Date of Hearing: April 8, 2026

ASSEMBLY COMMITTEE ON UTILITIES AND ENERGY
Cottie Petrie-Norris, Chair
AB 2124 (Pacheco) – As Introduced February 18, 2026

SUBJECT: Electricity and natural gas: legislation imposing mandated programs and requirements: third-party review

SUMMARY: Requires the California Council on Science and Technology (CCST) to establish a program to, upon request of the Legislature, analyze legislation that would establish a mandated requirement or otherwise affect electrical corporation or gas corporation ratepayers, as specified.

Specifically, **this bill**:

1) Requires the CCST on or before January 1, 2027, to establish a program to, upon request of the Legislature and in a manner and pursuant to a timeline agreed to by the Legislature and the council, analyze legislation that would establish a mandated program or requirement or otherwise affect electrical or gas ratepayers, including relevant data on all of the following:

   (a) Whether the legislation will increase electricity or natural gas utility rates, and, if so, the analysis shall assess the potential costs to all categories of ratepayers.

   (b) The potential benefits to all categories of ratepayers resulting from the legislation, with a specific focus on tangible benefits related to the safe, reliable delivery of electricity or natural gas, including whether the legislation is directly related to, or necessary for, the delivery of safe, reliable electricity and natural gas utility service.

   (c) Similar mandated programs or requirements applicable at the time of the analysis, the costs associated with those mandated programs or requirements, and if those mandated programs or requirements are consistent with the state's climate change policy requirements, including, but not limited to, reducing the emissions of greenhouse gases.

   (d) All existing legislatively mandated programs applicable at the time of the analysis that are paid for by the ratepayers of electrical and gas corporations.

   (e) The impacts of the legislation on jobs, the economy, and communities that are identified as disadvantaged.

   (f) Whether the legislation is the most cost-effective and appropriate means to achieve the desired outcomes, including costs and benefits beyond the electricity or natural gas market and non-monetary benefits, such as improvements in environmental quality, public health, and climate stability. If non-monetary societal benefits are noted, the written analysis shall clearly indicate how all Californians would benefit.

   (g) Whether funding sources other than the ratepayers of electrical or gas corporations, such as the General Fund, environmental funds, or other low-income programs, such as CalFresh, could be more appropriately used for the mandated program or requirement.

2) Authorizes requests for analysis to be submitted by the chairperson of the relevant policy or fiscal committee (or committee staff), the Speaker of the Assembly, or the President pro Tempore of the Senate, and requires that the legislation be provided to the council for analysis.

3) Requires the CCST to conduct each analysis using the best available data at the time of the analysis, and requires the state to indemnify, defend, and hold harmless the council and its officers, directors, employees, subcontractors, agents, and expert partners from any claim arising out of the analysis.

4) Requests CCST to develop and implement conflict-of-interest provisions to prohibit a person from participating in conducting an analysis for which the person knows or has reasons to know that the person has a material financial interest, including, but not limited to, a person who has a consulting or other agreement with another person or organization that would be affected by the legislation.

5) Repeals these provisions on January 1, 2032.

EXISTING LAW:

1) Authorizes the California Public Utilities Commission (CPUC) to fix the rates and charges for every public utility, including electrical and gas corporations, and requires those rates and charges be just and reasonable. (Public Utilities Code §451)

2) Requires the CPUC, in establishing residential electric and gas rates, to ensure that the rates are sufficient to enable the electric or gas corporation to recover a just and reasonable amount of revenue. (Public Utilities Code §739(d)(2))

3) Requires the CPUC to prepare a written report on the costs of programs and activities conducted by the four major electric and gas companies regulated by the CPUC. (Public Utilities Code § 913.1)

4) Requires electric, gas, water, and telephone corporations to notify affected customers of proposed revenue changes that will impact their utility bill, by displaying rate impacts of the proposed revenue change in dollars and degree of change (percentage). (Public Utilities Code §454)

5) Requires the CPUC to require each electrical corporation to identify a separate rate component to collect the revenues used to fund certain programs. (Public Utilities Code § 381)

5) Requires the CPUC, in consultation with the California Energy Commission, by December 31, 2026, to develop a framework for assessing, tracking, and analyzing total annual energy costs paid by residential households in California. Requires specified reporting and elements, including:

a) total annual energy costs for residential household energy sources, not limited to, electricity, natural gas, propane, gasoline, and diesel;

b) a requirement for scenarios that may lead to specified reductions in total annual energy costs paid by residential households in 2035 relative to 2024; and

c) an assessment of the actions from the scenarios and their effects on public health, safety, energy system reliability, and achieving the state's clean energy and climate goals

6) Authorizes the CPUC to use the framework for purposes of evaluating any request by an electrical corporation and gas corporation to track new spending eligible for recovery or to adjust a revenue requirement. (Public Utilities Code § 369.5)

6) Establishes that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100% of all retail sales of electricity to California end-use customers and 100% of electricity procured to serve all state agencies by December 31, 2045. (Public Utilities Code § 454.53)

7) Urges the President of the University of California, in collaboration with the Presidents' of the University of Southern California, the California Institute of Technology, Stanford University, and the Chancellor of the California State University, to establish the California Council on Science and Technology (CCST). CCST reports to the president and chancellor and responds appropriately to the Governor and Legislature on public policy issues significantly related to science and technology. Membership of CCST is comprised of academia, experts, scientists and engineers from California. Assembly Concurrent Resolution 162, (Farr, 1988)

8) Requests the California Council on Science and Technology (CCST), every three years and at its discretion, to assess the infrastructure project types, scale, and pace needed to achieve the state's energy, climate, and air quality goals. (Health & Safety Code § 38592.1)

9) Provides independent analysis of legislation proposing to mandate a benefit or healthcare related service through the California Health Benefits Review Program and a National Advisory Council. (Health and Safety Code § 127660-127665)

10) Provides independent analysis of legislation proposing to mandate a benefit or healthcare related service through the California Health Benefits Review Program and a National Advisory Council. (Health and Safety Code § 127660-127665)

FISCAL EFFECT: Unknown. This bill is keyed fiscal and will be referred to the Committee on Appropriations for its review.

BACKGROUND:

The Burden of Rising Utility Costs – California's electricity rates are among the highest in the nation. Currently, the state has the second highest residential electricity rates after Hawaii, with average rates that are close to double the national average.[1] Similarly, California has the 10th-highest average residential natural gas prices of any of the states. Rates refer to the amount paid per unit of energy (e.g., per kilowatt-hour), while bills reflect the total monthly amount paid by a customer. Despite high rates, the actual electric bill the average California residential and industrial customer pays is below the national average. This is largely attributable to the state's mild climate and longstanding investments in energy efficiency, which reduce overall energy consumption.[2] However, affordability challenges persist. According to the PAO as of late 2024 **(**based on October 2024 utility filings)**,** nearly 2.2 million customers of the state's three largest utilities are behind on their bills, with an average of $821 owed, with low-income households carrying a disproportionate share of arrearages.[3]

Primary Drivers of High Utility Bills – The PAO has reported that the primary drivers of electric utility cost increases in recent years, as illustrated in Figure 1,[4] include wildfire mitigation, distribution and transmission infrastructure investments, and rooftop solar incentives provided through net energy metering (NEM) programs. A 2023 report by the State Auditor reached similar conclusions, identifying wildfire-related costs and insurance as a key driver of rising utility expenses**.** The report also found that declining electricity sales associated with increased rooftop solar adaption have required investor-owned utilities IOUs) to raise rates to recover fixed costs over a reduced volume of electricity sales. The audit further identified increases in IOU operating costs as an additional contributing factor**,** including higher distribution costs for PG&E, increased administrative costs for Southern California Edison (SCE), and elevated property and non-income tax expenses for San Diego Gas & Electric (SDG&E)**.** While many of these cost drivers are associated with core utility functions (e.g., distribution system investments) or from how utilities perform those functions (e.g., wildfire mitigation), others are policy-driven or externally imposed and may not directly reflect the provision of electric service (e.g., NEM incentives), despite their material impact on rates.

A 2023 report by the State Auditor concurs with those findings— that wildfire costs, including insurance, are a key factor in increased utility expenses.[5]Decreasing electricity sales due to solar system adoption was noted to have led to investor-owned utilities (IOUs) raising rates to recover fixed costs. Further, the audit found increases in IOU operating costs, which may be inclusive of these other categories, as contributing to increased rates; specifically, distribution costs for PG&E, administrative costs for Southern California Edison (SCE), and higher property and non-income taxes for San Diego Gas and Electric (SDG&E). While many of these costs are associated with core utility functions (e.g., distribution) or result from how utilities carry out those functions (e.g., wildfire mitigation), others are policy-driven or externally imposed (e.g., solar incentives) and do not directly reflect the cost of providing electric service.

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[1] Pg.12, Legislative Analyst office, *Assessing California's Climate Policies— Residential Electricity Rates in California;* January 2025
[2] Data from the U.S. Energy Information Administration EIA-861 schedules 4A-D, EIA-861S and EIA-861U; https://www.eia.gov/electricity/sales_revenue_price/pdf/table5_a.pdf and https://www.eia.gov/electricity/sales_revenue_price/pdf/table5_c.pdf
[3]November 2023 Disconnection Settlement Monthly Reports of PG&E, Southern California Edison, and SDG&E (R.18-07-005).
[4] Slide 6, PAO slidedeck "Q4 2023 Electric Rates Report;" January 19, 2024; https://www.publicadvocates.cpuc.ca.gov/-/media/cal-advocates-website/files/press-room/reports-and-analyses/240119-caladvocates-q4-2023-quarterly-rate-report.pdf
[5] Pg. 3, California State Auditor Report; "Electricity and Natural Gas Rates"; August 2023

In an analysis by the CPUC, increases in natural gas rates in recent years, as seen in Figure 2, were primarily driven by increased commodity prices, which felt upward pressure from gas market conditions, colder winter weather, and gas pipeline infrastructure and storage issues.[6]Due to a mild 2023 winter, natural gas rates have come back down.[7] The State Auditor's report had similar findings to the CPUC on the causes for increasing natural gas rates.[8]

Figure 1. California IOU <u>electric</u> rates over recent years

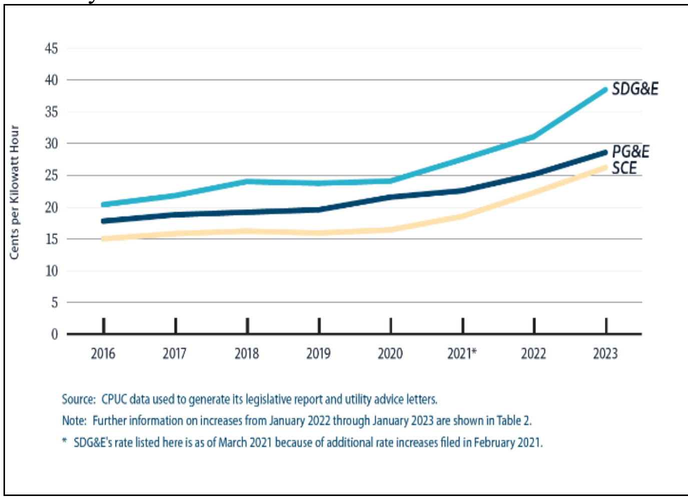
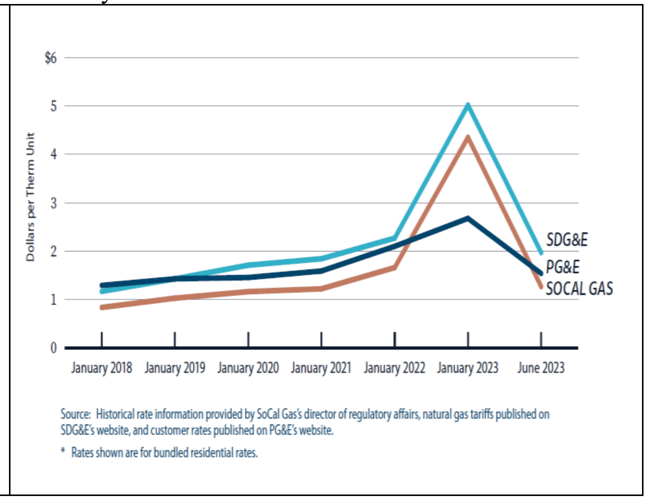


Figure 2. California IOU <u>natural gas</u> rates over recent years



Components of an Electric Bill – In **Figure 3**, as shared by the Public Advocates Office, a typical residential electric bill is comprised of three components:[9]

1. Procurement Costs – Costs to procure electricity from generation sources, including power purchase agreements and fuel costs.

2. Transmission & Distribution (T&D) – Costs to move the electricity from generation sources to homes and businesses. Distribution costs are approved by the CPUC, while transmission costs are primarily regulated by the Federal Energy Regulatory Commission (FERC).

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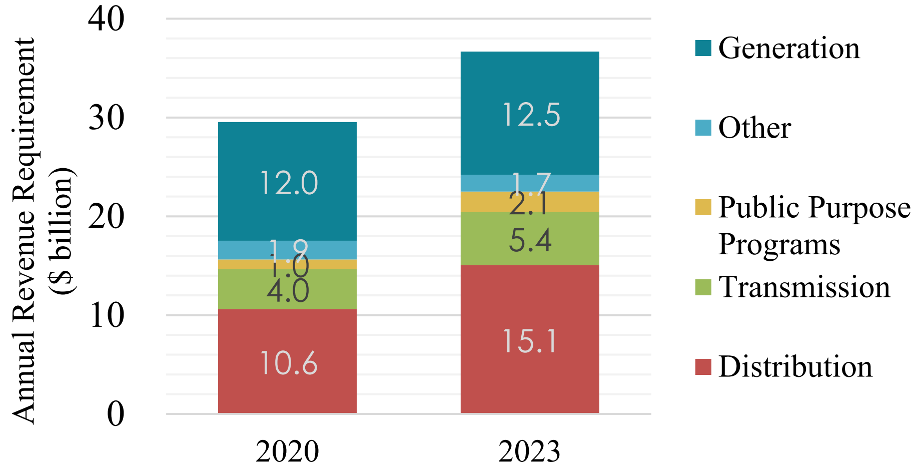
[6] CPUC; "2022 California Electric and Gas Utility Costs Report: AB 67 Annual Report to the Governor and Legislature"; April 2023.
[7] CPUC; "Utility Costs and Affordability of the Grid of the Future: An Evaluation of Electric Costs, Rates, and Equity Issues Pursuant to P.U. Code Section 913.1"; May 2021.
[8] Pg.2; State Auditor; "Electricity and Natural Gas Rates: The California Public Utilities Commission and Cal Advocates Can Better Ensure That Rate Increases are Necessary"; August 2023.
[9] While this basic categorization of costs reflects major areas of utility operations, it is also used to determine what portions of utility costs should be paid by different types of customers. For instance, some customers do not receive full or bundled service from the utility and may generate their own electricity on site or buy electricity from a non-utility source (e.g., an Electric Service Provider (ESP), or a CCA). Customers who receive electricity from a CCA or ESP do not typically pay generation costs but do pay transmission and distribution costs. However, these customers are also required to pay non-bypassable charges for generation procured on their behalf before they departed from bundled service. Additionally, some larger customers receive service at transmission voltage levels and are not charged for use of the utility distribution system.

3. Public Purpose Surcharge & Other – Costs associated with state-mandated programs and policy objectives funded by ratepayers, including the California Alternate Rates for Energy (CARE) program, energy efficiency programs and research programs, among others.



Specifically, **Figure 3** illustrates the combined revenue requirement (PG&E, SCE, SDG&E) in 2020 vs. 2023, in which costs increased by category: 43% for distribution, 35% for transmission, 110% for PPPs, and only 4% for generation (procurement) costs. These data suggest that growth in rates is driven predominantly by the cost of transmission, distribution and ratepayer-funded programs, rather than generation (procurement). This trend goes beyond 2023. Between January 2023 and April 2024, total revenue requirements increased, with wildfire-related costs making up about 10% to 24% of total revenue requirements, depending on the utility.[10]

Annual CPUC Report – The CPUC already evaluates the costs of utility programs. AB 67 (Levine, Chapter 562, Statutes of 2005) requires the CPUC to prepare a written report on the costs of programs and activities being undertaken by the four IOUs: PG&E, SCE, SDG&E, and Southern California Gas Company (SoCalGas). This legislation was enacted in part to determine the outcome of numerous legislative and administrative mandates, and to provide more transparency into the drivers of electric and gas rates. The report is to be submitted to the Governor and the Legislature by April 1st of each year and is required to include the following:

i. Each program mandated by statute and its annual cost to ratepayers.
ii. Each program mandated by the CPUC and its annual cost to ratepayers.
iii. Energy purchase contract costs and bond-related costs (commonly known as Department of Water Resources (DWR) related costs).
iv. All other accumulated categories of costs currently recovered in retail rates as determined by the CPUC.

2023 Costs of Legislative Programs – The California Legislature has mandated a number of public policy programs that IOUs operate, as illustrated in **Table 1**[11]. However, this reflects a partial list. Many of these programs aim to provide the state with clean energy, while some

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[10] PAO; "2023-2024 Wildfire-Related Cost Increases of California's Three Major Investor-Owned Electric Utilities"; https://www.publicadvocates.cpuc.ca.gov/press-room/reports-and-analyses/wildfire-cost-increases-of-california-electric-ious
[11] Pg. 82-83, "2024 AB 67 Annual Report to the Governor and Legislature Report"; September 2025.

programs provide subsidies to various customer groups. Some bonds and regulatory fees may also be mandated by the State.

Table 1 shows the 2024 electric revenue requirement for some programs required by state law with varying purposes (*Dollars in Thousands ($000)*.[12]

Program	Legislation	PG&E	SCE	SDG&E	Total
Renewable Portfolio Standard	AB 32, SB 1078, SB 350, SB 100	1,888,270	2,449,949	506,239	4,840,458
Wildfire Fund Non-Bypassable Charge	AB 1054 (Holden, Burke, and Mayes, 2019)	393,053	408,912	84,674	886,639
Energy Efficiency	SB 350, AB 1330, AB 802, AB 32, AB 1890, AB 841	159,005	288,997	32,776	480,778
Energy Savings Assistance Program/California Alternate Rates for Energy (CARE) Program Administrative Expense	Public Utilities Code § 2790, §382, SB 580, SB 691, AB 327, AB 793, AB 2140, AB 2857	1,019,380	929,330	207,446	2,156,156
School Energy Efficiency Stimulus Program	AB 841(ting, 2020)	0	0	2,900	2,900
Self-Generation Incentive Program	SB 700, AB 970, AB 1144	59,877	56,626	22,022	138,525
Total		**3,519,585**	**4,133,814**	**856,057**	**8,505,456**

Each of these illustrative programs above, and others reported in the CPUC's annual AB 67 report, has a purpose(s) that prompted the Legislature and the Governor at the time to create them. This ranges from increasing renewable energy resources, increasing energy efficiency programs, supporting low-income households, incentivizing the use of distributed energy resources, and others. Each program has a purpose, and a cost to match.

COMMENTS:

1) *Author's Statement*. According to the author, "Californians are struggling with soaring costs of goods and services, and low-income customers are disproportionately burdened. The monthly strain created by utility bills is more pronounced than ever before. According to the January 2025 Legislative Analyst's Office (LAO) report on residential

[12] Pg. 66-68, "2023 AB 67 Annual Report to the Governor and Legislature Report"; April 2024. https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2025/2025-sb-695-report_093025.pdf

electricity rates, California's residential electricity rates are now the second highest in the nation, nearly double the national average. Rates have surged in California by about 47 percent from 2019 to 2023, far outpacing the overall 18 percent increase in consumer prices. AB 2124 requires the California Council on Science and Technology (CCST) to conduct a review of every legislative proposal that mandates or requires services or programs that result in increased costs for electrical or natural gas corporation customers. The CCST would prepare a written analysis with relevant data on the efficacy, cost impact and overall effect of each proposed mandate before a vote in legislative policy committees."

2) *Purpose of the bill*. AB 2124 is based on two contentions: first, that utility rates have been extremely high in recent years, and second, that state policy decisions can influence utility rates. Utilities are making significant investments in wildfire mitigation, transmission, infrastructure upgrades, transportation electrification, and decarbonization. These investments are generally reviewed in CPUC proceedings, such as General Rate Cases and Wildfire Mitigation Plan proceedings, and, if approved, the associated costs are recovered by customers through rates. In addition, emerging large loads, including data centers, have raised related questions about infrastructure planning and how the costs of necessary upgrades should be allocated among customers.

   As California implements its clean energy and climate policies, utilities are often directed to implement new programs funded through rates rather than the state General Fund. Legislative committees regularly consider bills that would impose new requirements on utilities or expand existing programs, and those measures are evaluated by the Legislature's two fiscal committees for their ratepayer and fiscal impacts. However, due to established legislative deadlines, committees may not have sufficient time to conduct detailed analysis of ratepayer impacts before a bill is voted on by members of the Legislature. Providing independent cost estimates would help inform those deliberations by giving Members a clearer understanding of a bill's potential ratepayer impacts before a vote. Therefore, AB 2124 could improve the information available to Members when evaluating measures.

3) *Example nearer at hand.* The California Health Benefits Review Program (CHBRP) was established in 2002 to provide independent analysis of the medical, financial, and public health impacts of proposed health insurance benefit mandates. CHBRP evaluates the medical effectiveness, cost and coverage impacts, and public health outcomes of proposed legislation to inform policymaking. A team of analytic staff at UC Berkeley works with faculty from several UC campuses, as well as consultants, to complete each analysis in a 60-day period, typically prior to formal legislative consideration of the bill in a committee. Each report summarizes scientific evidence but does not make recommendations, deferring policy decision-making to the Legislature. The program is funded through an annual assessment of health plans and insurers in California. CHBRP typically analyzes approximately 15 to 20 bills annually, with the number varying each year based on the volume of health insurance benefit mandate legislation referred by the Legislature.

4) *Authority Without Funding.* AB 1083 (Burke, Chapter 818, Statutes of 2019) authorized the California Council on Science and Technology (CCST) to conduct independent analyses of energy-related legislation upon request of specified legislative leaders and

committees, with analyses to be completed within 60 days. However, the program was contingent on the availability of funding, which was never appropriated. As a result, CCST did not perform analyses under this authority, and the program was not operational before it sunset on January 1, 2023.

5) *Institutional Fit.* The CCST was established to provide independent, science-based, and evidence-based advice to inform state policymaking and regularly convenes subject-matter experts from academia, industry, and research institutions. CCST has indicated that its model includes engaging experts with experience in utility ratemaking, energy markets, and utility regulation. This structure may allow CCST to bring in the relevant expertise needed to evaluate complex ratepayer and cost impacts.

   In considering which entity is best positioned to conduct this analysis, the author may also wish to evaluate whether other academic institutions within the University of California system could serve a similar role. For example, the University of California Energy Institute, a multi-campus research unit based at the UC Berkeley Haas School of Business, has established expertise in energy policy and is widely recognized for its contributions to environmental and energy analysis. Leveraging existing expertise within the University of California system or other research entities may provide additional capacity or specialized knowledge; however, it is unclear whether such entities have the capacity or willingness to take on this role.

6) *Mandate Without Funding.* AB 2124 authorizes the California Council on Science and Technology (CCST) to conduct independent analyses of legislative proposals that may impose new ratepayer-funded programs or requirements. However, the bill does not identify a dedicated or ongoing funding source to support this work. *Therefore, the Committee recommends including a provision making implementation of this measure contingent upon legislative appropriation.*

7) *Cost-Effective and Appropriate Standard.* Subdivision (b)(1)(F) requires the analysis to determine whether the legislation is the "most cost-effective and appropriate" means to achieve the desired outcomes, including consideration of costs and benefits beyond the electricity or natural gas market and nonmonetary benefits, such as improvements in environmental quality, public health, and climate stability. This provision requires judgments about cost-effectiveness and what constitutes an "appropriate" approach. Some impacts, particularly non-monetary effects such as environmental or public health outcomes, may be difficult to quantify and may be interpreted differently. However, CCST's role is to provide objective analysis to support legislative deliberations, while determinations of cost-effectiveness and appropriateness are made by the Legislature. *As such, the Committee recommends clarifying that the analysis is intended to provide a descriptive assessment of costs, benefits, and impacts, rather than determine what is "most cost-effective and appropriate."*

8) *Funding Source Determination*. Subdivision (b)(1)(G) requires the analysis to assess whether funding sources other than ratepayers, such as the General Fund, environmental funds, or low-income programs like CalFresh, could be more appropriate to support the mandated program or requirement. This requirement calls for a determination as to whether one funding source is more appropriate than another. Therefore, the analysis may extend beyond identifying funding sources and into determining a preferred funding

approach. What is "appropriate" is determined by the Legislature, with CCST providing objective, informational analysis to support those policy decisions. *As a result, the Committee recommends clarifying that the analysis identifies and compares potential funding sources, rather than determining which source is most appropriate to fund the program*.

9) *Prior Legislation.*

AB 1912 (Pacheco, 2024), an early version would have requested the California Council on Science and Technology (CCST) to establish by January 1, 2026, a program to, upon request of the Legislature, assess legislation that would establish a mandated requirement or program or otherwise affect electrical ratepayers. It was later amended to apply to PAO. Status: Held under submission in the Senate Committee on Appropriations.

SB 429 (Bradford, 2023), a previous version of this bill, required investor-owned natural gas utilities to provide customers with an annual credit (known as the California Climate Credit) to coincide with the highest usage month, on or as close to the February utility billing cycle, as feasible. Status: amended outside this committee's jurisdiction; pending hearing in the Assembly Committee on Appropriations.

AB 2765 (Santiago, 2022) would have eliminated from electric IOU rates the costs of various programs, including utility bill discount programs for low-income customers, and instead established a Public Utilities Public Purpose Programs Fund in the State Treasury to fund the programs. Status: Held under submission in the Assembly Committee on Appropriations

AB 205 (Committee on Budget), among its many provisions, provided an additional $1.2 billion to cover outstanding energy utility arrears accrued during the COVID-19 pandemic, and made other programmatic changes. Status: Chapter 61, Statutes of 2022.

AB 135 (Committee on Budget) provided over $2 billion in relief for customer energy debt accrued during the pandemic. Status: Chapter 85, Statutes of 2021.

AB 1083 (Burke) requested the California Council on Science and Technology, if the Council determines it has sufficient funds, to undertake and complete an analysis of the effects of legislation proposing to mandate procurement of electricity products, upon request. Status: Chapter 818, Statutes of 2019.

SB 695 (Kehoe) required the CPUC to annually report on recommendations for actions that can be undertaken during the succeeding 12 months to limit utility cost and rate increases, consistent with the state's energy and environmental goals. Status: Chapter 337, Statutes of 2009.

AB 67 (Levine) requires the CPUC to prepare a written report on the costs of programs and activities conducted by the four major electric and gas companies regulated by the CPUC. Status: Chapter 562, Statutes of 2005.

SB 608 (Leonard) provides funding to strengthen ORA autonomy over its budget and staffing resources. Chapter 440, Statutes of 2005.

AB 1996 (Thomson) requested the University of California to prepare a written analysis with relevant data on the medical, economic, and public health impacts of such proposed legislation, which then became the California Health Benefits Review Program (CHBRP). Status: Chapter 795, Statutes of 2002.

SB 608 (Leonard) restructured the Division and renamed it the Office of Ratepayer Advocates (ORA) to "obtain the lowest possible rate for service consistent with reliable and safe service levels". The statute also directed the CPUC to assign personnel and resources to the division sufficient to "ensure that customer and subscriber interests are effectively represented in all significant proceedings and forums. Status: Chapter 856, Statutes of 1996.

REGISTERED SUPPORT / OPPOSITION:

Support

California Chamber of Commerce
California Council for Environmental & Economic Balance (CCEEB)
California Large Energy Consumers Association
California State Association of Electrical Workers
Coalition of California Utility Employees
Edison International and Affiliates, Including Southern California Edison
Pacific Gas and Electric Company and its Affiliated Entities
San Diego Gas and Electric Company
Southern California Gas Company

Opposition

None on file.

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