update on the Relaunch of the Portable Battery Program for Vulnerable Customers Impacted by Power Outages (Discussion)
9. Update on Bay Area Air District Rule 9-6, Zero Emissions of Nitrogen Oxide (NOx) Water Heating Requirements (Discussion)
10. Briefing on the Pescadero Community Microgrid (Discussion)
11. Board Member Reports (Discussion)

INFORMATIONAL REPORTS

12. Data and Technology Department Quarterly Update
13. Energy Supply Procurement Quarterly Update
14. Regulatory Policy Team Quarterly Update
15. Report on California Community Power (CCP) Joint Powers Authority

16. [Social Media FAQ's](#)

17. [Acronym List](#)

ADJOURNMENT

Public records that relate to any item on the open session agenda are available for public inspection. The records are available at the WestLight Energy offices or on the WestLight Energy website at: www.westlightenergy.org.

Instructions for Joining a Zoom Meeting via Computer or Phone

Before You Join

- For the best audio experience, use headphones or earbuds if available.
- If you plan to join from your computer or cell phone, you can use the Zoom app for full audio and video participation or dial in by phone for audio only. We recommend installing the Zoom Workplace application in advance if you plan to use the app: <https://zoom.us/download>.

Option 1 – Join by Computer (Recommended)

1. Click the Zoom webinar link provided on the first page of the agenda.
2. Open the Zoom Workplace application when prompted.
3. Select **Join with Computer Audio**.
4. In a webinar, your camera will be off by default. If you raise your hand to speak during a public comment opportunity, the Board Clerk will typically enable you to turn on your camera.

Option 2 – Join by Computer with Phone Audio

1. Click the Zoom webinar link provided on the first page of the agenda.
2. Open the Zoom Workplace application when prompted.
3. Select **Phone Call** for audio.
4. Dial **+1 (669) 444-9171**.
5. Enter the **Meeting ID**, followed by **#**.
6. Enter your **Participant ID** (displayed in Zoom app) to connect your phone audio.

Option 3 – Join by Telephone (Audio Only)

1. Dial **+1 (669) 444-9171**.
2. Enter the **Meeting ID**, followed by **#**.
3. Press **#** again if prompted for a Participant ID.
4. Enter the **Webinar Passcode**, followed by **#**.

Please note: Participants joining by telephone will be able to hear the webinar but will not be able to view presentations or other shared visual content.



**WestLight Energy
JPA Board Correspondence**

DATE: September 9, 2026
MEETING DATE: September 24, 2026
SPECIAL NOTICE/HEARING: None
VOTE REQUIRED: Majority Vote

TO: Honorable WestLight Energy Board of Directors

FROM: Rafael Reyes, Senior Director of Energy Programs

SUBJECT: Approval of Amendment to Agreement with the San Mateo County Department of Sustainability to Add \$25,000 for a Total Not-to-Exceed Amount of \$405,000 with a Term Ending on December 31, 2026

RECOMMENDATION

Delegate authority to the Chief Executive Officer to execute an Amendment to the Contract with San Mateo County Department of Sustainability to add \$25,000 for a total of up to \$405,000 to provide program analytics support.

BACKGROUND

WestLight Energy's mission is to reduce greenhouse gas (GHG) emissions in its service territory. The County of San Mateo's Department of Sustainability (DOS) has supported local governments in their climate action plan (CAP) efforts through the Regionally Integrated Climate Action Planning Suite (RICAPS) since 2011, providing emissions inventories, business-as-usual forecasts, a CAP document template, a menu of CAP measures with cost-benefit analysis, visualization of emissions data, technical consultation and facilitated collaboration. The RICAPS program has been instrumental in enabling robust and well-aligned climate action plans across the County. Through this program, all 21 agencies in the County have engaged with and received substantive support through the program. These activities were carried out by DOS with consulting support from outside consultants under contract to DOS.

Funding for the initial set of RICAPS tools was from a set of grants from the Bay Area Air Quality Management District. Until 2019, RICAPS was supported by California Public Utilities Commission (CPUC) approved funding from PG&E with matching funds by C/CAG. In 2019 PG&E reduced its funding and WestLight Energy began support for the RICAPS program to ensure the support continued uninterrupted. In 2023 the Board approved a 3-year contract, subsequently extended for a year, for up to \$385,000 to support the program.

DISCUSSION

Staff is seeking approval by the Board for an incremental addition of \$25,000 to the agreement to support additional analytics for use by WestLight and other agencies. The analytics will examine cost-effectiveness of a number of state, regional and WestLight specific programs.

The analysis will draw from publicly available data on CEC and CPUC funded programs as benchmarks to assess WestLight programs in greenhouse gas reduction, program costs, savings (where feasible).

The County will engage their existing consultant who has relevant expertise for this kind of analysis. The results will be used to inform prospective recommendations to bring to the Board as part of an overarching review of WestLight programs intended to be delivered in the coming months.

FISCAL IMPACT

The contract amount is within the existing approved budget.

ATTACHMENTS:

[2026 PCE-SMC RICAP Amendment 2.docx](#)

RESOLUTION NO. _____

**WESTLIGHT ENERGY, COUNTY OF SAN MATEO, AND THE CITY OF LOS BANOS,
STATE OF CALIFORNIA**

**APPROVAL OF AMENDMENT TO AGREEMENT WITH THE SAN MATEO COUNTY
DEPARTMENT OF SUSTAINABILITY TO ADD \$25,000 FOR A TOTAL NOT-TO-EXCEED
AMOUNT OF \$405,000 WITH A TERM ENDING ON DECEMBER 31, 2026**

RESOLVED, by WestLight Energy of the County of San Mateo, and the City of Los Banos, State of California, ("WestLight ") that:

WHEREAS, WestLight Energy was formed as Peninsula Clean Energy on February 29, 2016, and adopted the name WestLight Energy on May 28, 2026; and

WHEREAS, reducing greenhouse gasses to reduce the adverse public wellbeing and economic impacts of climate change is an organizational priority for WestLight Energy; and

WHEREAS, local government programs for climate action planning in San Mateo County have been well served by the County of San Mateo's Regionally Integrated Climate Action Planning Suite (RICAPS) since 2011; and

WHEREAS, local government climate action planning is a critical part of the County's and WestLight Energy's climate strategies, and

WHEREAS, WestLight Energy executed an agreement with Board approval in 2023 and subsequently amended in 2025 providing support for the RICAPS program; and

WHEREAS, the additional scope will provide valuable analytics supporting climate action planning, and

WHEREAS, the Board wishes to delegate to the Chief Executive Officer authority to contract with the County of San Mateo to continue the RICAPS program.

NOW, THEREFORE, IT IS HEREBY DETERMINED AND ORDERED that the Board delegates authority to the Chief Executive Officer to: Finalize and execute an Amendment with the County of San Mateo with terms consistent with those presented, in a form approved by the General Counsel.

**AMENDMENT NO. 2 TO AGREEMENT BETWEEN PENINSULA CLEAN ENERGY AND THE COUNTY
OF SAN MATEO DEPARTMENT OF SUSTAINABILITY**

THIS AMENDMENT TO AN AGREEMENT, is entered into this December 1, 2025, by and between WestLight Energy (formerly Peninsula Clean Energy), a California joint powers authority, hereinafter called "WestLight," and the County of San Mateo, hereinafter called "Contractor".

W I T N E S S E T H:

WHEREAS, the parties entered into an Agreement on April 11, 2023, for the purpose of Contractor's delivery of "RICAPS" climate action planning assistance to San Mateo County and its municipalities ("Agreement"); and

WHEREAS, WestLight and County have determined that it would be mutually beneficial to extend the schedule, during which the work is to be performed so that additional technical assistance for local governments for climate action planning can be provided to support WestLight and County's mission to advance decarbonization; and

WHEREAS, the parties wish to amend the Agreement to increase the contract funding by \$25,000 for a total of \$405,000 for the purpose of providing additional program analytics that support to local governments as described in Exhibit A.

NOW, THEREFORE, IT IS HEREBY AGREED BY THE PARTIES HERETO AS FOLLOWS:

1. The text of Section 3 "Payments" shall be replaced in its entirety with:

In consideration of the services provided by Contractor in accordance with all terms, conditions, and specifications set forth in this Agreement and in Exhibit A, WestLight shall make payment to Contractor based on the rates and in the manner specified in Exhibit B. WestLight reserves the right to withhold payment if WestLight determines that the quantity or quality of the work performed is unacceptable.

In no event shall WestLight's total fiscal obligation under this Agreement exceed three-hundred and eighty thousand dollars (\$405,000).

In the event that the WestLight makes any advance payments, Contractor agrees to refund any amounts in excess of the amount owed by the WestLight at the time of contract termination or expiration.

(revised September 24, 2026)

2. Append the following to Exhibit A "2026 Priorities":

5. Deliver analysis of cost effectiveness of state, regional and WestLight greenhouse gas reduction programs.

3. Except as expressly amended herein, all other provisions of the Agreement and Amendment 1 not in conflict, shall remain in full force and effect.
4. This Amendment No. 1 shall take effect upon the date of execution by both parties.

IN WITNESS WHEREOF, the parties hereto have executed this Amendment as set forth below.

WestLight Energy

By: _____
Shawn Marshall, CEO

Dated: _____

By: _____

Name: _____

Title: _____

Dated: _____



**WestLight Energy
JPA Board Correspondence**

DATE: September 15, 2026

MEETING DATE: September 24, 2026

SPECIAL NOTICE/HEARING: None

VOTE REQUIRED: None

TO: Honorable WestLight Energy Board of Directors

FROM: Jennifer Stalzer, General Counsel, Catherine Hansen, Manager of People and Culture

SUBJECT: Approval of the Revised Memorandum of Understanding Between WestLight Energy and Special District Risk Management Authority (SDRMA)

RECOMMENDATION

Staff recommends that the Board approve adoption of the Revised Memorandum of Understanding (MOU) with Special District Risk Management Authority ("SDRMA" or the "Authority").

BACKGROUND

SDRMA was formed in 1986 in accordance with the provisions of California Government Code 6500 et seq., for the purpose of providing risk financing, risk management programs and other coverage protection programs. WestLight Energy has participated in SDRMA's Health Plans since 2018. At the time of initiation, WestLight Energy signed a Memorandum of Understanding (MOU) with SDRMA. SDRMA's Board of Directors recently adopted amendments to the MOU. These amendments were made to better align the MOU with their pool, Public Risk Innovation, Solutions and Management (PRISM) MOU and with industry norms. In order to continue to participate in Health Plans with SDRMA, WestLight Energy is required to execute and enter into a revised MOU and Resolution in agreement with SDRMA's amendments.

In 2027, WestLight Energy intends to conduct a competitive review process to re-evaluate and select a new benefits administration partner for WestLight Energy. We expect the process to include market research, development and issuance of a competitive solicitation, evaluation of qualified vendors based on established criteria, vendor presentations and due diligence, and negotiation of a new agreement, subject to applicable procurement requirements and Board approval. This process will allow WestLight Energy to evaluate alternatives to the current benefits administrator and seek improved contractual terms, service, technology, and overall value for the agency and its employees.

FISCAL IMPACT

There is no fiscal impact of adopting and signing the MOU.

ATTACHMENTS:

[Resolution - SDRMA Health Benefits & WestLight Energy.doc](#)

[Revised SDRMA Health Benefits MOU 07.30.2026.pdf](#)

RESOLUTION NO. _____

**WESTLIGHT ENERGY, COUNTY OF SAN MATEO, AND THE CITY OF LOS BANOS,
STATE OF CALIFORNIA**

**APPROVAL OF THE REVISED MEMORANDUM OF UNDERSTANDING BETWEEN
WESTLIGHT ENERGY AND SPECIAL DISTRICT RISK MANAGEMENT AUTHORITY
(SDRMA)**

WHEREAS, WestLight Energy, a public agency duly organized and existing under and by virtue of the laws of the State of California (the “ENTITY”), has determined that it is in the best interest and to the advantage of the ENTITY to participate in the Health Benefits Program offered by Special District Risk Management Authority (the “Authority”); and

WHEREAS, the Authority was formed in 1986 in accordance with the provisions of California Government Code 6500 et seq., for the purpose of providing risk financing, risk management programs and other coverage protection programs; and

WHEREAS, participation in Authority programs requires the ENTITY to execute and enter into a Memorandum of Understanding which states the purpose and participation requirements for the Health Benefits Program; and

WHEREAS, all acts, conditions and things required by the laws of the State of California to exist, to have happened and to have been performed precedent to and in connection with the consummation of the transactions authorized hereby do exist, have happened and have been performed in regular and due time, form and manner as required by law, and the ENTITY is now duly authorized and empowered, pursuant to each and every requirement of law, to consummate such transactions for the purpose, in the manner and upon the terms herein provided.

NOW, THEREFORE, BE IT RESOLVED BY THE GOVERNING BODY OF THE ENTITY AS FOLLOWS:

Section 1. Findings. The ENTITY’s Governing Body hereby specifically finds and determines that the actions authorized hereby relate to the public affairs of the ENTITY.

Section 2. Memorandum of Understanding. The Memorandum of Understanding, to be executed and entered into by and between the ENTITY and the Authority, in the form presented at this meeting and on file with the ENTITY’s Secretary, is hereby approved. The ENTITY’s Governing Body and/or Authorized Officers (“The Authorized Officers”) are hereby authorized and directed, for and in the name and on behalf of the ENTITY, to execute and deliver to the Authority the Memorandum of Understanding.

Section 3. Program Participation. The ENTITY’s Governing Body approves participating in the

Special District Risk Management Authority's Health Benefits Program.

Section 4. Severability. If any provision of this resolution or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications of the resolution which can be given effect without the invalid provision or application, and to this end the provisions of this resolution are severable.

Section 5. Other Actions. The Authorized Officers of the ENTITY are each hereby authorized and directed to execute and deliver any and all documents which are necessary in order to consummate the transactions authorized hereby and all such actions heretofore taken by such officers are hereby ratified, confirmed and approved.

Section 6. Effective Date. This resolution shall take effect immediately upon its passage.

RESOLUTION NO. _____

**A RESOLUTION OF THE OF THE (GOVERNING BODY) OF Agency Name
APPROVING THE FORM OF AND AUTHORIZING THE EXECUTION OF A
MEMORANDUM OF UNDERSTANDING AND AUTHORIZING PARTICIPATION IN
THE SPECIAL DISTRICT RISK MANAGEMENT AUTHORITY'S HEALTH BENEFITS
PROGRAM**

WHEREAS, Agency Name, a public agency duly organized and existing under and by virtue of the laws of the State of California (the "ENTITY"), has determined that it is in the best interest and to the advantage of the ENTITY to participate in the Health Benefits Program offered by Special District Risk Management Authority (the "Authority"); and

WHEREAS, the Authority was formed in 1986 in accordance with the provisions of California Government Code 6500 *et seq.*, for the purpose of providing risk financing, risk management programs and other coverage protection programs; and

WHEREAS, participation in Authority programs requires the ENTITY to execute and enter into a Memorandum of Understanding which states the purpose and participation requirements for the Health Benefits Program; and

WHEREAS, all acts, conditions and things required by the laws of the State of California to exist, to have happened and to have been performed precedent to and in connection with the consummation of the transactions authorized hereby do exist, have happened and have been performed in regular and due time, form and manner as required by law, and the ENTITY is now duly authorized and empowered, pursuant to each and every requirement of law, to consummate such transactions for the purpose, in the manner and upon the terms herein provided.

NOW, THEREFORE, BE IT RESOLVED BY THE GOVERNING BODY OF THE ENTITY AS FOLLOWS:

Section 1. Findings. The ENTITY's Governing Body hereby specifically finds and determines that the actions authorized hereby relate to the public affairs of the ENTITY.

Section 2. Memorandum of Understanding. The Memorandum of Understanding, to be executed and entered into by and between the ENTITY and the Authority, in the form presented at this meeting and on file with the ENTITY's Secretary, is hereby approved. The ENTITY's Governing Body and/or Authorized Officers ("The Authorized Officers") are hereby authorized and directed, for and in the name and on behalf of the ENTITY, to execute and deliver to the Authority the Memorandum of Understanding.

Section 3. Program Participation. The ENTITY's Governing Body approves participating in the Special District Risk Management Authority's Health Benefits Program.

Section 4. Severability. If any provision of this resolution or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications of the resolution which can be given effect without the invalid provision or application, and to this end the provisions of this resolution are severable.

Section 5. Other Actions. The Authorized Officers of the ENTITY are each hereby authorized and directed to execute and deliver any and all documents which are necessary in order to consummate the transactions authorized hereby and all such actions heretofore taken by such officers are hereby ratified, confirmed and approved.

Section 6. Effective Date. This resolution shall take effect immediately upon its passage.

PASSED AND ADOPTED this ____ day of _____, 20____ by the following vote:

AYES: _____

NOES: _____

ABSENT: _____

Name

Title

ENTITY Secretary

MEMORANDUM OF UNDERSTANDING

THIS MEMORANDUM OF UNDERSTANDING (HEREAFTER “MEMORANDUM”) IS ENTERED INTO BY AND BETWEEN THE SPECIAL DISTRICT RISK MANAGEMENT AUTHORITY (HEREAFTER “SDRMA”) AND THE PARTICIPATING PUBLIC ENTITY (HEREAFTER “ENTITY”) WHO IS SIGNATORY TO THIS MEMORANDUM.

WHEREAS, on August 1, 2006, SDRMA in its capacity as a member of Public Risk Innovation, Solutions and Management (PRISM) and having executed the Joint Powers Agreement (JPA) governing PRISM, was appointed administrator for the purpose of enrolling small public entities into the (PRISM) Health and/or Employee Benefits Small Group Program (hereinafter "Program"); and

WHEREAS, the terms and conditions of the PROGRAM as well as benefit coverage, rates, assessments, and premiums are governed by the PRISM Health Committee and/or PRISM Employee Benefits Committee for the Program (the "Committee") and not SDRMA; and

WHEREAS, ENTITY desires to enroll and participate in the Program, acknowledging that SDRMA acts solely in an administrative capacity and does not establish Program terms.

NOW THEREFORE, SDRMA and ENTITY agree as follows:

1. **DEFINITIONS.** For purposes of this MEMORANDUM, unless the context otherwise requires, the following terms when capitalized have the respective meanings set out below and are applicable to the singular as well as to the plural forms of such terms and to the masculine as well as to the feminine and neuter genders of such terms.
 - a. “Committee” means the PRISM Health Committee and/or PRISM Employee Benefits Committee for the Program.
 - b. “Coverage Documents” means, except as otherwise provided herein, coverage documents from each carrier outlining the coverage provided, including terms and conditions of coverage, are controlling with respect to the coverage of the Program and will be provided by SDRMA to each ENTITY. Documents will be made available through the online SDRMA Portal and be accessible to approved users of the ENTITY.
 - c. “Program Participation Agreement” means the agreement issued by PRISM/AUS Underwriting to the Entity that details the final terms of acceptance and any special exceptions or terms that have been made a part of the underwriting approval and is required to be completed and executed in order to constitute full acceptance as a member of the PRISM Small Group Program.

d. "Program" or "PRISM" means the Public Risk Innovation, Solutions and Management (PRISM) Health and/or Employee Benefits Small Group Program.

e. "Program Documents" means the following: SDRMA Program Administrative Guidelines, SDRMA Resolution, Program Underwriting application and any required underwriting documents, Program approval, Program Underwriting & Eligibility Rules and Program Participation Agreement.

2. PURPOSE. ENTITY is signatory to this MEMORANDUM for the sole purpose of enrolling in the Program.
3. ENTRY INTO PROGRAM. ENTITY shall apply for participation in the Program by executing and all forms prescribed by SDRMA. SDRMA shall submit the completed forms to the Program's Underwriter who has the authority to accept or reject Entity's application in its sole discretion based on the Program's governing documents and in accordance with the Program's eligibility guidelines.
4. MAINTENANCE OF EFFORT. Program provides health benefits to all active employees, retired employees, dependents of an active or retired employee and public officials of the ENTITY who satisfy requirements for participation. ENTITY public officials may participate in the Program only if they are currently being covered and their own ENTITY's enabling act, plans and policies allow it. ENTITY must contribute at least the minimum percentage required by the eligibility requirements
5. PREMIUMS. ENTITY agrees and acknowledges that premiums and rates for the Program are set by the Committee and that SDRMA's Administrative Fee is set by SDRMA For each billing cycle. ENTITY will remit the total monthly amount billed by SDRMA for each category of participants and the census of covered employees, public officials, dependents and retirees. PREMIUMs are based on a full month, and there are no partial months or prorated PREMIUMs. Enrollment for mid-year qualifying events and termination of coverage will be made in accordance with the SDRMA Program Administrative Guidelines.

Late Payment Penalties. ENTITY shall pay all PREMIUM invoices as billed to SDRMA, regardless of any changes to eligibility or adjustments to PREMIUMS that may occur during the billing month and not reflected in the PREMIUM invoice. SDRMA shall issue PREMIUM invoices to ENTITY prior to the coverage month in which they are due. PREMIUM invoices are due by the due date stated on the invoice and considered delinquent thirty (30) calendar days from the due date. In addition to the outstanding balance due for any unpaid invoice, ENTITY shall be liable to SDRMA for a late payment penalty of 1% of the outstanding balance of any unpaid portion of such invoice effective (30) calendar days after the invoice due date. SDRMA reserves the right to terminate the

MEMORANDUM and ENTITY'S Participation Agreement, including immediate cessation of all services under the Program, any time after it provides written notice to ENTITY of its failure to pay the amount due of any invoice.

6. **BENEFITS.** Benefits provided to ENTITY participants shall be as set forth in ENTITY's Plan Summary for the Program and as agreed upon between the ENTITY and its recognized employee organizations as applicable. Not all plan offerings will be available to ENTITY, and plans requested by ENTITY must be submitted to Program underwriter for approval.
7. **ASSESSMENTS AND DIVIDENDS.** The Program annual premium, as approved by the Committee will be established at a level which is anticipated to provide adequate overall funding. The Program will directly manage surpluses and deficits. Premiums are targeted to fund expected claims (including incurred-but-not-reported (IBNR) and run-out), reinsurance (if any), Program/administrative expenses, and any reserve or margin adopted by the Committee.

If Program funds are insufficient (including funding IBNR), the Committee may impose premium assessments on all applicable participating Entities, consistent with the JPA, including ENTITY signing this MEMORANDUM. Entities that have withdrawn from the Program are liable for assessments attributable to plan year(s) in which they participated.

After appropriate reserves and obligations are funded and any Committee-approved margin is achieved, the Committee may declare a dividend or premium credit, using a formula recommended by the Program Underwriters and actuary.

8. **WITHDRAWAL.** ENTITY may withdraw from this MEMORANDUM and terminate its Program Participation Agreement for a subsequent calendar year subject to the following condition: ENTITY shall notify SDRMA in writing of its intent to withdraw from this MEMORANDUM and terminate its Program Participation Agreement at least 120 days prior to January 1st of the subsequent calendar year in which it shall be effective. No withdrawal shall become effective until December 31 of the year that notice of termination is received. ENTITY may rescind its notice of intent to withdraw and terminate no later than October 1st. Once ENTITY withdraws from the Program, there is a 3-year waiting period to come back into the Program, and the ENTITY will be subject to underwriting approval.
9. **ARBITRATION OF DISPUTES.** To the extent permitted by law, all controversies between the ENTITY and SDRMA that may arise out of or relate to any of the services provided by SDRMA under the MEMORANDUM, or the construction, performance or breach of this or any other agreement between the ENTITY and SDRMA, whether entered into prior to, on or subsequent to the date hereof, shall be settled by binding arbitration in the City of

Sacramento, California, under the Commercial Arbitration Rules of the American Arbitration Association. Judgment upon any award rendered by the arbitrator(s) shall be final and may be entered into any court having jurisdiction.

10. GOVERNING LAW. This MEMORANDUM shall be governed in accordance with the laws of the State of California.
11. VENUE. Venue for any dispute or enforcement shall be in the City of Sacramento, California.
12. ATTORNEY FEES. The prevailing party in any dispute shall be entitled to an award of reasonable attorney fees.
13. COMPLETE AGREEMENT. This MEMORANDUM together with the related Program Documents constitutes the full and complete agreement of the ENTITY.
14. SEVERABILITY. Should any provision of this MEMORANDUM be judicially determined to be void or unenforceable, such determination shall not affect any remaining provision.
15. AMENDMENT OF MEMORANDUM; WAIVER. This MEMORANDUM may not be modified, nor shall any provision hereof be waived or amended, except in a writing duly signed by authorized representatives of SDRMA and ENTITY. The failure of either Party to enforce at any time any provision of the MEMORANDUM shall not be construed to be a waiver of such provision, nor in any way to affect the validity of the MEMORANDUM or the right of either party thereafter to enforce each and every such provision. If ENTITY fails or refuses to execute an amendment to this MEMORANDUM by the deadline included in written notice of SDRMA'S execution of said amendment, SDRMA reserves the right to terminate this MEMORANDUM and ENTITY'S Program Participation Agreement effective as of the next annual renewal date.
16. EFFECTIVE DATE. This MEMORANDUM shall become effective on the later of the first date of coverage for the ENTITY or the last date of signing of this MEMORANDUM by the Chief Executive Officer or Board President of SDRMA and the authorized person for the ENTITY.
17. EXECUTION IN COUNTERPARTS. This MEMORANDUM may be executed in several counterparts, each of which shall be an original, all of which shall constitute but one and the same instrument.

In Witness Whereof, the undersigned have executed the MEMORANDUM as of the date set forth below.

Dated: _____

By: _____

Special District Risk
Management Authority

Dated: _____

By: _____

WestLight Energy



**WestLight Energy
JPA Board Correspondence**

DATE: September 15, 2026

MEETING DATE: September 24, 2026

SPECIAL NOTICE/HEARING: None

VOTE REQUIRED: Majority Vote

TO: Honorable WestLight Energy Board of Directors

FROM: Jennifer Stalzer

SUBJECT: Approval of the Second Comprehensive Legal Services Agreement with Keyes and Fox LLP in an Amount Not-to-Exceed \$500,000 for the Term of May 23, 2026 Through December 31, 2027

RECOMMENDATION

Approval of a comprehensive legal services agreement with the law firm Keyes & Fox LLP (Keyes & Fox) in an amount not-to-exceed (NTE) \$500,000 with a term of May 23, 2026 through December 31, 2027.

BACKGROUND

Since 2016, PCE has worked with Keyes & Fox, a Bay Area law firm that specializes in energy-related matters and has experience in the CCA and utility industry. Keyes & Fox currently provides PCE with legal support for the Regulatory, Programs, and Innovation Strategy teams. Prior to May 2025, each division was governed by its own agreement. At the May 2025 Board meeting, this Board approved a Comprehensive Legal Services Agreement that combined and streamlined the three individual agreements for ease in management of budget and facilitation of legal spend (the First Comprehensive Legal Services Agreement). Under this proposed Second Comprehensive Legal Services Agreement, Keyes & Fox will continue to provide essential legal support regarding PCE's participation in various regulatory proceedings before the California Public Utilities Commission (CPUC), the local Government Solar Initiative (also called GovPV), and finally, WestLight's implementation of advanced energy initiatives. General Counsel and Staff propose to revise and extend the relationship with Keyes and Fox through the Second Comprehensive Legal Services Agreement in the amount of \$500,000 for ongoing legal services.

DISCUSSION

As discussed at the Board of Directors meeting in May 2025, the Comprehensive Legal Services Agreement with Keyes & Fox LLP streamlined and centralized the provision of external legal support for WestLight's specialized energy and regulatory needs for the next year. The comprehensive legal services agreement currently covers three task authorizations that mirror PCE's areas of external legal need: (1) **Regulatory Matters (Task 1)** Over the last

eight years, Keyes & Fox has provided WestLight with broad support with its litigation of complicated regulatory proceedings before the California Public Utilities Commission (CPUC) on topics ranging from PG&E annual Power Charge Indifference Adjustment (PCIA) rate adjustments to PG&E's general rate cases to the Commission's exploration of transportation electrification policy. Keyes & Fox continues to provide WestLight with significant assistance in numerous dockets at the California Public Utilities Commission, the California Energy Commission, the California Air Resources Board and with certain legislative activities. WestLight staff have been very satisfied with the assistance this firm has provided to date. Anticipated not to exceed amount is \$100,000. (2) **GovPV/Local Government Solar, Storage & Electrification (Task 2)** WestLight Energy anticipates continued legal support from Keyes & Fox, with up to \$150,000 allocated for advice on its growing residential and nonresidential (GovPV) solar+storage programs. While PCE staff directly manage most commercial negotiations, Keyes and Fox provides targeted legal expertise—particularly on public agency PPAs and complex regulatory matters—that aids successful execution of contracts. (3) **Innovation Strategy (Task 3)** Innovation Strategy staff require specialized legal support in an amount not to exceed \$200,000 from Keyes & Fox to support WestLight's negotiation of agreements pertaining to the implementation of advanced energy initiatives. Specific tasks include regulatory support, as well as negotiation and drafting of agreements pertaining to the implementation of advanced energy initiatives. The detailed scopes (Task Orders) for each legal task shall be attached to the agreement. Task Orders 1-3 are attached hereto. The total amount of this Agreement (\$500,000) and includes approximately \$122,969 of rollover funds from the prior expired Agreement.

Staff and General Counsel recommend continued streamlining of the agreement with Keyes and Fox into the proposed Second Comprehensive Legal Services Agreement in order to more readily facilitate legal services management and provide clarity regarding specific categories of external legal spend.

FISCAL IMPACT

Approximately \$500,000 of previously budgeted funds, including approximately \$122,969 of rollover funds from the prior Agreement.

ATTACHMENTS:

[K&F-PCE Draft Umbrella Engagement Letter - \(K&F 9-4-26 Final\).docx](#)

[K&F - Westlight Task Authorization 1 - Regulatory \(K&F 9-4-26 Final\).docx](#)

[K&F - Westlight Task Authorization 2 Gov PV \(K&F 9-4-26 Final\).docx](#)

[jsK&F - WestLight Task Authorization 3 - Innovation Strategies \(K&F 9-4-26 Final\).docx](#)

RESOLUTION NO. _____

**WESTLIGHT ENERGY, COUNTY OF SAN MATEO, AND THE CITY OF LOS BANOS,
STATE OF CALIFORNIA**

**APPROVAL OF THE SECOND COMPREHENSIVE LEGAL SERVICES AGREEMENT WITH
KEYES AND FOX LLP IN AN AMOUNT NOT-TO-EXCEED \$500,000 FOR THE TERM OF
MAY 23, 2026 THROUGH DECEMBER 31, 2027**

RESOLVED, by Westlight Energy of the County of San Mateo, and the City of Los Banos, State of California, ("Westlight") that:

WHEREAS, WestLight Energy was formed as Peninsula Clean Energy on February 29, 2016, and adopted the name WestLight Energy on May 28, 2026; and

WHEREAS, WestLight Energy's Regulatory, Programs, and Innovation Strategy teams require specialized legal assistance from Keyes and Fox LLP; and

WHEREAS, WestLight Energy previously contracted with Keyes and Fox LLP for regulatory support, the Local Government Solar Initiative (GovPV), and Distributed Energy Resource Management System (DERMS), respectively; and

WHEREAS, in May 2025, this Board approved a \$351,000 agreement for comprehensive legal services with Keys and Fox for a term of May 22, 2025 through May 22, 2026; and

WHEREAS, the proposed Second Comprehensive Legal Services Agreement will provide additional needed legal expertise by Keyes and Fox for the term of May 23, 2026 through December 31, 2027; and

WHEREAS, staff, in consultation with the General Counsel, have determined that further streamlining external legal services through the Second Comprehensive Legal Services Agreement with Keyes and Fox will more readily facilitate legal services management and provide clarity and transparency regarding specific categories of external legal spend; and

WHEREAS, the total not to exceed amount for the proposed Second Comprehensive Legal Services Agreement is \$500,000 for the term May 23, 2026 to December 31, 2027; and

NOW, THEREFORE, IT IS HEREBY DETERMINED AND ORDERED that the Board delegates to the Chief Executive Officer authority to enter into a Second Comprehensive Legal Services Agreement with Keyes and Fox, LLP for specialized legal services in a form approved by the General Counsel in an amount not to exceed \$500,000 for the term of May 23, 2026 to December 31, 2027.

September [X], 2026

Shawn Marshall
Chief Executive Officer
WestLight Energy
2075 Woodside Rd.
Redwood City, California 94061

Re: Keyes & Fox - WestLight Energy Umbrella Engagement Letter

Dear Ms. Marshall,

We are pleased WestLight Energy (“WestLight”) has decided to continue to retain Keyes & Fox LLP (“Keyes & Fox”) to represent WestLight (a) in regulatory proceedings at the California Public Utilities Commission (the “Regulatory Matters”) and (b) transactional matters (the “Transactional Matters”) ((a) and (b) collectively referred to herein as the “Legal Services”). We thank you for this opportunity to work on your behalf.

This letter replaces in their entirety all prior engagement letters between WestLight and Keyes & Fox, including that specific “Keyes & Fox - Peninsula Clean Energy Authority Umbrella Engagement Letter” dated May 22, 2025 and fully executed on June 16, 2025.

This letter describes the basis of the attorney-client relationship between Keyes & Fox and WestLight, along with an explanation of how Keyes & Fox will bill for its Legal Services. We believe that it is beneficial to the attorney-client relationship to develop a clear understanding of our billing and engagement policies upfront.

1. Scope of Keyes & Fox’s Representation

Pursuant to this engagement letter, Keyes & Fox agrees to represent WestLight as its client with regard to the Legal Services described above. The known scope of work for each Legal Service (“Task Authorization”) is described in the specific tasks executed by Keyes & Fox and WestLight and included in Attachment A hereto (“Open Task Authorizations”). As the Legal Services proceed, completed Open Task Authorizations will be closed. Additional Task Authorizations may be executed upon Keyes & Fox and WestLight’s mutual, written agreement.

Keyes & Fox will do its utmost to serve WestLight effectively, provide Legal Services in an efficient manner, and respond promptly to WestLight’s inquiries.

We have run a conflicts check as it relates to the proposed Legal Services, and we have not found any direct conflicts with undertaking them. If a conflict arises that may impact our ability to provide WestLight with effective representation, we will promptly bring that conflict to WestLight’s attention. If you are concerned about any relationship we might have with particular companies, organizations or individuals, please bring those concerns to our attention.

2. Confidentiality

Generally, it is in WestLight's interest to preserve confidentiality of all communications with Keyes & Fox. Keyes & Fox work product related to the Legal Services is not intended for use with third parties. If WestLight discloses any of our communications, it jeopardizes the privileged nature of the communications, so we believe it is advisable that WestLight take care not to disclose privileged information or Keyes & Fox work product to third parties.

Through this Engagement Letter, WestLight authorizes K&F to engage in confidential communications with EQ Research, LLC to obtain administrative support with respect to the Legal Services. K&F understands it is the intent of WestLight that all communications and work product that are developed by, or shared with, EQ Research LLC related to the Legal Services shall be confidential and subject to attorney-client privilege.

3. Fees, Expenses and Invoicing

By signing this engagement letter, WestLight agrees to pay Keyes & Fox for time and out-of-pocket expenses according to the terms set forth below.

a. Professional fees

Keyes & Fox will keep an hourly total of any time spent on the Legal Services. Work will be performed at hourly rates according to the rates set forth in Attachment B to this engagement letter, which is incorporated by reference herein. Attachment B lists those persons we anticipate may work on the Legal Services. In addition to the K&F attorneys listed in Attachment B, the assistance of other K&F attorneys and/or EQ Research, LLC staff may be enlisted from time to time as determined necessary for the provision of the Legal Services.

It is Keyes & Fox's policy to adjust hourly rates for all attorneys and staff at the beginning of the calendar year. Historically, rate increases have been between 5-8% per year. Rates quoted in Attachment B are 2026 rates. Our firm's practice is to charge for travel time, as discussed in Attachment B.

Tim Lindl will be the lead Keyes & Fox attorney working with WestLight in connection with the Regulatory Matters. Mr. Lindl may utilize the services of other Keyes & Fox attorneys and non-attorney professionals in connection with this matter. By agreeing to this engagement letter, WestLight consents in writing to Mr. Lindl serving as the lead attorney in this matter and to Mr. Lindl's assignment of work on this matter to any of the other Keyes & Fox team members.

Sheridan Pauker will be the lead Keyes & Fox attorney working with WestLight in connection with the Transactional Matters. Ms. Pauker may utilize the services of other Keyes & Fox attorneys and non-attorney professionals in connection with this matter. By agreeing to this engagement letter, WestLight consents in writing to Ms. Pauker serving as the lead attorney in this matter and to Ms. Pauker's assignment of work on this matter to any of the other Keyes & Fox team members.

Of Counsel attorneys identified in the Rates for Attorneys provided in Attachment B are neither partners nor associates of Keyes & Fox. A portion of any legal fees billed by Keyes & Fox may be divided and paid to them. By agreeing to this engagement letter, you consent in writing to a division of fees with the firm's Of Counsel attorneys.

At no time shall the Open Task Authorizations authorized under this letter exceed five hundred thousand dollars (\$500,000) in total (the "Total DNE"). Unless otherwise agreed to in writing, WestLight will not be obligated for fees in excess of the Total DNE.

Each individual Task Authorization in Attachment A has an "Task Effective Date" upon which the Legal Services described therein begin and a "Task Expiration Date" upon which the Task Authorization expires (the "Task Authorization Term"). This letter authorizes payment of fees of up to the "Do Not Exceed Amount" specified for each Task Authorization in Attachment A during the Task Authorization Term. Unless otherwise agreed to in writing, WestLight will not be obligated for fees in excess of the Do Not Exceed Amount for each individual Task Authorization set forth in Attachment A during the Task Authorization Term. WestLight and K&F will review these not-to-exceed amounts upon the occurrence of a request from either WestLight or K&F for such a review.

b. Expenses

Expenses may be incurred in performing legal services as part of your engagement. You agree that WestLight shall be responsible for payment of all costs, disbursements, and expenses paid by Keyes & Fox, in addition to our hourly fees. Costs and expenses include messenger and other delivery fees, copying and reproduction costs, costs for travel including mileage and parking, computerized legal research, and other similar expenses. Expenses will be billed at actual cost.

c. Invoices and payments

We invoice our clients monthly. Our invoices are due and payable within 30 days, unless other arrangements have been agreed to in writing in advance. Typically, invoices will list the matter worked on and provide information on the dates of service, time involved, Keyes & Fox team member responsible and activity undertaken. We will use our best efforts to respond to requests for special invoice formats. Any unpaid amounts after sixty (60) days will accrue interest at a rate of five percent (5%) per annum, provided that Keyes & Fox shall give WestLight notice of Keyes & Fox's intent to charge such interest thirty (30) days before any accrual begins.

4. Termination of Keyes & Fox's Representation

Either WestLight or Keyes & Fox may terminate Keyes & Fox's representation of WestLight at any time and for any reason. At the time Keyes & Fox's representation of WestLight concludes, all unpaid fees and costs for Keyes & Fox's Legal Services become due and payable. If at that time, WestLight does not request the return of its file, Keyes & Fox will retain WestLight's file for a period of three (3) years, after which Keyes & Fox may have the file destroyed.

5. Miscellaneous

This letter is the entire agreement between WestLight and Keyes & Fox concerning the provision of Legal Services. This agreement and the scope of Legal Services provided under it may be amended from time to time by mutual agreement. California law will govern this agreement and any subsequent amendments.

Nothing in this agreement should be construed as a promise or guarantee about the outcome of any matter which Keyes & Fox is handling on WestLight's behalf. Our comments about the outcome of WestLight's matters are expressions of opinion only. If Keyes & Fox should provide WestLight with an estimate of the fees and costs which may be incurred in connection with our representation of WestLight, it is important that WestLight understand and acknowledge that any such estimate is merely an estimate based on numerous assumptions, which may or may not prove to be correct and that any estimate is not a guarantee or agreement of what the maximum amount of fees and/or costs will be.

Generally, Keyes & Fox does not update our clients about changed circumstances or changes in the law after our work on a matter is completed. Please let Mr. Lindl know if WestLight wants Keyes & Fox to assume this responsibility so that appropriate arrangements can be made.

6. Conclusion

If the terms of Keyes & Fox's representation of WestLight as explained in this letter are satisfactory, please execute a copy of this letter as indicated and return it to me. Please feel free to contact us if you have any questions or concerns.

We look forward to working with you.

Sincerely,

Tim Lindl, Partner

Keyes & Fox LLP

Sheridan Pauker, Partner

Keyes & Fox LLP

WestLight hereby authorizes K&F to represent its interests with respect to the Legal Services. WestLight acknowledges, by signing this letter, that it has had the opportunity to consult with other counsel about the consequences of this engagement and that K&F recommends that you do so. By signing this letter, WestLight affirms that it understands and agrees to the terms set forth in this letter. This agreement will not take effect, and Keyes & Fox will have no obligation to provide Legal Services, until WestLight returns a signed copy of this letter.

I have read the foregoing letter, understand it and agree to it on behalf of WestLight.

By: _____

Shawn Marshall, Chief Executive Officer
WestLight Energy

Date: _____

Attachment A

**Task
Authorizations**

Attachment B**2026 Hourly Rate Sheet****KEYES & FOX LLP**
ATTORNEYS**Hourly Rate**

Kevin Fox	\$680
Jason Keyes	\$450
Tim Lindl	\$525
Jake Schlesinger	\$490
Scott Dunbar	\$440
Sheridan Pauker	\$545 ⁺ / \$520
Mark Valentine	\$430
Beren Argetsinger	\$405
Nikhil Vijaykar	\$460
Julia Kantor	\$450
Theresa Cho	\$645
Ann Springgate	\$420
Grant Snyder	\$360
Alexandra Haggarty	\$430
Alissa Greenwald	\$340
Gonzalo Rodriguez	\$400
Yonatan Moskowitz	\$400
Nathan Carrier	\$350

EQ RESEARCH, LLC RATES

Miriam Makhyoun	\$270
Justin Barnes	\$250
Jason Hoyle	\$200
Alicia Zaloga	\$170
Riana Ackley	\$160
Heather DePouw	\$160
Seth Brown	\$150
Nikhil Tyagi	\$150
Corey Cochran	\$130
Rob Campbell	\$130
Eleanor Tyson	\$130

+ Rates with a plus sign are transactional/compliance rates

Travel Policy: Unless special arrangements are made, travel time is billed at the full hourly rate. Every effort will be made to work productively on WestLight matters during travel. If work is performed for another client during travel, WestLight will not be billed for that time. All reasonable travel expenses are billable – hotel, airfare, car rental, meals, taxi, public transit, etc.

Work Policy: Reasonable time for filing and service is billed at regular billable rates.

Miscellaneous Expenses Policy: Expenses for postage, photocopying, printing, faxing and other minor expenses directly related to a matter are billable at cost to WestLight.

TASK AUTHORIZATION 1 – Regulatory

Task Authorization Effective Date: May 23, 2026

Task Authorization Description: Regulatory Dockets

Keyes & Fox LLP (Keyes & Fox) and WestLight Energy (WestLight) agree that this Task Authorization will be governed by the terms and conditions of that specific “Keyes & Fox – Westlight Energy Authority Umbrella Engagement Letter” dated September [X], 2026, as amended from time to time.

Scope of Services

Keyes & Fox will provide legal representation of WestLight in regulatory proceedings at the California Public Utilities Commission (Commission) that we both mutually agree to undertake, including but not limited to review of an Order Instituting Rulemaking (R.) or application; review of the scoping ruling(s); collaboration with WestLight and other community choice aggregators or their trade associations, as applicable, to identify potential issues; issuance of discovery requests; preparation of pleadings such as comments, testimony, briefing, and motions practice; preparation for and participation in any prehearing and status conferences; preparation for and participation in evidentiary hearings; preparation for and participation in *ex parte* meetings and meetings with Commission staff; analysis of a final decision; and consideration of the potential for appeal.

Such representation will include the Commission’s R.25-04-010 in 2025 as the successor rulemaking to the previous energy efficiency rulemaking. The scope of the Energy Efficiency rulemaking includes issues related to Energy Efficiency Potential and Goals, Guidance for the 2026 Portfolio Applications, Viable Electric Alternatives Policy, Multifamily Programs and Policy, and Community Choice Aggregator (CCA) Elect-to-Administer Budgets and Policy. Keyes & Fox will represent WestLight Energy in this proceeding and seek to advance WestLight's energy efficiency-related priorities and interests. The submissions in this docket will largely consist of drafting comments and reply comments on rulings from the Administrative Law Judge, responses to Staff proposals, responses to discovery requests, and comments and reply comments on proposed decisions. Keyes & Fox and WestLight will focus in particular on scoping issues that impact WestLight’s application to administer energy efficiency programs in Application (A.) 26-03-009 et al.

Such representation will also include the Commission Resolution approving WestLight's request to renew its Elect to Administer Energy Efficiency Plan on January 20, 2026 (Resolution E-5442). Keyes & Fox attorneys assisted WestLight with its preparation of that request, and will continue to assist WestLight with matters arising from its Elect to Administer Plan (consisting of a single program - the FLEXMarket program). Keyes & Fox's assistance may include legal research and advice, in particular as it relates to the interaction between WestLight's Elect to Administer Plan and the EE Rulemaking (R.25-04-010) and WestLight's Application for approval of a four-year Business Plan and Energy Efficiency Portfolio Plan in A.26-03-009 et al.

Such representation will also include A.24-10-014, Pacific Gas & Electric Company’s Billing Modernization application, in which WestLight participates with a group of CCAs under a Joint Representation Agreement. Participation in this proceeding has and will continue to include to

identifying potential issues; issuance of discovery requests; preparation of pleadings such as comments, testimony, briefing, settlement agreements and motions practice; preparation for and participation in any prehearing and status conferences; preparation for and participation in evidentiary hearings; preparation for and participation in *ex parte* meetings and meetings with Commission staff; analysis of a final decision; and consideration of the potential for appeal.

Task Authorization Expiration Date: June 30, 2027

Task Authorization Do-Not-Exceed Amount: This Task Authorization includes a total budget **not to exceed one-hundred thousand dollars (\$100,000).**

Name:

Name: Tim Lindl

Title:

Title: Partner, Keyes & Fox LLP

Signature: _____

Signature: _____

Date:

Date:

TASK AUTHORIZATION 2 – Local Government Solar, Storage & Electrification, and Residential Solar & Storage

Task Authorization Effective Date: May 23, 2026

Keyes & Fox LLP (K&F) and WestLight Energy (WestLight) agree that this Task Authorization will be governed by the terms and conditions of that specific “Keyes & Fox – WestLight Energy Authority Umbrella Engagement Letter” dated September [X], 2026, as amended from time to time.

Scope of Services

Description: legal advice, drafting and negotiation of agreements pertaining to WestLight’s development of photovoltaic, battery energy storage systems and electrification infrastructure on WestLight customer property. This includes the negotiation and drafting of the engineering, procurement and construction (EPC) agreement, associated energy services agreements, and any other supporting agreements, approvals, and legal analyses, including support related to financial partnerships.

Task Authorization Expiration Date: December 31, 2027

Task Authorization Do Not Exceed Amount: This Task Authorization 2 includes a total budgeted not-to-exceed amount of \$150,000.

Name:

Name: Sheridan Pauker

Title:

Title: Partner, Keyes & Fox LLP

Signature: _____

Signature: _____

Date:

Date:

TASK AUTHORIZATION 3 – Innovation Strategies

Task Authorization Effective Date: May 23, 2026

Keyes & Fox LLP (K&F) and WestLight Energy (WestLight) agree that this Task Authorization will be governed by the terms and conditions of that specific “Keyes & Fox – Westlight Energy Authority Umbrella Engagement Letter” dated September [X], 2026, as amended from time to time.

Scope of Services

Provide legal advice, regulatory support, and drafting and negotiation of agreements pertaining to the implementation of advanced energy initiatives under WestLight’s Innovation Strategy department. Examples include the development of contracts for a Distributed Energy Resource Management System (DERMS), support for the energy efficiency Application A.26-03-021, consolidated into A.26-03-009 et al. with the California Public Utilities Commission, and contracting support on developing community microgrids.

Task Authorization Expiration Date: June 30, 2027

Task Authorization Do Not Exceed Amount: This Task Authorization 3 includes a total budgeted not-to-exceed amount of \$200,000.

Name:

Name: Sheridan Pauker

Title:

Title: Partner, Keyes & Fox LLP

Signature: _____

Signature: _____

Date:

Date:



**WestLight Energy
JPA Board Correspondence**

DATE: August 28, 2026
MEETING DATE: September 24, 2026
SPECIAL NOTICE/HEARING: None
VOTE REQUIRED: Majority Vote

TO: Honorable WestLight Energy Board of Directors
FROM: Nelly Wogberg, Board Clerk
SUBJECT: Approval of Minutes from the July 23, 2026 Board of Directors Meeting

RECOMMENDATION

Approval of Minutes from the July 23, 2026 Board of Directors Meeting.

ATTACHMENTS:

[07-23-2026 BOD Draft Minutes.pdf](#)



Regular Meeting of the WestLight Energy Board of Directors Minutes

Thursday, July 23, 2026
6:30 p.m.
Zoom Video Conference and Teleconference

[CALL TO ORDER](#)  [YouTube](#)

Meeting was called to order at 6:36 p.m. in virtual teleconference, in the WestLight Energy Authority lobby and in the Los Banos City Hall conference room A.

[ROLL CALL](#)  [YouTube](#)

Participating:

Jasneet Sharma, San Mateo County
Tom McCune, Belmont
Coleen Mackin, Brisbane, participating remotely with a "just cause" exemption
Donna Colson, Burlingame, arrived at 7:16 p.m.
Martha Barragan, East Palo Alto, participating remotely with a "just cause" exemption
Patrick Jonsson, Half Moon Bay
Leslie Ragsdale, Hillsborough, *Vice Chair*
Michael Amabile, Los Banos, participating from Los Banos, arrived at 6:39 p.m.
Betsy Nash, Menlo Park
Anders Fung, Millbrae
Christine Boles, Pacifica
Craig Taylor, Portola Valley
Elmer Martinez Saballos, Redwood City
Marty Medina, San Bruno, *Chair*
Adam Loraine, San Mateo
James Coleman, South San Francisco

Absent:

Noelia Corzo, San Mateo County
Rick DeGolia, Atherton
Ken Gonzalez, Colma
Roderick Daus-Magbual, Daly City
Stacy Jimenez, Foster City
John Dugan, San Carlos
Hassan Aburish, Woodside

A quorum was established.

PUBLIC COMMENT

None

ACTION TO SET THE AGENDA AND APPROVE REMAINING CONSENT AGENDA ITEMS



Public Comment: None

MOTION: Director Loraine moved, seconded by Director Boles to set the Agenda, and approve Agenda Item Numbers 1-3.

1. Approval of WestLight Energy's 2025 Power Source Disclosure Annual Report
2. Approval authorizing the Chief Executive Officer to Negotiate and Enter into Furniture Purchase Agreements with Various Vendors in an Amount Not-to-Exceed \$400,000
3. Approval of the Minutes for the June 25, 2026 Meeting

MOTION PASSED: 15-0 (Absent: San Mateo County, Atherton, Burlingame, Colma, Daly City, Foster City, San Carlos, Woodside)

JURISDICTION	BOARD MEMBER	YES	NO	ABSTAIN	ABSENT
San Mateo County	Director Corzo				X
San Mateo County	Director Sharma	X			
Atherton	Director DeGolia				X
Belmont	Director McCune	X			
Brisbane	Director Mackin	X			
Burlingame	Director Colson				X
Colma	Director Gonzalez				X
Daly City	Director Daus-Magbual				X
East Palo Alto	Director Barragan	X			
Foster City	Director Jimenez				X
Half Moon Bay	Director Jonsson	X			
Hillsborough	Director Ragsdale	X			
Los Banos	Director Amabile	X			
Menlo Park	Director Nash	X			
Millbrae	Director Fung	X			
Pacifica	Director Boles	X			
Portola Valley	Director Taylor	X			
Redwood City	Director Martinez Saballos	X			
San Bruno	Director Medina	X			
San Carlos	Director Dugan				X
San Mateo	Director Loraine	X			
South San Francisco	Director Coleman	X			
Woodside	Director Aburish				X
	Total	15			8

REGULAR AGENDA

4. [Chair Report \(Discussion\)](#)

Chair Medina gave a report including an update on the Bay Area Air District water heater vote, upcoming goals for the CEO's FY 2027 goals, and an upcoming ribbon cutting on July 29th.

Public Comment: None

5. [CEO Report \(Discussion\)](#) [YouTube](#)

Shawn Marshall, Chief Executive Officer, provided the Board with several updates, including the recent microgrid press release, upcoming GOV PV projects, the new office, rebranding efforts, and call center activities, and presented a new marketing video to the Board.

Mike Mielke, Senior Manager for Legislative Policy, gave an update on state and federal legislation and answered questions from the Board.

Public Comment: None

6. [Approval of Two Power Purchase Agreements for the Green Access Program with a Power Delivery Term of 20 Years Starting at a Commercial Operation Date on or About December 31, 2028, in an Amount Not-to-Exceed \\$35,000,000 \(Action\)](#) [YouTube](#)

Steve Campbell, Senior Analyst for Innovation Strategy, gave a presentation on the two power purchase agreements for the green access program and answered questions from the Board.

Public Comment: None

MOTION: Director McCune moved, seconded by Director Loraine to Approve Delegation of Signing Authority to the Chief Executive Officer to Execute Two Power Purchase Agreements (PPAs) Totaling 5 MW with King Kettle Clean Power I LLC, and Required Ancillary Documents with a Power Delivery Term of 20 years starting at a Commercial Operation Date on or about December 31, 2028, in an Amount Not to Exceed \$35,000,000.

MOTION PASSED: 15-0 (Absent: San Mateo County, Atherton, Burlingame, Colma, Daly City, Foster City, San Carlos, Woodside)

JURISDICTION	BOARD MEMBER	YES	NO	ABSTAIN	ABSENT
San Mateo County	Director Corzo				X
San Mateo County	Director Sharma	X			
Atherton	Director DeGolia				X
Belmont	Director McCune	X			
Brisbane	Director Mackin	X			
Burlingame	Director Colson				X
Colma	Director Gonzalez				X
Daly City	Director Daus-Magbual				X
East Palo Alto	Director Barragan	X			
Foster City	Director Jimenez				X
Half Moon Bay	Director Jonsson	X			
Hillsborough	Director Ragsdale	X			
Los Banos	Director Amabile	X			
Menlo Park	Director Nash	X			

Millbrae	Director Fung	X			
Pacifica	Director Boles	X			
Portola Valley	Director Taylor	X			
Redwood City	Director Martinez Saballos	X			
San Bruno	Director Medina	X			
San Carlos	Director Dugan				X
San Mateo	Director Loraine	X			
South San Francisco	Director Coleman	X			
Woodside	Director Aburish				X
	Total	15			8

7. [Approval of the 2026 California Public Utilities Commission Integrated Resource Plan Submission \(Action\)](#) [YouTube](#)

Sara Maatta, Senior Power Resources Manager, introduced Shayna Levia, Associate Manager of Power Resources, and Katarina Malmgren, Power Resources Analyst, who presented the Integrated Resources Plan submission and answered questions from the Board. Shawn Marshall, Chief Executive Officer, and Mehdi Shahriari, Senior Manager of Planning and Analytics, answered questions from the Board.

Public Comment: None

MOTION: Director Taylor moved, seconded by Director Fung to Approve the results of the Integrated Resource Plan analysis and the submission of results as presented by staff, or in a form substantially similar to that presented by staff, and direct the CEO, or designee, to prepare and submit the final narrative and data templates to the California Public Utilities Commission (CPUC) on or before August 10, 2026.

MOTION PASSED: 16-0 (Absent: San Mateo County, Atherton, Colma, Daly City, Foster City, San Carlos, Woodside)

JURISDICTION	BOARD MEMBER	YES	NO	ABSTAIN	ABSENT
San Mateo County	Director Corzo				X
San Mateo County	Director Sharma	X			
Atherton	Director DeGolia				X
Belmont	Director McCune	X			
Brisbane	Director Mackin	X			
Burlingame	Director Colson	X			
Colma	Director Gonzalez				X
Daly City	Director Daus-Magbual				X
East Palo Alto	Director Barragan	X			
Foster City	Director Jimenez				X
Half Moon Bay	Director Jonsson	X			
Hillsborough	Director Ragsdale	X			
Los Banos	Director Amabile	X			
Menlo Park	Director Nash	X			
Millbrae	Director Fung	X			

Pacifica	Director Boles	X			
Portola Valley	Director Taylor	X			
Redwood City	Director Martinez Saballos	X			
San Bruno	Director Medina	X			
San Carlos	Director Dugan				X
San Mateo	Director Loraine	X			
South San Francisco	Director Coleman	X			
Woodside	Director Aburish				X
	Total	16			7

8. [Approval of Recommendation to Award the 2026 Dave Pine Community Energy Award to Community Outreach Workers \(Promotoras\) \(Action\)](#) [YouTube](#)

Kirsten Andrews-Schwind, Associate Director of Community Relations and Climate Equity, gave a presentation on awarding the 2026 Dave Pine Community Energy Award to Community Outreach Workers (Promotoras).

Public Comment: None

MOTION: Director Loraine moved, seconded by Director Nash to Approve awarding the first annual Dave Pine Community Energy Award at the September 30, 2026 Impact Summit hosted by WestLight Energy.

MOTION PASSED: 16-0 (Absent: San Mateo County, Atherton, Colma, Daly City, Foster City, San Carlos, Woodside)

JURISDICTION	BOARD MEMBER	YES	NO	ABSTAIN	ABSENT
San Mateo County	Director Corzo				X
San Mateo County	Director Sharma	X			
Atherton	Director DeGolia				X
Belmont	Director McCune	X			
Brisbane	Director Mackin	X			
Burlingame	Director Colson	X			
Colma	Director Gonzalez				X
Daly City	Director Daus-Magbual				X
East Palo Alto	Director Barragan	X			
Foster City	Director Jimenez				X
Half Moon Bay	Director Jonsson	X			
Hillsborough	Director Ragsdale	X			
Los Banos	Director Amabile	X			
Menlo Park	Director Nash	X			
Millbrae	Director Fung	X			
Pacifica	Director Boles	X			
Portola Valley	Director Taylor	X			
Redwood City	Director Martinez Saballos	X			
San Bruno	Director Medina	X			

San Carlos	Director Dugan				X
San Mateo	Director Loraine	X			
South San Francisco	Director Coleman	X			
Woodside	Director Aburish				X
	Total	16			7

9. [Approval of an Agreement with Shawn E. Marshall, Chief Executive Officer, for the Term of July 1, 2026 to June 30, 2029 \(Action\)](#) [YouTube](#)

Jennifer Stalzer, General Counsel, gave an overview of the agreement with Shawn Mashall, Chief Executive Officer.

Public Comment: None

MOTION: Directors Fung and Taylor moved to approve the following recommendations of the Board's Ad Hoc Committee: (1) renew the Agreement with Shawn E. Marshall, Chief Executive Officer of WestLight Energy, for a term beginning July 1, 202 and concluding June 30, 2029 with the possibility of an extension; (2) increase Ms. Marshall's annual base salary from \$425,000 to \$440,300, representing a 3.5% increase; and (3) support the ad hoc committee's recommendation and decision to award Ms. Marshall a discretionary bonus of \$42,500 for the 2025–2026 service year.

MOTION PASSED: 16-0 (Absent: San Mateo County, Atherton, Colma, Daly City, Foster City, San Carlos, Woodside)

JURISDICTION	BOARD MEMBER	YES	NO	ABSTAIN	ABSENT
San Mateo County	Director Corzo				X
San Mateo County	Director Sharma	X			
Atherton	Director DeGolia				X
Belmont	Director McCune	X			
Brisbane	Director Mackin	X			
Burlingame	Director Colson	X			
Colma	Director Gonzalez				X
Daly City	Director Daus-Magbual				X
East Palo Alto	Director Barragan	X			
Foster City	Director Jimenez				X
Half Moon Bay	Director Jonsson	X			
Hillsborough	Director Ragsdale	X			
Los Banos	Director Amabile	X			
Menlo Park	Director Nash	X			
Millbrae	Director Fung	X			
Pacifica	Director Boles	X			
Portola Valley	Director Taylor	X			
Redwood City	Director Martinez Saballos	X			
San Bruno	Director Medina	X			
San Carlos	Director Dugan				X
San Mateo	Director Loraine	X			
South San Francisco	Director Coleman	X			

Woodside	Director Aburish				X
	Total	16			7

10. [Board Members' Reports \(Discussion\)](#) **YouTube**

Director Colson shared that Friday, July 17, Advisory Council for Historic Preservation, ACHP, proposed significant damaging revisions for Section 106 to the historic preservation act.

Director Boles shared about the Coastal Commission and the spaceport expansion.

ADJOURNMENT

Meeting was adjourned at 8:12 p.m.



**WestLight Energy
JPA Board Correspondence**

DATE: August 31, 2026

MEETING DATE: September 24, 2026

SPECIAL NOTICE/HEARING: None

VOTE REQUIRED: None

TO: Honorable WestLight Energy Board of Directors

FROM: Board of Directors

SUBJECT: Chair Report (Discussion)



**WestLight Energy
JPA Board Correspondence**

DATE: September 17, 2026
MEETING DATE: September 24, 2026
SPECIAL NOTICE/HEARING: None
VOTE REQUIRED: None

TO: Honorable WestLight Energy Board of Directors
FROM: Shawn Marshall, Chief Executive Officer
SUBJECT: CEO Report (Discussion)

BACKGROUND

During the Board meeting, CEO Shawn Marshall will provide an update on a variety of topics and activities of interest including progress and impact of WestLight name and rebrand, progress on the new office, 10 year anniversary and Q4 events upcoming for the Board's awareness.

WestLight Energy In the Community

Sept 30	Fall Summit, Farallon Room, Skyline College
July 31	Family Resource Day Tabling, Daly City
Oct 8	Community Feedback Forum on Affordability
Oct 8	Bay Area CCA Employer Webinar
Oct 10	Caltrain Clean Energy Trivia Train
Oct 10-11	San Carlos Art and Wine Festival
Oct 23	Community Feedback Forum on Health
Oct 24	Fifth Annual San Mateo County Climate Summit
Oct 25	Los Banos Chamber of Commerce 4th Annual Trunk or Treat

WestLight Energy Staffing Update

WestLight is accepting applications:
[Power Resources Specialist](#)



**WestLight Energy
JPA Board Correspondence**

DATE: September 15, 2026

MEETING DATE: September 24, 2026

SPECIAL NOTICE/HEARING: None

VOTE REQUIRED: None

TO: Honorable WestLight Energy Board of Directors

FROM: Mike Mielke, Senior Manager, Legislative Policy and Mark Fenstermaker, Principal and Co-Founder, Pacific Policy Group

SUBJECT: Recap of 2026 Legislative Session and Update on Recent Legislative Developments (Discussion)

BACKGROUND

As we do each year at this time, Mark Fenstermaker, Principal and Co-Founder of Pacific Policy Group, will provide the Board of Directors with an oral report on the end of the California legislative session, focused on our 2026 legislative activities and results. Mike Mielke, Senior Manager of Legislative Policy, will also provide a brief update of federal activities.

DISCUSSION

At the Board meeting, Directors will be provided an overview of the major political, legislative, and regulatory developments in Sacramento and Washington, D.C. most relevant to WestLight Energy.

In California, the Legislature has concluded the 2025–26 legislative session, bringing resolution to several of WestLight’s highest-priority bills. Attention now shifts to Governor Newsom’s action on legislation, the November election, implementation of newly enacted policies, and development of WestLight’s 2027 legislative agenda. At the Federal level, Congress has returned for a compressed September work period ahead of the midterm elections. Of particular importance to WestLight, a new Executive Order addressing security risks associated with foreign-produced bulk-power equipment could have implications for clean-energy procurement, project development, supply chains, and costs.

Sacramento End-of-Session Update

California lawmakers concluded a consequential legislative session dominated by bills addressing energy affordability, reliability, rapidly growing electricity demand, transmission infrastructure, and wildfire liability. Several of WestLight’s highest priority measures passed the Legislature, while others were significantly modified through negotiations or ultimately held

in the Appropriations committees.

The session also demonstrated WestLight's growing role in shaping energy policy. In addition to advancing sponsored legislation, WestLight worked with CalCCA, other CCAs, legislative offices, and stakeholders to materially improve several bills affecting customer costs, procurement obligations, electrification, and CCA authority.

Key Legislative Outcomes

Transmission Planning Reform – AB 2111 (Papan)

- AB 2111, jointly sponsored by WestLight Energy, Sonoma Clean Power, and the Abundance Network, passed the Legislature and represents one of WestLight's most significant legislative accomplishments of the session. The bill would make California's transmission planning more forward-looking and risk-aware, including extending the planning horizon from 15 to 20 years and considering multiple plausible resource and demand scenarios. The goal of the legislation is to identify needed transmission earlier, reduce interconnection delays, and avoid costly or reactive infrastructure decisions as electricity demand grows.
 - Position: Westlight Energy is a Co-Sponsor
 - Status / Location: Passed Legislature / Governor's Desk

PCIA Transparency – AB 1761 (Rogers)

AB 1761, sponsored by CalCCA, passed the Legislature and would require greater disclosure of the underlying data used to calculate certain nonbypassable charges, including the Power Charge Indifference Adjustment (PCIA), while protecting market-sensitive information. The PCIA remains a significant cost for CCA customers and an important affordability issue for WestLight. Greater access to the underlying data would give CCAs better tools to understand and verify these charges, improve accountability, and support longer-term efforts to address PCIA costs.

- Position: Support
- Status / Location: Passed Legislature / Governor's Desk

Resource Adequacy Flexibility – SB 1138 (Padilla)

SB 1138, CalCCA's other sponsored bill, would have allowed load-serving entities to use short-term transactions with one another to meet up to 25 percent of their Resource Adequacy obligations. The proposal was intended to provide greater flexibility within California's Slice-of-Day framework, helping CCAs manage compliance more efficiently and potentially reduce unnecessary procurement costs while maintaining reliability. Despite advancing through its policy committee, the bill was held in Assembly Appropriations and did not advance. The underlying challenges around Slice-of-Day implementation and RA procurement costs remain unresolved and may return in 2027.

- Position: Support
- Status / Location: Held in Assembly Appropriations; did not advance

Data Centers and Large Electrical Loads – SB 886 (Padilla) / AB 2383 (Zbur)

One of the session's most significant energy debates concerned how California should accommodate rapidly growing electricity demand from data centers and other large loads without shifting associated costs onto existing customers. Earlier versions of SB 886 and AB 2383 raised significant concerns regarding procurement requirements, customer cost shifts, and potential CPUC intrusion into CCA rate-setting and governance. Following extensive negotiations involving CalCCA and its members, the final package substantially strengthened

protections for existing customers, preserved access to CCA service, and expressly protected CCA rate-setting authority. The legislation nevertheless establishes new tariff, contracting, and procurement requirements for load-serving entities serving large new customers. A late drafting error in AB 2383 also created ambiguity regarding the timing of the required generation tariff. Because the error could not be corrected before the end of session, the author committed to submitting a Letter to the Assembly Journal clarifying legislative intent. WestLight will monitor implementation closely, including how the CPUC interprets the tariff requirements and the author's clarification.

- Position: Neutral

- Status / Location: Passed Legislature / Governor's Desk

Resource Adequacy and Procurement Planning – AB 2266 (Schultz)

AB 2266 was a significant focus of WestLight's advocacy and changed substantially over the course of the legislative process. Earlier versions sought greater alignment between Resource Adequacy and Integrated Resource Planning methodologies, raising concerns that an LSE could satisfy its own reliability requirements but nevertheless face additional procurement obligations or costs based on separate statewide reliability determinations. WestLight worked closely with CalCCA, other CCAs, the author's office, and stakeholders to address these concerns. The bill was substantially narrowed through late-session amendments, including changes to the treatment of capacity valuation, procurement planning, and compliance. The final bill therefore differed considerably from the proposal on which WestLight initially raised concerns.

- Position: Support if Amended

- Status / Location: Passed Legislature / Governor's Desk

EV Charging and Affordable Housing – AB 2748 (Quirk-Silva)

AB 2748 proposed temporary exemptions from certain EV-charging requirements for qualifying affordable housing developments. WestLight initially had significant concerns that the proposal was too broad and could undermine California's transportation electrification and EV-infrastructure objectives. WestLight worked behind the scenes with other concerned stakeholders and opponents to narrow the proposal. The bill was materially modified during the legislative process, including shortening the duration of the proposed exemption, allowing WestLight to move to a Neutral position. The bill was ultimately held in Senate Appropriations. The outcome illustrates WestLight's ability to help reshape legislation through targeted advocacy and coalition work even when it is not sponsoring a measure.

- Position: Neutral

- Status / Location: Held in Senate Appropriations; did not advance

Gas Infrastructure and Electrification – AB 2313 (Berman)

AB 2313 would allow certain customers facing gas service-line replacement to instead receive an incentive to electrify and discontinue gas service, potentially avoiding unnecessary long-term gas infrastructure investment. WestLight supported the bill's broader electrification objective while engaging on provisions that raised concerns regarding customer costs and implementation. The bill was amended during the legislative process and ultimately passed both houses.

- Position: Support

- Status / Location: Passed Legislature / Governor's Desk

Wildfire Liability

Lawmakers and the Governor spent the closing weeks of session negotiating changes to

California's wildfire liability framework. A compromise between the Governor, Senate and Assembly leadership was reached in the final days of the session, but the Assembly ultimately declined to take up the legislation, leaving the broader question of utility wildfire liability and financial stability unresolved. The issue is expected to return in 2027 given its implications for electricity affordability, utility finances, insurance, and infrastructure investment. In particular, Assembly Utilities and Energy Committee Chair Cottie Petrie-Norris has said she plans to have information hearings during the fall on the issue. WestLight will continue monitoring developments as policymakers consider a new approach.

Diablo Canyon

Efforts to extend Diablo Canyon beyond 2030 did not result in legislation this session. While the Nuclear Regulatory Commission has renewed the plant's federal operating licenses through 2044 and 2045, current state law authorizes operation only through 2030, meaning a further extension would require legislative action. The issue therefore shifts to the next Governor and the 2027 Legislature.

Looking Ahead: 2026 Elections

The November gubernatorial election between Xavier Becerra and Steve Hilton is increasingly shaping California's policy environment, including debate over energy affordability, reliability, permitting, infrastructure development, and implementation of the state's clean-energy transition.

Regardless of the outcome, the transition to a new Administration will create an important opportunity for WestLight to establish relationships with incoming officials and advance its priorities around affordable clean energy, reliability, transmission modernization, local energy choice, and effective implementation. WestLight is also developing its 2027 legislative priorities, informed by this year's work on transmission, PCIA reform, large loads, Resource Adequacy, and electrification.

Washington, D.C. Update

Congress has returned from its August recess for a compressed September work period ahead of the November midterm elections. The House approved a Senate-passed Continuing Resolution on September 1 to fund the federal government through December 11, while the Senate returns September 14. Congress is expected to spend much of October in recess ahead of the election.

For WestLight, the most consequential new federal energy development is the Administration's Executive Order addressing security risks associated with foreign-produced equipment used in the nation's bulk-power system.

Bulk-Power System Security Executive Order

On August 26, President Trump signed an Executive Order declaring a national emergency related to foreign threats to the U.S. bulk-power system. The order authorizes the Department of Energy (DOE) to restrict or impose conditions on certain foreign-produced electric equipment, components, software, and related technologies determined to pose national-security risks.

The scope could be significant for the electric sector, potentially covering transformers, grid-connected inverters, battery energy storage systems, generators, and control systems. DOE has 120 days from issuance to develop implementing rules and can establish pre-qualified

equipment and vendor lists and potentially impose conditions on previously acquired or installed equipment.

While the security objective is important, implementation could create challenges for CCAs and clean-energy developers if restrictions disrupt existing procurement commitments, constrain equipment availability, delay renewable energy or storage projects, create stranded costs, or increase customer electricity costs.

Community Choice Energy Alliance (CCEA; formerly LEAN Energy) is recommending that members assess potentially affected equipment and supply chains and engage with DOE as implementation develops. WestLight's priorities include:

- Workable treatment of existing contracts, projects, and equipment;
- Reasonable transition periods reflecting actual equipment availability;
- Clear safe harbors and pre-qualified vendor/equipment lists; and
- Avoiding unnecessary project delays, stranded costs, or customer cost increases.

WestLight should also work with project developers and suppliers to understand potential exposure within its existing and planned resource portfolio and coordinate with CCEA, CalCCA, and other industry organizations as DOE develops implementation requirements.

Federal Transmission and Permitting Reform

Transmission and permitting reform remain significant areas of bipartisan congressional interest. Senate committee leaders deferred further action on permitting legislation until September, while individual members of Congress have continued releasing proposals.

Although the compressed pre-election calendar limits the time available for major legislation, federal reforms that accelerate transmission development, improve interregional planning, and reduce unnecessary permitting delays could complement California's efforts—including AB 2111—to build infrastructure needed for reliability and growing electricity demand.

Other Federal Developments

- Large electrical loads and data centers continue to shape federal discussions around grid reliability, infrastructure investment, interconnection, and protecting existing customers from inappropriate cost shifts.
- Congress continues considering energy legislation, including permitting and nuclear-energy measures, while CCEA is monitoring the House "Ratepayer Protection Act" and other proposals affecting federal energy and environmental policy.
- EPA and DOE announced a phased transition of the ENERGY STAR program from EPA to DOE, currently scheduled for completion by July 2027.

Strategic Takeaways for WestLight

- The legislative session produced significant outcomes for WestLight, led by passage of our co-sponsored transmission planning legislation and CalCCA's PCIA transparency bill.
- WestLight's influence extended beyond sponsored legislation. Our work on AB 2111, AB 2266, AB 2748, the large-load package, and other measures helped materially reshape proposals affecting procurement, customer costs, electrification, and CCA authority.
- Affordability, reliability, and rapidly growing electricity demand are increasingly driving California energy policy and will remain important issues for the next gubernatorial administration and the 2027 Legislature.
- The federal bulk-power security Executive Order creates a potentially significant new supply-

chain and procurement issue. DOE implementation will determine the practical consequences for WestLight's existing and future clean-energy resources.

- With the legislative session concluded, WestLight's focus will increasingly shift toward gubernatorial action, implementation and regulatory engagement, the transition to a new state Administration and Legislature, and development of our 2027 legislative agenda.

ATTACHMENTS:

[AB 2111 Sponsor Request for Governor's Signature.pdf](#)
[September 2026 Bill Matrix - Final.pdf](#)

September 11, 2026

The Honorable Gavin Newsom
Governor, State of California
1021 O Street, Suite 9000
Sacramento, CA 95814

Re: Request for Signature on AB 2111 (Papan)

Dear Governor Newsom:

On behalf of Abundance Network, Sonoma Clean Power, and WestLight Energy, the sponsors of AB 2111, we respectfully request your signature on AB 2111.

Your Administration and the Legislature have taken significant steps to accelerate transmission development through permitting reform, improved interagency coordination, and new financing tools. AB 2111 complements and strengthens those efforts by modernizing the planning process that determines which transmission investments California will need.

Insufficient transmission capacity is already delaying clean-energy projects, limiting competition among resource developers, and increasing costs for electricity customers. In CAISO's most recent interconnection cycle, more than 10 gigawatts of projects that had advanced through portions of the process were withdrawn after encountering transmission availability constraints. When otherwise viable resources cannot connect to the grid, load-serving entities have fewer options and customers may be left paying more for electricity.

California's current planning process is built around resource portfolios that depend heavily on a specific set of assumptions about future electricity demand, technology costs, federal policy, and the availability and location of different energy resources. Those assumptions inevitably change. For example, a 2016 state planning forecast projected approximately 5 gigawatts of new capacity additions by 2030. By 2023, the projection had risen to approximately 60 gigawatts. Transmission projects can take more than a decade to plan, permit, and construct, making it essential that today's decisions remain useful under a range of plausible future conditions.

AB 2111 addresses this problem by requiring California's transmission-focused resource planning to account more systematically for uncertainty and risk. Specifically, the bill requires the California Public Utilities Commission, in consultation with the California Energy Commission, to use established decision-making-under-uncertainty methods, stress-test candidate planning decisions, and provide CAISO with at least three risk-prudent resource portfolios representing a range of plausible futures. It

also extends the planning horizon to at least 20 years and aligns the state's interagency planning framework with Federal Energy Regulatory Commission Order 1920.

The bill does not dictate approval of any particular transmission project or predetermined level of investment. Instead, it requires planners to examine the costs, reliability implications, risks, and adaptability of different near-term decisions before recommending a course of action. It also expressly requires implementation in a manner that keeps rates just and reasonable.

This approach will help California identify cost-effective investments that remain valuable even if particular forecasts do not materialize as expected. It will also help the state avoid both underbuilding – which can constrain reliability, clean-energy development, and competition – and making investments that are poorly suited to future needs.

AB 2111 was informed by research conducted with Princeton University's ZERO Lab, which has extensive experience in clean-energy modeling and decision-making under uncertainty, including influential analysis of the projected energy, emissions, and economic impacts of the Inflation Reduction Act. Their research demonstrates how planning across a range of plausible futures can reduce exposure to long-term cost and reliability risks while preserving flexibility as conditions change.

AB 2111 provides the planning foundation needed to make the Administration's broader transmission agenda more effective. By improving the information and analysis used to guide long-lived infrastructure decisions, the bill will help protect customers, strengthen reliability, and meet our clean-energy goals.

For these reasons, we respectfully request your signature on AB 2111. We would be pleased to provide any additional information or arrange a briefing with the Princeton researchers who informed this work. Your staff may also contact Kate Brandenburg at kate@brandenburglobby.com.

Thank you for your consideration.

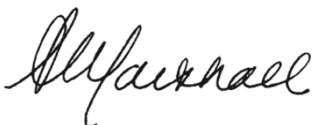
Sincerely,



Todd David
Political Director
Abundance Network



Geof Syphers
Chief Executive Officer
Sonoma Clean Power



Ms. Shawn Marshall
Chief Executive Officer
WestLight Energy

Status of 2026 Legislative Session Bills
As of September 11, 2026
With WestLight Energy and CalCCA Adopted Positions

Bill	Summary	Status	WestLight Energy Position	CalCCA Position	Comments
AB 1761 (Rogers) PCIA Data Transparency	This bill would require the PUC to ensure that all data relied on in determining the calculation methodology for the PCIA is made available to load-serving entities and ratepayer advocates on behalf of customers.	Passed Legislature. Awaiting Governor's signature or veto.	Support	Sponsor	This is CalCCA's sponsored legislation to increase data transparency on PCIA inputs.
AB 1787 (Schultz) Option Dynamic Rate Tariff	If the CPUC approves an IOU smart-meter upgrade, this bill would require the IOU to offer eligible customers an optional dynamic rate within 18 months, provide timely access to usage data, and protect against cost shifts. CCAs would retain authority over the generation-rate component for their customers.	Dead - Held on Senate Appropriations Suspense File			CalCCA had concerns with this bill but was able to work with the author on amendments that prevented an oppose position being needed.
AB 1813 (Ward) Community Renewable Energy Subscription Program	Requires the PUC to update the community solar program by creating a pathway for customers to subscribe to locally sited renewable energy and storage projects and receive bill benefits from those resources.	Passed Legislature. Awaiting Governor's signature or veto.	Support		
AB 1849 (Papan)	This bill would require the Air Resources Board to conduct an assessment of the amount of decarbonized gaseous fuels that will be needed	Dead - Held in Assembly Appropriations			

Status of 2026 Legislative Session Bills

As of September 11, 2026

With WestLight Energy and CalCCA Adopted Positions

Bill	Summary	Status	WestLight Energy Position	CalCCA Position	Comments
Decarbonized Gaseous Fuels	to decarbonize hard-to-electrify sectors and maintain reliability in the electricity sector.				
AB 2111 (Papan) Transmission Planning	This bill would require California's energy agencies and CAISO to use risk-prudent, longer-term transmission planning that accounts for multiple plausible futures and uncertainty. It would also strengthen coordination among the agencies, improve transparency into planning inputs and results, and help avoid costly transmission delays and investments that may not be needed.	Passed Legislature. Awaiting Governor's signature or veto.	Co-Sponsor	Support	WestLight Energy is co-sponsoring the bill along with Sonoma Clean Power and the Abundance Network
AB 2234 (Papan) CEQA: Geothermal Exploratory Projects	This bill would expressly include as part of a geothermal exploratory project equipment and activities necessary to establish interconnectivity between wells and reservoirs, for purposes of CEQA.	Passed Legislature. Awaiting Governor's signature or veto.			This bill is sponsored by Sonoma Clean Power. A similar version of this bill was vetoed by the Governor in 2025.
AB 2266 (Schultz) Resource Adequacy and Procurement Planning	Requires the CPUC to consider consolidating certain LSE procurement plans and, when feasible, consolidate reliability-compliance reporting, while providing LSEs at least 30 business days to comply with finalized reporting requirements.	Passed Legislature. Awaiting Governor's signature or veto.		Support if Amended	CalCCA, WestLight Energy and other CCAs negotiated with late amendments to address concerns
AB 2313 (Berman)	This bill would establish a CPUC-approved program offering incentives to eligible residential customers who electrify and	Passed Legislature. Awaiting	Support	Support	Co-sponsored by Earthjustice and NRDC. The program is intended

Status of 2026 Legislative Session Bills

As of September 11, 2026

With WestLight Energy and CalCCA Adopted Positions

Bill	Summary	Status	WestLight Energy Position	CalCCA Position	Comments
Home Energy Choice Act	discontinue gas service instead of having a planned gas service line replaced. The program would include enhanced incentives for disadvantaged communities and a "1% enrollment cap."	Governor's signature or veto.			to benefit gas customers by reducing capital spending on service-line replacements that can be avoided through customer electrification. The CPUC will determine important program details, including incentive levels and the mechanism for returning avoided capital-spending benefits to gas customers.
AB 2369 (Rogers) Energy-Only Resources	Requires the CPUC to increase opportunities for the deployment of energy-only resources.	Passed Legislature. Awaiting Governor's signature or veto.		Support	Sponsored by Sonoma Clean Power
AB 2383 (Zbur)	This bill would require IOUs to file transmission and distribution and generation-service tariffs for data centers, with requirements intended to	Passed Legislature. Awaiting		Neutral	CalCCA was in an Oppose Unless Amended position but

Status of 2026 Legislative Session Bills

As of September 11, 2026

With WestLight Energy and CalCCA Adopted Positions

Bill	Summary	Status	WestLight Energy Position	CalCCA Position	Comments
Large Energy Use Facilities	prevent infrastructure, procurement, and stranded costs from shifting to other customers. It would also require each CCA and electric service provider to adopt its own generation-service tariff for data centers by January 1, 2028.	Governor's signature or veto.			successfully negotiated amendments to move to neutral
AB 2493 (Petrie-Norris)	Requires the CPUC to establish a transmission development monitor to track transmission and interconnection project progress and delays, and to direct remedial actions to address material deficiencies within a large electrical corporation's or a transmission owner's reasonable control.	Passed Legislature. Awaiting Governor's signature or veto.			
AB 2508 (Hoover) Public Utilities Public Purpose Programs Fund	Existing law vests the Public Utilities Commission with regulatory authority over public utilities, including electrical corporations. Under existing law, the commission administers, or otherwise oversees, various public purpose programs, including energy efficiency and conservation programs, cost-effective energy efficiency programs, rate assistance programs for eligible food banks, and home insulation financial assistance programs. This bill would establish the Public Utilities Public Purpose Programs Fund. The bill would require the commission, no later than January 1 of each	Dead – Held in Assembly Appropriations	Oppose		Also opposed by MCE and San Diego Clean Power

Status of 2026 Legislative Session Bills

As of September 11, 2026

With WestLight Energy and CalCCA Adopted Positions

Bill	Summary	Status	WestLight Energy Position	CalCCA Position	Comments
	year, commencing January 1, 2027, to determine and publish the amount necessary to fund certain public purpose programs and programs administered by electrical regional energy networks for the following fiscal year, as provided.				
AB 2748 (Quirk-Silva) Affordable Housing Exemption from EV Charging Readiness Requirement	Would allow qualifying 100% affordable-housing developments submitting permit applications between January 1, 2025, and December 31, 2028, to comply with either the applicable EV-charging requirements in the 2025 California Green Building Standards Code or the applicable requirements in the 2024 supplement to the 2022 code.	Dead - Held on Senate Appropriations Suspense File	Neutral		WestLight Energy staff had discussions with the sponsors to address our concerns with the bill.
SB 222 (Wiener) Residential Heat Pump Systems: Water Heaters and HVAC: Permit Streamlining	This bill voids any policy in the governing documents of a HOA that would prevent replacing a gas appliance with an electrical appliance and specifically voids any covenants or other instruments that effectively prohibit the installation of residential heat pump systems. This bill also requires specified streamlining of local permitting for residential heat pump systems.	Passed Legislature. Awaiting Governor's signature or veto.			This bill is co-sponsored by SPUR, Bay Area Air District, and Building Decarb Coalition
SB 868 (Wiener) Portable Solar Generation Devices	Current law vests the Public Utilities Commission with regulatory authority over public utilities, including IOUs, while local	Passed Legislature. Awaiting			

Status of 2026 Legislative Session Bills

As of September 11, 2026

With WestLight Energy and CalCCA Adopted Positions

Bill	Summary	Status	WestLight Energy Position	CalCCA Position	Comments
	publicly owned electric utilities are under the direction of their governing boards. This bill would exempt a portable solar generation device, as defined, from all interconnection requirements imposed by state law, the commission, electrical corporation rules, or local publicly owned electric utility rules, as specified.	Governor's signature or veto.			
SB 886 (Padilla) Data Center Rates	This bill requires the CPUC to adopt new tariffs and update existing electric rules to ensure that utility costs for serving data centers are not shifted to other ratepayers. This bill requires the CPUC to adopt a transmission interconnection tariff for data centers seeking retail electric service at the transmission level and specifies requirements this tariff must include.	Passed Legislature. Awaiting Governor's signature or veto.		Neutral	CalCCA negotiated amendments and moved from Oppose Unless Amended to Neutral
SB 905 (Becker) Affordability	This bill would require the CPUC to consider reduced utility returns on equity for certain capital investments, examine lower-cost alternatives for financing utility infrastructure, and require large IOUs to publish information identifying opportunities for greater use of existing distribution-grid capacity.	Passed Legislature. Awaiting Governor's signature or veto.			
SB 913 (Becker)	Existing law requires the PUC, in consultation with the ISO, to establish resource adequacy (RA) requirements for all IOUs, ESPs, and CCAs. This bill would require the PUC, in coordination	Passed Legislature. Awaiting Governor's			

Status of 2026 Legislative Session Bills

As of September 11, 2026

With WestLight Energy and CalCCA Adopted Positions

Bill	Summary	Status	WestLight Energy Position	CalCCA Position	Comments
RA: Aggregated Distributed Capacity Resources	with the CEC and the ISO, on or before June 30, 2027, to enhance existing market-integrated pathways for aggregated distributed capacity resources, to qualify as resource adequacy capacity consistent with the PUC's requirements for aggregated distributed capacity resources.	signature or veto.			
SB 943 (Becker) Industrial Customers Transmission Charges	This bill would authorize changes to IOU rates to support electrification of industrial heat by capping volumetric surcharges for large commercial or industrial customers with new load on or after January 1, 2027, including through thermal energy storage systems	Dead - Held on Assembly Appropriations Suspense File			
SB 978 (Pérez) Data Centers Rates	This bill would require the CPUC to establish a special rate structure for data centers taking transmission-level electric service with an estimated peak demand of at least 75 megawatts. The rate structure must prevent cost shifts and require data centers to pay applicable upfront transmission or distribution infrastructure costs. Further, covered projects are subject to specified labor requirements.	Dead – Held in Senate Appropriations Committee			Data-center cost-allocation issues were subsequently addressed through the negotiated AB 2383 and SB 886 package
SB 1138 (Padilla) Resource Adequacy Transactability	This bill requires the PUC to authorize load-serving entities (LSEs) to meet not more than 25% of their resource adequacy (RA) requirements by trading energy capacity with other LSEs.	Dead - Held on Senate Appropriations Suspense File	Support	Sponsor	This is CalCCA's second sponsored bill of the session.

**Status of 2026 Legislative Session Bills
As of September 11, 2026**

With WestLight Energy and CalCCA Adopted Positions

Bill	Summary	Status	WestLight Energy Position	CalCCA Position	Comments
SB 1215 (Cortese) IOU EV Charging at Multifamily Properties	Existing law requires each IOU, not later than February 28, 2021, to file an advice letter for, and requires the PUC, not later than June 30, 2021, to approve, a new tariff or rule that authorizes each IOU to design and deploy all electrical distribution infrastructure on the utility side of the customer's meter for all customers installing separately metered infrastructure to support charging stations, other than those in single-family residences. This bill would require the PUC, on or before March 1, 2027, to direct IOUs to install Level 2 and Level 3 electric vehicle charging stations and associated equipment and facilities at multifamily housing to, by December 31, 2037 at least triple the amount of electric vehicle charging stations in existence, as of January 1, 2027, at multifamily housing in its service territory.	Dead – Held in Senate Appropriations Committee			
SB 1282 (Becker) Grid-Integrated Vehicle Technologies Standards	This bill would direct the CEC to adopt and implement standards for the grid-integrated vehicle technology and associated grid-integrated charging technology of new vehicles.	Dead – Held in Senate Appropriations Committee			



**WestLight Energy
JPA Board Correspondence**

DATE: September 8, 2026

MEETING DATE: September 24, 2026

SPECIAL NOTICE/HEARING: None

VOTE REQUIRED: None

TO: Honorable WestLight Energy Board of Directors

FROM: Steve Campbell, Senior Analyst

SUBJECT: Update on the Relaunch of the Portable Battery Program for Vulnerable Customers Impacted by Power Outages (Discussion)

BACKGROUND

In 2020, WestLight Energy launched a portable battery donation program to support medically vulnerable customers affected by Public Safety Power Shutoff (PSPS) events. These planned outages reduce wildfire risk by temporarily de-energizing electric infrastructure during hazardous (e.g. high wind) conditions. WestLight provided qualifying customers with a no-cost Goal Zero Yeti 3000X portable battery and, upon request, a portable solar panel through distribution partner Hasset Hardware. Senior Coastsiders, a community-based organization (CBO) from Half Moon Bay supported WestLight with customer outreach and enrollment. WestLight also coordinated with other local CBOs on outreach and referred customers to partner programs based on eligibility.

In total, the program distributed 146 portable batteries and 36 portable solar panels and referred 115 customers to nonprofit partners. Total program expenditures amounted to \$597,000. WestLight administered funding for equipment purchases and partner services, including outreach, marketing, eligibility verification, procurement, storage, distribution, and customer education. Participant feedback demonstrated the program's value: 91% of survey respondents reported using their portable battery during a power outage. Due to the success of the first round of the Portable Battery Program, WestLight is now relaunching a second round with slightly modified program rules as further described below.

DISCUSSION

Since 2020, Pacific Gas & Electric (PG&E) has taken steps to reduce the scope and customer impacts of PSPS events. As a result, there have been no PSPS events called in San Mateo County between 2021 and 2025. The lack of PSPS events is largely attributable to the implementation of PG&E's Enhanced Powerline Safety Settings (EPSS) program. EPSS are referred to as "fast-trip" settings that automatically interrupt power when a potential hazard, such as a tree branch contacting a line, is detected. EPSS operates independently of PSPS

and can cause outages without advance notice. Crews must inspect affected lines and address hazards before restoring service which may take hours.

Although these measures reduce wildfire risk, localized outages remain a concern for coastal and mountain communities. Reliable access to backup power is particularly important for medically vulnerable customers who depend on electricity to operate essential medical equipment. To respond to community needs, support the transition away from gas fired back-up generators, and understand the potential demand for a more robust program offering in the future, WestLight Energy is developing a limited second round of the Portable Battery Program to donate no-cost batteries to qualifying customers. This second round of the portable battery program has a \$250,000 budget that will support roughly 60-70 customers receiving portable batteries.

PROGRAM ELIGIBILITY

With limited funding this fiscal year, WestLight will target community members most in need of a no-cost portable battery. Eligible customers must meet all of the following criteria:

1. Receive electric service from WestLight, AND
2. Enrolled in CARE/FERA, AND
3. Enrolled in Medical Baseline, AND
4. Located on an EPSS circuit.

PROPOSED EQUIPMENT

WestLight is planning to offer two battery options, the Yeti 1500 and the Jackery 2000. These units have similar backup capacities and strong warranties. The Yeti 1500 is smaller but more difficult to move without integrated wheels. The Jackery 2000 is heavier but with integrated wheels, it is more easily movable between rooms.

Both units can power medical devices (e.g. CPAP machine) for multiple hours if fully charged. Charging more than one device at one time reduces the total number of hours available for backup power. For example, a Yeti 1500 can power a CPAP machine for up to 20 hours if that is the only appliance being charged. If customers charge a CPAP machine and a small LED light, a refrigerator, a cell phone, and an LED television, the Yeti 1500 provides up to 6 hours of backup power. If customers add a small portable heater, the backup power time plummets to 1.5 hours. The Jackery 2000 will provide up to 2 more hours of backup battery than the Yeti 1500.

PROGRAM DELIVERY

Battery Procurement and Distribution

WestLight is in the process of issuing a short Request for Qualifications (RFQ) to learn which vendor can provide the best price for battery procurement, delivery and customer education services. RFQ responses are due on October 5, 2026 and batteries are expected to begin deliveries in December 2026.

Marketing and Outreach

WestLight is planning on taking some marketing and outreach tasks in-house, such as the

development of a mailer, customer targeting, and as-needed program marketing. Using WestLight staff for customer account and marketing tasks will reduce the scope of work for Senior Coastsiders. Senior Coastsiders will provide limited marketing, telephone outreach, and enrollment support. WestLight may also leverage existing CBO partnerships as needed.

FISCAL IMPACT

A \$250,000 fund was included in the fiscal year 2026-2027 budget approved by this Board on June 25, 2026.

STRATEGIC PLAN

This program supports WestLight's strategic plan goals in the area of Equity Programs.



**WestLight Energy
JPA Board Correspondence**

DATE: September 14, 2026

MEETING DATE: September 24, 2026

SPECIAL NOTICE/HEARING: None

VOTE REQUIRED: None

TO: Honorable WestLight Energy Board of Directors

FROM: Blake Herrschaft, Senior Building Electrification Engineer

SUBJECT: Update on Bay Area Air District Rule 9-6, Zero Emissions of Nitrogen Oxide (NOx) Water Heating Requirements (Discussion)

BACKGROUND

The Bay Area Air Quality Management District is a regional public agency responsible for protecting air quality and public health across the San Francisco Bay Area. The agency, which has an appointed 24-member board of local elected officials, has state and federal authorities for monitoring and controlling sources of air pollution, especially stationary sources including commercial facilities and residential appliances. Rule 9-6 limits nitrogen oxides (NOx) emissions from natural gas-fired water heaters and small boilers sold, purchased, or installed in the nine-county Bay Area.

Nitrogen oxides are highly reactive, corrosive gases that pose significant risks to human health including asthma, lung and cardiovascular diseases, especially to children and the elderly. The 9-6 rule has been in place since 1993. The Air District Board amended the rule on March 15, 2023 to establish a zero-NOx standard for newly manufactured water heating equipment. The rule applies to sale and installation of water heaters only. It does not require an operating water heater to be removed, is not triggered by the sale of a property, and does not apply to stoves, ovens, or clothes dryers. It generally affects the replacement equipment available when an existing water heater reaches the end of its useful life.

Under the rule currently in effect, water heaters rated at 75,000 BTU per hour or less must meet the zero-NOx standard if manufactured on or after January 1, 2027. Based on products currently available in the United States, this would generally mean installing an electric water heater, most often a heat pump water heater. The current rule contains no project-specific affordability, space, or electrical exemptions.

Following a two-year implementation development process, the Air District released draft flexibility amendments in July 2026. The Air District Board is expected to consider the amendments on November 4, 2026. Until the Air District takes final action, the July proposal remains a draft and the January 1, 2027 compliance date remains in effect.

DISCUSSION

WestLight does not have a policy position on the Air District rule but has tracked the rule making process through the Air District's working group and related forums providing technical

information, especially detail on costs and challenges. In addition, WestLight's programs have been structured to address challenges and ensure that undue burdens which could arise if the rules are adopted are significantly reduced. The discussion below details the proposed Air District rule amendments as currently understood (subject to change by the Air District, final materials are pending circulation to the Air District Board) and related WestLight program positioning and activity.

The proposed amendments would preserve the zero-NOx standard while changing the timing and creating pathways for customers whose properties or finances make a compliant installation unusually difficult. The principal proposed rule changes are summarized below:

Summary of changes versus current rule as adopted

	Current rule as adopted	Proposed Amendments
Small, tank-type, water heaters Zero NOx requirement start date	1/1/2027	1/1/2028
Large or instantaneous water heaters Zero NOx requirement start date	1/1/2031	1/1/2033
Allowance for very small water heaters	N/A	Small water heaters 30 gallons or less are exempt from rules
Exceptions	None	Exceptions for low income, difficult installations, emergency replacements, and multi-family

Summary of exceptions:

Exception Type	Description	Limitation Timeline
30-gallon water heaters or smaller	Expressly allowed. This was added for homes with space constraint or ventilation issues with current water heater locations.	None
Multi-family 5 or more units	Expressly allowed to use gas water heaters.	Ends in 2033
Income qualified	Low-income or housing-cost burdened households	None
Space constraints	Small spaces that have ventilation issues or low ceilings with height issues that would increase installation costs	One-time per address
Emergency replacements	Each temporary gas unit must be removed within 12 months	None

High hot water demand businesses	Restaurants and food service, laundromats and dry cleaners, healthcare, assisted-living	None
Hydronic systems	Homes or buildings with complex hydronic systems that are expensive to electrify	Ends in 2031
Qualifying electrical constraints		
Low electrical panel capacity	The serving electrical panel is below 100 amps—or below 60 amps for a multifamily building with five or more units.	One-time exception per address
Knob-and-tube wiring	The building has knob-and-tube wiring, and installation would require more than 50 feet of conduit between the water heater and the electrical panel or subpanel.	One-time exception per address
Long circuit run	The water heater would require a new 240-volt connection involving more than 50 feet of wiring or conduit.	One-time exception per address
Lack of spare breaker space	The serving panel has neither an open circuit-breaker position nor an expansion slot.	One-time exception per address

The amendments would also establish an online exemption-certificate process and new seller, contractor, and distributor notice and recordkeeping requirements. Air District staff estimate that up to 38 percent of annual small residential water heater installations could qualify for an income-based or project-constraint exemption. The estimate does not include continued sales of tanks of 30 gallons or less.

CUSTOMER COST AND IMPLEMENTATION

Air District staff estimate that a standard heat pump water heater installation costs approximately \$3,500 more than a comparable gas replacement before incentives. The estimate includes an equipment price difference of approximately \$600 to \$1,600 plus added labor for electrical work, condensate drainage, ventilation, plumbing, and gas-line capping. Actual project costs vary substantially; the proposed exemptions are intended to remove the highest-cost cases from the general requirement.

The Air District's draft is designed around replacement at end of life. That makes preparation important: customers who plan before a failure have more time to evaluate equipment, confirm electrical and space conditions, obtain permits, combine incentives, and avoid an emergency decision. WestLight's programs have been designed to provide that preparation and customer support regardless of the outcome of the Air District vote.

WESTLIGHT CUSTOMER READINESS PROGRAMS

WestLight has launched and expanded voluntary services that address the practical barriers identified through the Air District's implementation process. These programs are available because they help customers lower energy use, improve home comfort and safety, and manage the cost and complexity of appliance replacement.

WestLight's program design strategy in advance of and notwithstanding the hot water rules is:

- **Cost equivalence for all non-exempt households:** our rebates are designed to create cost equivalence for all households, regardless of income level
- **No-to-low cost for those in need:** we currently offer free installations for all low-income homeowners
- **One-stop shop:** we have designed a full suite of programs to make the transition from methane gas to heat pump water heater easy for all customers.

Summary of current program offerings

- **Home Upgrade rebates.** WestLight currently offers up to \$4,000 for qualifying gas-to-heat-pump water heater replacements completed during the limited-time September 1 through October 31, 2026 offer, plus additional support for eligible CARE or FERA customers and qualifying electrical panel work.
- **Zero Percent Loans.** Customers may finance eligible home upgrades with a 0 percent interest loan of up to \$10,000 without a credit check, reducing the need to pay the full project cost upfront.
- **Free installations for low-income customers.** WestLight has helped electrify hundreds of low-income homes at no cost to the customer, and the lessons learned from this program are driving down costs of HPHW replacements for customers throughout California.
- **Personalized and full-service installation support.** Customers can receive a free consultation, compare options, or use a vetted contractor with negotiated pricing, permit coordination, rebate processing, and WestLight-backed workmanship support.
- **Emergency Water Heater Replacement.** WestLight provides 24/7 intake and prioritizes restoration of hot water within 48 hours. Where enabling work is needed, the service can use a temporary gas unit while the permanent heat pump installation is coordinated. Qualified income-eligible owner-occupants may receive a no-cost installation.
- **Lower-power and space-constrained solutions.** WestLight rebates apply to qualifying heat pump water heaters regardless of voltage or configuration, allowing 120-volt and split-system options where appropriate. Smart circuit controllers can also help some homes add equipment without increasing electrical service capacity.
- **Permitting and contractor readiness.** WestLight is working with local permitting agencies and contractors to improve installation consistency, reduce delays, and expand familiarity with heat pump water heater products and electrical-load management strategies.

STAFF APPROACH THROUGH THE AIR DISTRICT VOTE

WestLight has taken no position regarding the Air District rules. WestLight has provided technical information to the Air District on request and through participation in Air District facilitated forums. Through the Home Upgrade program offerings WestLight continues to focus

on helping customers understand their choices and complete affordable, reliable projects.

Before and after the November 4 vote, staff plans to:

- Monitor the final Air District staff proposal and Board action, including any changes from the July draft.
- Update customer-facing guidance so it accurately explains the effective date, covered equipment, exemptions, and where customers can obtain an Air District exemption certificate.
- Coordinate with contractors, local governments, and regional incentive partners so customers receive consistent information and can identify available funding.
- Track customer demand, project costs, emergency-response performance, and the availability of lower-power products; return to the Board if material program or budget changes are needed.

This approach positions WestLight as a practical implementation partner for its customers. In summary, we are ready if the new rules are adopted. If they aren't, we will still provide customer support to any customer looking to make the switch to a heat pump water heater as is consistent with our mission and strategic plan objectives.

FISCAL IMPACT

There is no new fiscal impact associated with this informational item. The customer assistance described above is being delivered through existing Board-approved programs and budgets. Staff would return to the Board for any future action that exceeds existing authority or available funding.



**WestLight Energy
JPA Board Correspondence**

DATE: September 14, 2026

MEETING DATE: September 24, 2026

SPECIAL NOTICE/HEARING: None

VOTE REQUIRED: None

TO: Honorable WestLight Energy Board of Directors

FROM: Jana Kopyciok-Lande, Director of Innovation Strategy; Ross Fisher, Program Manager, Distributed Energy Resources

SUBJECT: Briefing on the Pescadero Community Microgrid (Discussion)

RECOMMENDATION

No action recommended, discussion only.

BACKGROUND

WestLight Energy's (WestLight) mission is to provide affordable, clean electricity and advance local solutions that lower costs, reduce pollution, and strengthen community resilience. In 2018, WestLight initiated customer and community programs, which have been developed within three major pillars: Building decarbonization, transportation decarbonization and distributed energy resources (DERs). In 2024, WestLight created an Innovation Strategy (IS) department with one of its goals focused on diversifying Agency revenues by identifying public funding opportunities to expand customer programs. Another core goal of the IS department is to explore new business models for utility-connected DERs such as community solar and microgrids. Guided by the results of the Board-led surplus funds effort in 2023 and Goal 4 of WestLight's DER Framework 2025 – 2030, which was approved by the Board in April 2025, staff has been pursuing public funding opportunities to support the development of multi-customer, community-based microgrids ("Community Microgrids") in its service area. Community Microgrids are an example of how WestLight demonstrates advanced energy leadership by piloting an innovative project that supports local resilience and rural economic development while serving as a replicable model for others in the State.

Community Microgrids are energy systems that power multiple customers and critical facilities within a defined boundary through a clean solar and battery energy storage system that is directly connected to the utility's distribution grid (also called a front-of-the-meter (FTM) system). The microgrid operates in parallel with the grid during normal conditions but can disconnect from the larger grid and operate in "Island Mode" during times when the larger grid experiences an outage. The Community Microgrid keeps the lights on for all customers and critical facilities within the defined boundary during grid outages, thereby greatly increasing the

resilience of a community.

Community Microgrids are technically complex and costly to develop. Under current regulatory structures in California, they can only be developed in collaboration with the distribution utility (i.e., Pacific Gas & Electric (PG&E)) under a grant program called the Microgrid Incentive Program (MIP). After Board approval in November 2025, WestLight applied to the MIP with two proposed Community Microgrids in December of 2025 – the Pescadero Community Microgrid and the Half Moon Bay Community Microgrid. Following a funding pledge from the County of San Mateo and a highly competitive grant process, the Pescadero Community Microgrid (Pescadero CMG) was awarded a MIP grant in July 2026, which will allow WestLight to continue pursuing the project. The following provides a high-level summary of project details and benefits, as well as a description of upcoming activities and decision points.

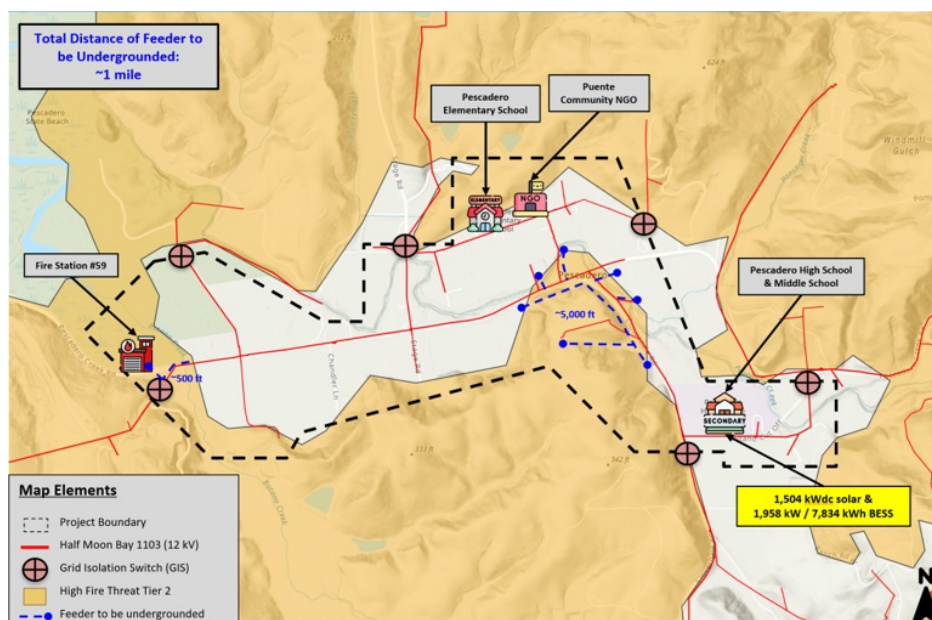
DISCUSSION

Microgrid Boundary

The Pescadero CMG covers nearly the entire town of Pescadero. This is particularly innovative because most Community Microgrids are focused on a small number of “critical facilities”, i.e., facilities that provide an essential service to the community. The Pescadero Community Microgrid will cover more than 5 critical facilities (three schools, the fire station, Puente Resource Center and Community Health Services, and various community centers), as well as over 100 residences and businesses.

The microgrid boundaries are established through so called “isolation devices” which isolate the microgrid from the larger grid when the larger grid experiences an outage. Factors for determining the exact boundary line included the location of critical facilities, grid topology, the existence of high fire threat districts (HFTD) and related utility line under-grounding requirements, as well as cost factors.

Figure 1: Pescadero Community Microgrid Boundary



Project Details

The Pescadero CMG is based on a 1.5 MW solar system and 8 MWh battery system that will provide electricity to customers located within the microgrid boundary while the microgrid is islanded. Except for a short interruption when the microgrid switches into islanded mode, customers will not realize that an outage is occurring. There will also be no changes to their utility rate or electric bill overall – they will continue to pay for their electric service as if the microgrid didn't exist.

WestLight is engaging with the Pescadero La Honda Unified School District to discuss the potential of locating the project at the Pescadero Middle and High School. Various project designs and locations are being considered, and more details will be available in 2027.

Benefits

The distribution grid feeder serving Pescadero experienced 442 outages in calendar years 2021 and 2022 with an average outage duration of 8 hours. 28 outages lasted longer than 24 hours extending to multiple days. The core benefit of the Pescadero CMG is that customers within the microgrid boundary will remain energized when the "macro grid" around them experiences an outage. In the initial years of operation, the Pescadero Community Microgrid can provide over 7 days of back-up power during the summer months and up to 3 days of back-up power during the winter months under average load assumptions. Even under conservative forecasting assumptions (i.e., assuming 90th percentile load during the worst winter conditions and considering both load growth and system degradation), the microgrid will still provide at least 24 hours of back-up power in year 10 of operations.

Next Steps and Decision Points

WestLight was awarded MIP funding for the Pescadero CMG in the summer of 2026. With that, WestLight is now engaging with PG&E and other stakeholders to continue developing plans for the microgrid. As a first step, WestLight has published a request for proposal (RFP) for Engineering Services to identify a technical partner for the microgrid development. Next, WestLight will sign a Grant Agreement with PG&E by mid-November which will outline the terms of engagement under the MIP, as well as the estimated project schedule and budget. Following the signing of the grant agreement, PG&E will lead two studies – the Interconnection and Microgrid Islanding Studies. These studies will take 12-18 months and will identify the required upgrades to the distribution grid to enable both the interconnection of the solar and battery system, as well as the safe islanding of the microgrid. In addition, the microgrid will also undergo environmental and land use studies, as well as permit reviews.

Once all the studies are completed, WestLight will have a complete understanding of the requirements and costs to get the microgrid built and online. At that time, likely around Q4 2028, staff will bring the full details of the project design and costs, including the question of project ownership, to WestLight's Board for final review and approval. Project development activities will begin only if the Board approves projected costs and expenditures. This will include an RFP to select a project developer who will then lead equipment procurement and project construction. The microgrid is expected to be operational by mid-2031.

FISCAL IMPACT

The Pescadero CMG is co-funded by the following partners and programs:

1. **PG&E's MIP**: \$3.5 million for project development, up to \$3 million for grid upgrades and up to \$1 million for interconnection for a total of up to \$7.5 million;
2. **San Mateo County**: \$3 million;
3. **WestLight Energy**: up to \$10 million

For WestLight's portion, the microgrid is accessing funding that had already been set aside for "Local Power Projects" in the WestLight Surplus Funds effort dating back to 2023. On November 20, 2025, the WestLight Board of Directors approved the use \$10 million of those funds for the Pescadero CMG as was contemplated in the surplus funds use plan. This investment will not only spur economic development and provide energy resilience for a vulnerable community "at the end of the line," it will provide an opportunity for WestLight to demonstrate leadership in advancing innovative clean energy solutions in California that others can replicate in the future. Furthermore, WestLight plans to pursue other funding opportunities for the Pescadero Community Microgrid to offset WestLight's costs.

It is expected that only a small portion of the costs to WestLight and San Mateo County will incur before the final Board approval in late 2028. The large majority, if not all, of the costs for the Interconnection and Microgrid Islanding Studies in 2027 will be covered by the MIP funds provided by PG&E. The only costs that WestLight and the County will incur until the end of 2028 are staff costs, engineering costs, as well as costs associated with environmental and land use studies and permit reviews. If WestLight decides in late 2028 that it is unable to pursue the microgrid due to project costs or complexities uncovered during the studies, WestLight does not have to reimburse any costs already incurred under the MIP.

STRATEGIC PLAN

The proposed Community Microgrid supports the following elements of WestLight's DER Framework 2025 - 2030:

- Goal 4 – Explore business models to foster the development of front-of-the-meter Distribution Resources in WestLight's service area.

It also supports various Guiding Principles and Strategic Policies of the WestLight 2026 – 2030 Strategic Plan:

- Guiding Principles:
 - Economic Development – supporting economic development in a vulnerable community
 - Driving Innovation – creating a replicable model for other CCAs
- Strategic Policies:
 - Equity Programs – identify external funding for vulnerable communities
 - Distributed Energy Resources – deploy new local solar capacity



**WestLight Energy
JPA Board Correspondence**

DATE: August 31, 2026

MEETING DATE: September 24, 2026

SPECIAL NOTICE/HEARING: None

VOTE REQUIRED: None

TO: Honorable WestLight Energy Board of Directors

FROM: Board of Directors

SUBJECT: Board Member Reports (Discussion)



**WestLight Energy
JPA Board Correspondence**

DATE: September 14, 2026

MEETING DATE: September 24, 2026

SPECIAL NOTICE/HEARING: None

VOTE REQUIRED: None

TO: Honorable WestLight Energy Board of Directors

FROM: Kim Le, Director of Data and Technology

SUBJECT: Data and Technology Department Quarterly Update

BACKGROUND

Data and Technology at WestLight is comprised of two teams, each playing a crucial role in the organization's operations. The Data team is responsible for managing large volumes of data from various sources, including customer energy usage and energy market data, and ensuring its accuracy and accessibility for analysis, reporting, and decision-making. The IT team oversees the management of WestLight's software and hardware systems and ensures the reliable and secure operation of the organization's technology infrastructure and platforms.

DISCUSSION

OVERVIEW

During the third quarter of 2026, the Data & Technology Department focused on improving the reliability and usability of core data systems, strengthening monitoring and data quality processes, expanding internal reporting tools, enhancing access management, and preparing the technology infrastructure for the new office.

THE DATA TEAM HIGHLIGHTS

Data Reliability and Monitoring

The Data team expanded monitoring across key data pipelines to better identify failed jobs, missing data, and potential data quality issues. The team also continued developing dashboards and alerts to improve visibility into the health and completeness of critical CAISO datasets.

Data Quality and Validation

The team reviewed and corrected a range of data inconsistencies, including missing records, duplicate data, and discrepancies between related datasets. Data warehouse reporting was also expanded to better compare datasets over time and identify gaps that may require follow-up.

Internal Data Tools and Reporting

The team continued improving tools that help staff access and analyze customer energy usage and other operational information. Enhancements included updates to the Load Usage Lookup Tool, Max Demand Analysis Tool, and solar monitoring dashboards to improve usability and support a broader range of business needs across departments.

Billing and Data Automation

Work continued on automating the collection and processing of billing records and other externally provided data. This included processing historical billing documents and improving automated workflows so that data can be received, validated, and made available for analysis with reduced manual effort.

THE IT TEAM HIGHLIGHTS

Identity and Access Management

Following the organization's transition to its new technology environment, the IT team continued refining single sign-on, integrating additional business applications, and improving account provisioning and access management. These efforts are intended to provide staff with a more consistent user experience while strengthening security controls.

Account and Access Auditing

The IT team began a rolling audit of user accounts, shared accounts, and groups across organizational platforms to ensure access remains current and appropriate. This ongoing review supports security compliance, strengthens access controls, and helps reduce risks associated with outdated or unnecessary accounts and permissions.

New Office Technology Infrastructure

A significant portion of the quarter was devoted to preparing the technology infrastructure for the new office. The team managed internet installation, complex network design, wireless coverage, conference room technology, equipment procurement, backup connectivity, and power protection to support reliable operations in the new space. This work represents a significant effort by the IT team and is critical to ensuring technology systems are fully operational and ready for staff occupancy.

Technology Operations and Security

Alongside these major initiatives, the IT team continued to provide day-to-day technology support, device management, account administration, cybersecurity monitoring, and equipment planning. The team also reviewed technology assets and security needs in preparation for the office move and future operational requirements.



WestLight Energy
JPA Board Correspondence

DATE: September 11, 2026

MEETING DATE: September 24, 2026

SPECIAL NOTICE/HEARING: None

VOTE REQUIRED: None

TO: Honorable Peninsula Clean Energy Authority Board of Directors

FROM: Kelly Lew-Quintal, Risk Manager

SUBJECT: Energy Supply Procurement Quarterly Update

BACKGROUND

In November 2024, the Board of Directors (Board) approved Policy Number 23 (Energy Risk Policy) which requires that a summary of all short-term energy procurement contracts (terms of less than five (5) years) be reported to the Board quarterly.

DISCUSSION

This memo summarizes all short-term energy procurement contracts executed by the Chief Executive Officer or the Senior Director of Power Resources since the Board meeting in May 2026.

Transaction Effective Month	Purpose	Counterparty	Term
April	Sale of Resource Adequacy	NRG Business Marketing	1 month
May	Buy of GHG-Free Energy	Morgan Stanley Capital Group Inc.	8 months
May	Buy of Resource Adequacy	City of Riverside	2 months
May	Buy of Resource Adequacy	Clean Power Alliance	1 month
May	Sale of Resource Adequacy	BP Energy Company	1 month
May	Sale of Resource Adequacy	City of Riverside	2 months
June	Buy of Hedge Energy	ConocoPhillips Company	1 month
June	Buy of Hedge Energy	ConocoPhillips Company	1 month
June	Buy of Hedge Energy	ConocoPhillips Company	1 month

June	Buy of Hedge Energy	ConocoPhillips Company	1 month
June	Buy of Hedge Energy	J. Aron and Company LLC	1 month
June	Buy of Hedge Energy	Morgan Stanley Capital Group Inc.	1 month
June	Buy of Hedge Energy	Morgan Stanley Capital Group Inc.	2 months
June	Buy of Hedge Energy	Morgan Stanley Capital Group Inc.	2 months
June	Buy of Hedge Energy	Morgan Stanley Capital Group Inc.	2 months
June	Buy of Hedge Energy	Morgan Stanley Capital Group Inc.	2 months
June	Buy of Resource Adequacy	Chevron Power Holdings Inc.	1 month
June	Buy of Resource Adequacy	Karbone Energy LLC	1 month
June	Buy of Resource Adequacy	Silicon Valley Clean Energy Authority	1 month
June	Sale of Resource Adequacy	Ava Community Energy Authority	1 month
July	Buy of Hedge Energy	J. Aron and Company LLC	11 months
July	Buy of PCC1	Sonoma Clean Power Authority	12 months
July	Buy of Resource Adequacy	Ava Community Energy Authority	1 month
July	Buy of Resource Adequacy	Sonoma Clean Power Authority	1 month
July	Sale of Import Allocation Rights	City of Riverside	12 months
July	Sale of PCC1	Sonoma Clean Power Authority	12 months
July	Sale of Resource Adequacy	Ava Community Energy Authority	1 month
August	Buy of GHG-Free Energy	Morgan Stanley Capital Group Inc.	5 months
August	Buy of GHG-Free Energy	Sonoma Clean Power Authority	5 months
August	Sale of Import Allocation Rights	City of Riverside	3 months
August	Sale of Resource Adequacy	City of Banning	3 months
August	Sale of Resource Adequacy	Clean Energy Alliance	1 month
August	Sale of Resource Adequacy	Silicon Valley Clean Energy Authority	1 month
August	Sale of Resource Adequacy	TGP Energy Management, LLC	1 month

STRATEGIC PLAN

The above contracts were executed after the May 2026 Board meeting for transaction effective months of April, May, June, July, and August 2026 to support the Power Resources Objective 2 for Procurement: Procure power resources to meet regulatory mandates and internal priorities at affordable cost.



**WestLight Energy
JPA Board Correspondence**

DATE: September 15, 2026
MEETING DATE: September 24, 2026
SPECIAL NOTICE/HEARING: None
VOTE REQUIRED: None

TO: Honorable WestLight Energy Board of Directors
FROM: Jeremy Waen, Senior Director of Regulatory Policy
SUBJECT: Regulatory Policy Team Quarterly Update

BACKGROUND

This report provides updates on key regulatory proceedings and policy developments affecting WestLight Energy, including ongoing reform of the Power Charge Indifference Adjustment (PCIA), statewide resource planning and procurement, transportation electrification policy, and California Independent System Operator (CAISO) market and reliability reforms. Several of these matters may influence future customer costs, procurement strategy, and operational flexibility. No Board action is requested.

DISCUSSION

California Public Utilities Commission (CPUC)

Power Charge Indifference Adjustment (PCIA) Reform

The CPUC continues considering longer-term reforms to the Power Charge Indifference Adjustment (PCIA), an exit fee charged to Community Choice Aggregation (CCA) customers. WestLight customers' 2026 PCIA rates are already in effect; additional changes adopted through the ongoing rulemaking are expected to affect 2027 or later PCIA rates.

In Track 2, the CPUC is considering how to value pre-2019 banked Renewable Energy Credits (RECs) used by investor-owned utilities for compliance with California's Renewable Portfolio Standard. An August Proposed Decision would assign these RECs a value of zero for purposes of the PCIA. CalCCA opposes that treatment, arguing that CCA customers who contributed to the cost of the RECs should receive credit for the compliance benefits they provide to bundled utility customers. CalCCA presented its legal arguments at oral argument on August 31. The CPUC subsequently issued a revised Proposed Decision that retains the proposed zero valuation, and the matter is scheduled for consideration at the Commission's September 17 voting meeting. CalCCA is evaluating potential next steps.

Track 3 is considering broader reforms to the PCIA framework, including treatment of utility-owned assets, allocation of portfolio costs and benefits, and CCA access to data used in PCIA

calculations. On August 27, WestLight staff held an ex parte meeting with senior advisors to Commissioner Matthew Baker and CPUC President Alice Reynolds to discuss WestLight's interests and priorities for Track 3. WestLight also continues working through CalCCA as these longer-term reform proposals develop.

Integrated Resource Planning (IRP)

The CPUC is considering two significant developments in its Integrated Resource Planning (IRP) proceeding, which guides statewide electricity resource planning and can establish procurement requirements for load-serving entities such as WestLight.

First, on June 23, the CPUC requested comments on a third proposed structure for the Renewable and Clean Power Procurement Program (RCPPP), a long-term framework intended to replace periodic statewide procurement mandates. The new option includes technology-specific procurement requirements and a proposed allocation of procurement responsibility that could shift additional costs to load-serving entities with relatively high levels of existing long-term contracted resources, such as WestLight. WestLight is evaluating the proposal and engaging in the proceeding to preserve flexibility and equitable treatment of early procurement.

Second, on August 31, the CPUC proposed a resource portfolio for use by CAISO in planning future transmission needs. The proposal recognizes practical limits on the amount of new solar and storage that can be developed from the existing interconnection queue and considers a more diverse mix of resources, including wind and geothermal, during the 2030s. The approach could relax certain interim greenhouse gas planning targets in the early 2030s, but would not change California's 2045 targets or renewable and greenhouse gas requirements for the mid-2030s. For WestLight, a more realistic and diverse planning portfolio could reduce the risk of overbuilding particular technologies and associated market impacts while supporting long-term reliability and clean energy goals.

Transportation Electrification

On July 29, WestLight celebrated completion of the Peninsula Pines electric vehicle (EV) charging project, the largest multifamily retrofit of its kind in California and the second largest in the country. The project installed 209 dedicated charging ports - one for each assigned parking space - without increasing the electrical capacity of the property's utility service. Congressman Mullin, Chair Medina, Vice Chair Ragsdale, and Director Coleman provided remarks at the event.

The project also provided an opportunity to demonstrate WestLight's right-sizing approach to state regulators. CPUC Commissioner Matthew Baker and California Energy Commission Commissioner Nancy Skinner delivered keynote remarks, with staff from both agencies also attending. The project illustrates how multifamily charging can expand access to EV infrastructure while making efficient use of the existing grid and avoiding unnecessary utility infrastructure costs. WestLight staff continue engaging with state agencies to advance policies that support affordable, right-sized electrification approaches across California.

California Independent System Operator (CAISO)

Resource Adequacy and Maximum Import Capability Reform

CAISO continues evaluating reforms to its Resource Adequacy (RA) program and the rules governing imports of out-of-state capacity. WestLight remains actively involved in a coalition of

18 stakeholders, including Community Choice Aggregators, publicly owned utilities, and generators, seeking reforms to the Maximum Import Capability (MIC) framework. These reforms are intended to improve access to out-of-state resources that can help meet California reliability requirements and increase procurement flexibility.

CAISO is also finalizing implementation details for the Unforced Capacity (UCAP) methodology adopted by the CPUC and considering reforms to the Resource Adequacy Availability Incentive Mechanism (RAAIM), which addresses resource availability. These changes may affect how capacity resources are valued, how outages are treated, and the cost and flexibility of future RA procurement. WestLight continues participating in the stakeholder process and helping develop proposals in these areas.

FISCAL IMPACT

This report is informational only and has no direct fiscal impact. Several proceedings described above may affect future customer rates, procurement costs, or program implementation depending on final regulatory outcomes.



**WestLight Energy
JPA Board Correspondence**

DATE: September 18, 2026

MEETING DATE: September 24, 2026

SPECIAL NOTICE/HEARING: None

VOTE REQUIRED: None

TO: Honorable Peninsula Clean Energy Authority Board of Directors

FROM: Nelly Wogberg, Board Clerk

SUBJECT: Report on California Community Power (CCP) Joint Powers Authority

ATTACHMENTS:

[2026 09 16_CA Community Power Board Report.pdf](#)

California Community Power

901 H St, Ste 120 PMB 157, Sacramento, CA 95814 | cacomunitypower.org

TO: Board of Directors and Alternates **DATE:** 9/17/26
FROM: Alex Morris – General Manager
SUBJECT: **Report on Regular Board of Directors Meeting – September 16, 2026**

The California Community Power (CC Power) Board of Directors held a meeting on September 16, 2026, via Zoom. Details on the Board packet, presentation materials, and public comment letters (if any) can be found under the Meetings tab at the CC Power website: [Meetings and Agendas – ca community power](#)

Highlights of the meeting included the following:

- **Consent Agenda:** The Board approved the following items:
 - Minutes of the Regular Board Meeting held on May 20, 2026
 - Receipt of 2025-2026 Annual Financial Statements (unaudited)
- **Regular Agenda Items:**
 - **Internal Assessment of Financial Operations and Practices – Information Item:** The Board received information about a review of CC Power’s internal financial operations and practices. This review was timed to allow review of financial practices in CC Power prior to and following the first payments, invoices, and member project-account tracking of CC Power’s first online power project (Tumbleweed Energy Storage Project), which came online June 1, 2026, and which involves millions of dollars in recurring financial transactions. The review found that policies, procedures, controls, and invoicing efforts are sound and being followed. The assessment identified that CC Power, serving multiple members through various projects, may need multiple ways to communicate financial information to members and the Board. Banking, audit, accounting, and budgeting practices were also reviewed and deemed sufficient. Enhancements to financial dashboards and information sharing around financial matters are being pursued. Following this assessment, CC Power will now seek to fill a permanent Fractional CFO role to manage internal financial operations. This role was anticipated and included in the Board-approved budget.
 - **Strategic Plan Development and Implementation – Information Item:** The Board received an update on a near-final draft of the 2026–2030 Strategic Plan. The plan is designed to guide CC Power’s efforts to originate, offer, and manage joint projects for member CCAs based on the 2025 Board-approved strategic priorities. The draft plan provides strategic direction for each priority, including guiding principles, goals and outcomes, needed competencies, and related considerations. Board members were asked to provide final input, if any, on the draft plan. A finalized plan is expected to be considered for adoption by the Board later this year.

A Joint Powers Agency whose members are:

Ava Community Energy | Central Coast Community Energy | CleanPowerSF | Peninsula Clean Energy |
Redwood Coast Energy Authority | San José Clean Energy | Silicon Valley Clean Energy | Sonoma Clean Power |
Valley Clean Energy

- **Member Forum – *Information Item*:** The Board received information about the October 29th, 2026, Member Forum. This in-person event will take place at SVCE's offices and will allow for discussion on implementation-level matters associated with the Strategic Priorities.
- **General Manager Report:** The Board was briefed on 1) financial performance, 2) power project updates, 3) project origination updates, 4) administrative updates, 5) contracts entered, and 6) upcoming Board meetings.
- **Closed Session Item(s):**
 - **Public Employee Performance Evaluation matters.** No reportable Board action occurred.



**WestLight Energy
JPA Board Correspondence**

DATE: July 1, 2026

MEETING DATE: September 24, 2026

SPECIAL NOTICE/HEARING: None

VOTE REQUIRED: None

TO: Honorable WestLight Energy Board of Directors

FROM: Brianna Arroyo, Deputy Clerk

SUBJECT: Social Media FAQ's

ATTACHMENTS:

[Social Media Talking Points.pdf](#)

[1-Sheeteer_ Handling Incendiary Comments on Nextdoor \(WestLight\).pdf](#)

Social media FAQs

Here are some helpful tips for responding to frequently asked questions about WestLight Energy (formerly Peninsula Clean Energy) on social media. Frame your response in a way that is accurate, concise, and friendly—all while staying true to WestLight Energy's mission and values. Feel free to adapt these prompts to your own voice, keeping it casual, personable, and polite.

Depending on the social media platform, your response could also encourage people to contact WestLight Energy Support for more information at info@westlightenergy.org or 1-866-966-0110.

Why did Peninsula Clean Energy change their name to WestLight Energy?

WestLight Energy (formerly Peninsula Clean Energy) is the same local electricity provider, just with a new name that is simpler and clearer. WestLight Energy better reflects the communities the organization serves, and this new name helps avoid confusion with PG&E. Nothing else is changing. They're still providing clean electricity, offering the same programs, and supporting the community.

What is WestLight Energy? How is it different from PG&E?

WestLight Energy (formerly Peninsula Clean Energy) is your local community electricity provider. WestLight Energy provides the majority of the electricity supply—97%, in fact—for San Mateo County and Los Banos.

WestLight Energy provides you with electricity from sources like wind, solar, geothermal and hydro, while PG&E delivers it to you through their poles and wires. It's kind of like ordering takeout from your favorite restaurant (WestLight Energy) and having a food delivery service (PG&E) deliver it to your door.

Does WestLight Energy cost more than PG&E?

No! WestLight Energy's rates are lower than PG&E's, so you save money when you're a WestLight Energy customer. You can compare rates here:

https://www.pge.com/assets/pge/docs/account/alternate-energy-providers/pce-sm_rateclasscomparison.pdf

Why was I automatically enrolled?

Your city or county voted to join WestLight Energy to bring cleaner, affordable energy to your community.

Can I opt out of WestLight Energy?

Yes, customers can opt out at any time. However, since WestLight Energy's rates are typically lower than PG&E's, opting out may increase your electricity costs.

**I opted out of WestLight Energy and my bill went down.**

When you opted out of WestLight Energy, PG&E put you on a special temporary rate (TBCC) for six months. Recently, this rate has been lower than WestLight Energy's, which is probably why your bill went down. However, after six months, you'll be switched back to PG&E's regular rates, which are at least 5% higher than WestLight Energy's. So, even though it seems like you're saving money now, your bill will likely go up in the long term.

What clean energy options do I have?

WestLight Energy's standard rate is ECOplus, which is 100% clean, 50% from renewable sources, and cheaper than PG&E. If you want to do even more good for the environment, you can upgrade to ECO100, which is 100% renewable energy for a small 1 to 1.5¢ additional cost.

I have solar power. Why do I still have fees?

WestLight Energy only charges for the electricity you use beyond what your solar panels generate. If your panels produce less energy than your household needs, you'll see charges for the extra electricity you pulled from the grid. If your solar panels generate more energy than you use, WestLight Energy gives you a credit!

Why did my bill go up after switching to WestLight Energy?

In many cases, bill increases are due to PG&E delivery charges, not WestLight Energy generation charges. WestLight Energy works to keep rates stable and has maintained a discount of 5 - 10% since service began in 2016.

How to Handle Comments on Nextdoor

What qualifies as an incendiary comment?

- The post contains aggressive or accusatory language.
- The post spreads misinformation about WestLight Energy's programs, services, or billing—or about clean energy.
- The post escalates negativity within the Nextdoor community, even if the original post is not negative.

How do I know if WestLight Energy should respond?

- ☐ Does the comment contain misinformation that could harm WestLight Energy's reputation?
- ☐ Is the comment receiving significant, negative attention (likes, replies, etc.)?
- ☐ Does responding to the post align with WestLight Energy's values and commitment to candor, transparency, and community support?
- ☐ Is someone asking a question related to WestLight Energy's billing or services?

It may be helpful to respond proactively, even if the original comment isn't particularly negative. This early intervention can help prevent misinformation and keep the community conversation on track.

I found an incendiary comment. What should I do next?

1. **Notify the Marketing team.**

Send an email with the subject line: "Nextdoor comment for review" with a direct link to the post and any necessary screenshots to the following WestLight Energy team members:

- Aleisha Juarez, ajuarez@westlightenergy.org
- Kerstin Grune (cc'd), kgrune@westlightenergy.org
- Gwen Rose (cc'd), grose@westlightenergy.org
- Kirsten Andrews-Schwind (cc'd), kandrews-schwind@westlightenergy.org
- Jayden Hanan (cc'd), jhanan@westlightenergy.org

2. **Be prepared to take action.**

Given Nextdoor's limited access, we may ask you to respond via your personal profile. If the Marketing team confirms that a response is necessary, we will provide you with the appropriate post copy.

Helpful reminders

- When you see a negative Nextdoor comment, be a calm observer and collect details for escalation.
- Do not engage with incendiary comments, unless the Marketing team provides you with copy to post.
- Responses on behalf of WestLight Energy should always reflect the organization's values.
- Stay ahead of the negativity: Responding to questions early can help keep the tone positive and prevent the situation from escalating.



**WestLight Energy
JPA Board Correspondence**

DATE: July 1, 2026

MEETING DATE: September 24, 2026

SPECIAL NOTICE/HEARING: None

VOTE REQUIRED: None

TO: Honorable WestLight Energy Board of Directors

FROM: Nelly Wogberg, Board Clerk

SUBJECT: Acronym List

ATTACHMENTS:

[Acronym Sheet - As of 3-30-26.docx](#)

COMMONLY USED ACRONYMS AND KEY TERMS

AB xx – Assembly Bill xx

ALJ – Administrative Law Judge

AMP - Arrears Management Plans

AVCE - Apple Valley Choice Energy

AQM – Air Quality Management

AVA - AVA Community Energy – Alameda Valley Community Energy, Formally East Bay Community Energy

BAAQMD – Bay Area Air Quality Management District

BLPTA – Buyer Liability Pass Through Agreement

CAISO – California Independent System Operator

CalCCA – California Community Choice Association

CAM – Cost Allocation Mechanism

CAP – Climate Action Plan

CAPP – California Arrearage Payment Program

CARB – California Air Resources Board, or California ARB

CARE - California Alternative Rates for Energy Program

CBA – California Balancing Authority

3CE - Central Coast Community Energy (Formerly Monterey Bay Community Power-MBCP)

CCA – Community Choice Aggregation (aka Community Choice Programs (CCP) or

CCE – Community Choice Energy (CCE)

CCCFA – California Community Choice Financing Authority

CC Power – California Community Power

CEC – California Energy Commission

CEA - Clean Energy Alliance

CPA – Clean Power Alliance

CPSF - Clean Power SF

CPE - Central Procurement Entity

CPP - Critical Peak Pricing

CPSF – Clean Power San Francisco

CPUC – California Public Utility Commission (Regulator for state utilities) (Also PUC)

CRR – Congestion Revenue Rights

CSD – California Department of Community Services and Development

CSGT - Community Solar Green Tariff

Customer Centricity - culture, framework and business strategy based on providing a positive customer experience and building long-term relationships

DA – Direct Access

DAC-GT - Disadvantaged Communities Green Tariff

DER – Distributed Energy Resources

DCE - Desert Community Energy

DERMS – Distributed Energy Resource Management System

DG – Distributed Generation

DOE – Department of Energy

DR – Demand Response

DRP – Demand Response Provider

DRP/IDER – Distribution Resources Planning / Integrated Distributed Energy Resources

EBCE – East Bay Community Energy now known as Ava Community Energy

ECOplus – PCE’s default electricity product, 50% renewable and 50% carbon-free (in 2021)

ECO100 – PCE’s 100% renewable energy product

EDAM – Extended Day-Ahead Market

EDR – Economic Development Rate

EE – Energy Efficiency

EEI – Edison Electric Institute; Standard contract to procure energy & RA

EIR – Environmental Impact Report

ELCC – Effective Load Carrying Capability

EPIC – Energy for Palmdale’s independent Choice

ESP – Electric Service Provider

ESS – Energy Storage Systems

ESSA – Energy Storage Services Agreement

ERRA – Energy Resource Recovery Account

EV – Electric Vehicle

EVSE – Electric Vehicle Supply Equipment (Charging Station)

FERA - Family Electric Rate Assistance Program

FERC – Federal Energy Regulatory Commission

FFS – Franchise Fee Surcharge

GHG – Greenhouse gas

GHG-Free – Greenhouse gas free

GTSR – Green Tariff Shared Renewables

GWh – Gigawatt Hours (Energy) = 1000 MWh

Heavy Duty Vehicle – large vehicles such as busses and long-haul trucks

HPWH – Heat Pump Water Heater

HP HVAC – Heat Pump Heating, Ventilation, and Air Conditioning

HR xx – House of Representatives Bill xx

IDER – Integrated Distributed Energy Resources

IGFC – Income Graduated Fixed Charge

IOU – Investor-Owned Utility (e.g. PG&E, SCE, SDG&E)

IIJA – Infrastructure Investment and Jobs Act

IRA – Inflation Reduction Act

IRP – Integrated Resource Plan

IVR – Interactive Voice Response

ITC – Investment Tax Credit (it’s a solar tax credit)

JCC – Joint Cost Comparison
JPA – Joint Powers Authority
JRC – Joint Rate Comparison
JRM – Joint Rate Mailer
kW – kilowatt (Power)
kWh – Kilowatt-hour (Energy)
LCE – Lancaster Choice Energy
LDV - Light Duty Vehicle - passenger vehicles such as cars and small pickup trucks
LDS – Long Duration Storage
LDES – Long Duration Energy Storage
LIHEAP- Low Income Home Energy Assistance Program
LS - Load Shaping – changing when grid energy is used
LSE – Load Serving Entity
MCE – Marin Clean Energy
MG - Methane Gas - formerly known as 'natural gas'
Microgrid – building or community energy system
MDV - Mid Duty Vehicle – vehicles such as passenger vans
MW – Megawatt (Power) = 1000 kW
MWh – Megawatt-hour (Energy) = 1000 kWh
MTR – Mid-Term Reliability
MUD – Multi-unit Dwelling
NBCs – non-by passable charges
NBT – Net Billing Tariff
NEM – Net Energy Metering
NERC – North American Electric Reliability Corporation
NDA – Non-Disclosure Agreement
NG – Natural Gas

OBF – On-bill Financing

OBR – On-bill Repayment

OCPA – Orange County Power Authority

OES – Office of Emergency Services

OIR – Order Instituting Rulemaking

PACE – Property Assessed Clean Energy

PCC – Portfolio Content Category (aka “buckets”) – categories for RPS compliance

PCC1 – Portfolio Content Category 1 REC (also called bucket 1 REC)

PCC2 – Portfolio Content Category 2 REC (also called bucket 2 REC)

PCC3 – Portfolio Content Category 3 REC (also called bucket 3 REC or unbundled REC)

PCEA – Peninsula Clean Energy Authority

PCIA – Power Charge Indifference Adjustment

PCL – Power Content Label

Pioneer Community Energy

PLA – Project Labor Agreement

POU – Publicly Owned Utility

Pomona Choice Energy

PPA – Power Purchase Agreement

PPSA – Project Participation Share Agreement (CC Power)

PRIME – Pico Rivera innovative Municipal Energy

PSPS – Public Safety Power Shutoff

PV – Photovoltaics (solar panels)

RMEA - Rancho Mirage Energy Authority

RA – Resource Adequacy

RE – Renewable Energy

REC – Renewable Energy Credit/Certificate

RCEA - Redwood Coast Energy Authority

RICAPS - Regionally Integrated Climate Action Planning Suite

RPS – California Renewable Portfolio Standard

S xx – US Senate Bill xx

SB xx – CA Senate Bill xx

SBCE - Santa Barbara Clean Energy

SBP – Solar Billing Plan

SCP – Sonoma Clean Power

SDCP – San Diego Community Power

SJCE – San Jose Clean Energy

SJP - San Jacinto Power

SJVAPCD - San Joaquin Valley Air Pollution Control District

SMD – Share My Data, interval meter data

SQMD – Settlement Quality Meter Data

SVCE – Silicon Valley Clean Energy

TOB – Tariff on Bill

TOU Rates – Time of Use Rates

Valley Clean Energy

VGI – Vehicle-Grid Integration

V2G – Vehicle-to-Grid

VPP – Virtual Power Plant

WECC – Western Energy Coordinating Council

WREGIS – Western Renewable Energy Generation Information System

WSPP – Western Systems Power Pool; standard contract to procure energy and RA

WWGPI - West-Wide Governance Pathways Initiative