

**REGULATORY UPDATE FOR APRIL 15, 2025  
(WEEK OF APRIL 7, 2025)**

**EXECUTIVE ORDERS**

On April 8, President Trump issued three Executive Orders (EOs), [Strengthening The Reliability And Security Of The United States Electric Grid](#), [Protecting American Energy From State Overreach](#), and [Reinvigorating America's Beautiful Clean Coal Industry And Amending Executive Order 14241](#), and a proclamation, [Regulatory Relief For Certain Stationary Sources To Promote American Energy](#).

- **Strengthening The Reliability And Security Of The United States Electric Grid** directs the Secretary of Energy, within 30 days of the date of the EO, to develop a uniform methodology for analyzing current and anticipated reserve margins for all regions of the bulk power system regulated by the Federal Energy Regulatory Commission and use the methodology to identify current and anticipated regions with reserve margins below acceptable thresholds. Additionally, the Secretary of Energy is directed to establish a process by which the aforementioned methodology and any analysis and results it produces, are assessed on a regular basis, and a protocol to identify which generation resources within a region are critical to system reliability. The protocol will be used to prevent, as the Secretary of Energy deems appropriate and consistent with applicable law, including section 202(c) of the Federal Power Act, an identified generation resource in excess of 50 megawatts of nameplate capacity from leaving the bulk power system or converting the source of fuel of such generation resource if such conversion would result in a net reduction in accredited generating capacity, as determined by the reserve margin methodology.
- **Protecting American Energy From State Overreach.** This EO directs the Attorney General, in consultation with the heads of appropriate executive departments and agencies, to identify all state and local laws, regulations, causes of action, policies, and practices (collectively, State laws) burdening the identification, development, siting, production, or use of domestic energy resources that are or may be unconstitutional, preempted by federal law, or otherwise unenforceable. The Attorney General is directed to prioritize the identification of “any such State laws purporting to address ‘climate change’ or involving ‘environmental, social, and governance’ initiatives, ‘environmental justice,’ carbon or ‘greenhouse gas’ emissions, and funds to collect carbon penalties or carbon taxes.” Next, the Attorney General is directed to expeditiously take all appropriate action to stop the enforcement of State laws and continuation of civil actions thus identified. Within 60 days of the date of the EO, the Attorney General must submit a report to the President, through the Counsel to the President, regarding actions and recommend any additional presidential or legislative action necessary to stop the enforcement of the State laws identified or that otherwise fulfill the purpose of this EO.

- **Reinvigorating America’s Beautiful Clean Coal Industry and Amending Executive Order 14241.** The EO directs the following actions:
  - The Chair of the National Energy Dominance Council (NEDC) must designate coal as a “mineral” as defined in section 2 of Executive Order 14241 of March 20, 2025 (Immediate Measures to Increase American Mineral Production), thereby entitling coal to all the benefits of a “mineral” under that order.
  - Within 60 days of the date of this EO, the Secretary of the Interior, the Secretary of Agriculture, and the Secretary of Energy must submit a consolidated report to the President through the Assistant to the President for Economic Policy that identifies coal resources and reserves on federal lands, assesses impediments to mining such coal resources, and proposes policies to address such impediments and ultimately enable the mining of such coal resources by either private or public actors. The Secretary of Energy must include an analysis of the impact that the availability of the coal resources identified could have on electricity costs and grid reliability in the report.
  - The Secretary of the Interior and the Secretary of Agriculture are directed to prioritize coal leasing and related activities as the primary use for the public lands with coal resources identified in the report and expedite coal leasing in these areas, including by utilizing emergency authorities available to them and identifying opportunities to provide for expedited environmental reviews.
  - The Secretary of the Interior, pursuant to the authorities in the Mineral Leasing Act of 1920, the Mineral Leasing Act for Acquired Lands of 1947, and the Multiple Mineral Development Act of 1954 (30 U.S.C. 521-531 *et seq.*) must publish a notice in the Federal Register terminating the “Environmental Impact Statement Analyzing the Potential Environmental Effects from Maintaining Secretary Jewell’s Coal Leasing Moratorium” and process royalty rate reduction applications from federal coal lessees in as expeditious a manner as permitted by applicable law.
  - Within 30 days of the date of this EO, the Administrator of the Environmental Protection Agency, the Secretary of Transportation, the Secretary of the Interior, the Secretary of Energy, the Secretary of Labor, and the Secretary of the Treasury must identify any guidance, regulations, programs, and policies within their respective executive department or agency that seek to transition away from coal production and electricity generation.
  - Within 60 days of the date of this EO, the heads of all relevant executive departments and agencies must consider revising or rescinding federal actions identified that seek to transition the nation away from coal production and electricity generation.
  - Agencies that are empowered to make loans, loan guarantees, grants, equity investments, or conclude offtake agreements, both domestically and abroad, are also directed to take steps to rescind any policies or regulations seeking to or that actually discourage investment in coal production and coal-fired electricity

- generation, such as the 2021 U.S. Treasury Fossil Fuel Energy Guidance for Multilateral Development Banks.
- Within 30 days of the date of this EO, the Secretary of State, the Secretary of Agriculture, the Secretary of Commerce, the Secretary of Energy, the Chief Executive Officer of the International Development Finance Corporation, the President of the Export-Import Bank of the United States, and the heads of all other agencies that have discretionary programs that provide, facilitate, or advocate for financing of energy projects must review their charters, regulations, guidance, policies, international agreements, analytical models, and internal bureaucratic processes to ensure that such materials do not discourage the agency from financing coal-mining projects and electricity-generation projects. Where appropriate, any identified preferences against coal use shall immediately be eliminated except as explicitly provided for in statute.
  - The Secretary of Commerce, in consultation with the Secretary of State, the Secretary of Energy, the United States Trade Representative, the Assistant to the President for National Security, and the heads of other relevant agencies, must take all necessary and appropriate actions to promote and identify export opportunities for coal and coal technologies and facilitate international offtake agreements for United States coal.
  - Within 30 days of the date of this EO, each agency must identify to the Council on Environmental Quality any existing and potential categorical exclusions pursuant to the National Environmental Policy Act that agencies could utilize to further the production and export of coal.
  - The Secretary of Energy, pursuant to the authority under the Energy Act of 2020, must determine whether coal used in the production of steel meets the definition of a “critical material” under the Act and, if so, shall take steps to place it on the Department of Energy Critical Materials List.
  - The Secretary of the Interior, pursuant to the authority under the Energy Act of 2020, must determine whether metallurgical coal used in the production of steel meets the criteria to be designated as a “critical mineral” under the Act and, if so, take steps to place coal on the Department of the Interior Critical Minerals List.
  - Within 60 days of the date of this EO, the Secretary of the Interior, Secretary of Commerce, and the Secretary of Energy must identify regions where coal-powered infrastructure is available and suitable to support artificial intelligence (AI) data centers; assess the market, legal, and technological potential for expanding coal-based infrastructure to power data centers to meet the electricity needs of AI and high-performance computing operations; and submit a consolidated summary report with their findings and proposals to the Chair of the NEDC, the Assistant to the President for Science and Technology, and the Special Advisor for AI and Crypto.
  - The Secretary of Energy is directed to take all necessary actions to accelerate the development, deployment, and commercialization of coal technologies including, but not limited to, utilizing all available funding mechanisms to support the expansion of coal technology, including technologies that utilize coal and coal byproducts such as building materials, battery materials, carbon fiber, synthetic

- graphite, and printing materials, as well as updating coal feedstock for power generation and steelmaking.
- Within 90 days of the date of this EO, the Secretary of Energy must submit a detailed action plan to the President through the Chair of the NEDC outlining the funding mechanisms, programs, and policy actions taken to accelerate coal technology deployment.
- **Regulatory Relief For Certain Stationary Sources To Promote American Energy** exempts certain stationary sources from a May 7, 2024 amendment to the Mercury and Air Toxics Standards (MATS) rule for a period of two years beyond the compliance date – *i.e.*, for the period beginning July 8, 2027, and concluding July 8, 2029. During this two-year period, these stationary sources will remain subject to the compliance obligations that they are currently subject to under the MATS as the MATS existed prior to the May 7, 2024 amendment.

## CALIFORNIA PUBLIC UTILITIES COMMISSION (CPUC OR COMMISSION)<sup>1</sup>

### Proposed Decisions and Resolutions

Resolution E-5374 (Pacific Gas and Electric, Southern California Edison, and San Diego Gas & Electric Resolving Virtual Net Billing Tariff and Virtual Net Energy Metering Tariffs). This resolution adopts with modifications Pacific Gas and Electric (PG&E), Southern California Edison (SCE), and San Diego Gas & Electric's (SDG&E) Virtual Net Billing Tariff (VNBT) and Virtual Net Energy Metering (VNEM) tariffs, including Solar on Multifamily Affordable Housing and Multifamily Affordable Solar Housing. The resolution rejects PG&E, SCE, and SDG&E's joint proposal to allow a VNBT or VNEM renewable energy system for the primary use of a single customer to support the option of emergency grid-charging of integrated storage. The resolution also directs PG&E, SCE, and SDG&E to modify the VNBT and VNEM tariffs to allow benefiting account customers to access multiple tariffs. Within 30 business days of the effective date of the resolution. PG&E, SCE, and SDG&E must submit Tier 2 advice letters, one submittal per tariff, demonstrating conformance with the modifications.

### Voting Meeting

The CPUC will hold a [voting meeting](#) in Sacramento, California on April 24, 2025 at 11:00 am PT.

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

### Upcoming Events and Workshops

*Submetering and Telematics Workshop (Transportation Electrification).* The CPUC hosted a workshop on Tuesday, April 15, 2025 from 10:00 am to 4:00 pm PT, to discuss submetering and telematics issues relating to utility efforts to adopt plug-in electric vehicle protocols. Discussions focused on implementation challenges, timing targets, and stakeholder input. A link to the virtual workshop is available [here](#).

*Vehicle-Grid-Integration (VGI) Forum.* The CPUC is convening an in-person VGI Forum on Wednesday, April 16, 2025, 9:00 am to 4:30 pm PT. The forum will be conducted by IOUs (PG&E, SCE, and SDG&E) and will be centered around the following issues: 1) rates and demand flexibility programs; 2) technology enablement; and 3) planning. Attendees should register [here](#), and a remote viewing option will be available for those unable to attend in-person.

*High DER Scenario Planning Workshop (R.21-06-017).* On Tuesday, April 22, 2025 from 9:00 am to 3:30 pm the CPUC will host both an in-person (CPUC Auditorium) and remote ([Webex link](#)) webinar to discuss High DER Scenario Planning, consistent with the direction of the Commission's decision D.24-10-030. The workshop will be recorded and made available on the CPUC's [Distribution Planning webpage](#).

### CALIFORNIA INDEPENDENT SYSTEM OPERATOR (CAISO)

#### Stakeholder Initiatives: Upcoming Meetings and Deadlines

**Interconnection Process Enhancements 2023.** CAISO has posted updated Track 3 draft tariff language to its website, available [here](#).

**2024-2025 Transmission Planning Process.** CAISO held a public stakeholder call for the 2024-2025 Transmission Planning Process to discuss the 2024-2025 draft transmission plan on April 15, 2025. Written comments on the draft transmission plan are due April 29, 2025. Further information is available [here](#).

**Western Energy Imbalance Market.** CAISO will host a stakeholder call regarding a new initiative: the Western Energy Imbalance Market Assistance Energy Transfer (AET) Extension on April 16, 2025. CAISO intends for this to be a limited initiative that targets a potential extension of the AET product, past its December 31, 2025, sunset date. The agenda will include analysis and discussion of the existing AET product performance since its inception. Further information is available [here](#).

**Gas Resource Management.** CAISO will host a working group webinar on April 16, 2025, to align on scope and prioritization for the Gas Resource Management policy initiative. Written comments are due by April 30, 2025. Further information is available [here](#).

**DAME, EDAM, and EDAM Implementation Market Simulation.** CAISO invites all market participants intending to participate in the Day-Ahead Market Enhancements (DAME), Extended Day-Ahead Market (EDAM), and EDAM CAISO Participation Rules implementations

to register for the upcoming market simulation activities starting May 2025. CAISO will hold weekly market simulation meetings to support connectivity testing, integration testing, and market simulation execution. Registration is due April 22, 2025. The first meeting is set for Thursday, April 24 at 1:00 pm. Further information is available [here](#).

## **CALIFORNIA ENERGY COMMISSION (CEC)**

### **2024 Integrated Energy Policy Report (IEPR) Update**

The CEC is working on its 2024 IEPR Update, and ongoing workshops were held through December 2024 to develop the record. The policy recommendations included in the 2024 IEPR Update will be based on the record developed during the proceedings, including data and technical analyses by staff and stakeholders. Comments on the draft IEPR were due in early January 2025. According to the [workshop schedule](#) published in December 2024 (which is subject to change), potential adoption of the 2024 IEPR Update was initially scheduled for the March 17, 2025 Business Meeting. However, upon review of the March 17 meeting [agenda](#), there is no mention of the 2024 IEPR Update. Thus, the 2024 IEPR Update remains in [draft form](#).

### **2025 IEPR**

The CEC has released the 2025 IEPR [workshop schedule](#) and opened a new proceeding number ([25-IEPR-01](#)). Workshop topics and dates included in the notice are below (note: the workshop schedule is subject to change):

- May 7, 2025: IEPR Staff Workshop on Electricity Forms & Instructions (remote access only)
- June 16, 2025: IEPR Commissioner Workshop on Interconnection
- June 25, 2025: IEPR Commissioner Workshop on Load Flex Goal Analysis Update
- July 29, 2025: IEPR Commissioner Workshop on Hydrogen (SB 1075) and Zero Carbon Resource (SB 423)
- August 6, 2025: IEPR Commissioner Workshop on Inputs & Assumptions (remote access only)
- August 26, 2025: IEPR Commissioner Workshop on Load Modifier Design (remote access only)
- November 13, 2025: IEPR Commissioner Workshop on Load Modifier Results (remote access only)
- December 2, 2025: IEPR Commissioner Workshop on Forecast (hybrid workshop)

### **2024 Renewables Portfolio Standard Annual Reporting Requirements**

CEC staff will host a webinar on May 7, 2025, at 10:00 am PT to provide load-serving entities with an overview of the [annual reporting](#) process and forms required for submission in advance of the July 1, 2025 reporting deadline for the 2024 compliance year. The webinar can be accessed [here](#), and the password is: 278325.



### 2025 California Demand Flexibility Summit

The CEC will host the California Demand Flexibility Summit at the UC Davis Conference Center on May 22, 2025. According to the Save the Date, issued in February, the summit will provide an “opportunity to discuss the progress and challenges in achieving California’s load shift goal of 7,000 megawatts by 2030.” Registration for the California Demand Flexibility Summit is [now open](#).

### Zero-Emission Vehicles

#### *Port Infrastructure*

The CEC announced a grant funding opportunity for medium- and heavy-duty (MDHD) zero emission vehicle port infrastructure. The program includes up to \$40 million in grant funds for either MDHD electric refueling infrastructure or hydrogen refueling infrastructure for California seaports and land ports of entry.

#### *Depot Infrastructure*

The CEC has announced the availability of up to \$20 million in grant funds under the Clean Transportation Program to support the deployment of depot charging and hydrogen refueling infrastructure for MDHD vehicles. A pre-application workshop is scheduled for April 21 from 9:00 am to 11:00 am PT. Access information is available on the event page, [here](#).

### CEC Business Meetings

The next CEC Business Meeting is scheduled for April 24, 2025 from 10:00 am to 3:30 pm. The meeting agenda and backup materials are available [here](#).

## **CALIFORNIA AIR RESOURCES BOARD (CARB)**

### Low Carbon Fuel Standard (LCFS) Regulation Update

On February 25, 2025, CARB received a document from the Office of Administrative Law (OAL) detailing requested non-substantive revisions to the text of the LCFS regulation amendments. The LCFS regulation sets a declining carbon intensity target for transportation fuels used in California. On April 4, 2025, CARB issued a [Third Notice of Public Availability of Modified Text and Availability of Additional Documents and/or Information](#) which proposes modifications to the text of the proposed regulation which will be open for public comment until **April 21, 2025**. The current regulation remains in effect as CARB staff work to address the feedback from OAL.

### Meetings and Workshops

On April 17, CARB is hosting a public meeting for the AB 32 Environmental Justice Advisory Committee (EJAC). EJAC was created under AB 32, the California Global Warming

Solutions Act of 2006, to help advise the board in developing the Climate Change Scoping Plan and on pertinent issues related to AB 32. Register [here](#).

On April 18, 2025, in Fortuna, California, CARB will be hosting a One-Stop Truck Event where it will provide overviews of Clean Truck Check, Advanced Clean Fleets, and the Off-Road Regulation, provide one-on-one compliance assistance, and give out free Clean Truck Check testing for on-board diagnostic equipped heavy-duty trucks and motorhomes/RVs. Register [here](#).

On April 30, 2025 at 10:00 am PT, CARB will host a [seminar](#) for a research study measuring light-duty vehicle exhaust emissions using roadside-deployed remote sensing devices at eight California locations. The seminar will also discuss the results of using these measurements and other relevant data to analyze several policy-relevant topics, including long-term vehicle emission trends and emission characteristics disparities for communities of different socioeconomic status.

#### Opportunities for Public Comment

CARB is seeking public comment on its development of a framework for measuring and then reducing the net greenhouse gas emissions from building materials that are used in the state of California pursuant to California Health and Safety Code § 38561.3. CARB is particularly interested in hearing from developers, contractors, construction firms, building material manufacturers, and others in the construction industry. The deadline to [submit comments](#) is **April 17, 2025**.

Pursuant to section 95488.5(d) of the LCFS Regulation, the CARB Executive Officer has certified the 2025 annual update to the carbon intensities (CI) of the following two Lookup Table Pathways:

- California Average Grid Electricity Used as a Transportation Fuel in California
- Electricity Supplied Under the Smart Charging or Smart Electrolysis Provision

These two pathways are posted for a 45-day [public comment period](#) that ends on **May 8, 2025**. The updated pathway CI values are available for quarterly fuel reporting in 2025, beginning with Q1.

#### **MINNESOTA PUBLIC UTILITIES COMMISSION (MPUC)**



At its April 17, 2025, weekly agenda meeting, the MPUC will consider: (1) the compliance filings of CenterPoint Energy Minnesota Gas, Xcel Energy, and Minnesota Energy Resources Corp., relating to pricing impacts following Winter Storm Uri, (2) whether to reconsider a prior order finding an environmental impact statement adequate and consequently issuing a route permit for the Otter Tail to Wilkin Carbon Dioxide Pipeline Project, and (3) whether to investigate a formal complaint lodged against Xcel Energy by SunShare LLC related to alleged violations of a Settlement Agreement requiring Xcel Energy to issue conditional Interconnection Agreements or hold capacity in Xcel Energy's LMI program for certain projects. The agenda is available [here](#).

### **FEDERAL ENERGY REGULATORY COMMISSION (FERC)**

On April 17, 2025, from 10:00 to 11:00 am ET, FERC will hold its April Open Meeting. The agenda is available [here](#).

On April 14, FERC issued a Notice and Agenda for the second public meeting of the Federal and State Current Issues Collaborative in Docket No. AD24-7-000. The meeting will be held on April 30, 2025, from 9:00 am to 1:00 pm ET. The purpose of this meeting is to discuss generic issues related to gas-electric coordination and gas storage. A link to the Webcast will be available on the day of the event: <https://www.ferc.gov/federal-state-current-issues-collaborative>. The agenda is available [here](#).

On April 14, 2025, in [191 FERC ¶ 61,029](#), FERC issued an order accepting ISO New England Inc.'s (ISO-NE) proposed revisions to its Transmission, Markets and Services Tariff (Tariff) to permit ISO-NE to collect and allocate any duties, tariffs, or taxes (Import Duty) that a federal governmental agency directs ISO-NE to pay for Canadian imports of products or services sold under the Tariff into markets administered by ISO-NE, effective March 1, 2025. FERC directed ISO-NE (1) to submit an informational filing that includes any legal and/or technical guidance and related documentation from the relevant federal authorities showing that a federal agency has assessed an Import Duty on Canadian electricity imports on ISO-NE, triggering ISO-NE's collection authority, as soon as practicable after receiving such invoice, and (2) if ISO-NE begins paying Import Duties on Canadian electricity imports, to submit informational filings every six months for three years from the date that payments begin quantifying the costs of the Import Duties in ISO-NE.

Also on April 14, 2025, in [191 FERC ¶ 61,030](#), FERC issued an order accepting New York Independent System Operator, Inc.'s (NYISO) proposed revisions to its Open Access Transmission Tariff and Market Administration and Control Area Services Tariff to govern NYISO's collection and allocation of costs related to the potential imposition of duties on imports of electrical energy from Canada and to allow NYISO to adjust customer credit requirements as needed to address ad valorem rate of duty (Import Duty)-related costs, effective March 1, 2025, subject to condition. FERC directed NYISO to submit a compliance filing to revise sections 2 and 3 of Rate Schedule 22 to include a sentence to provide that NYISO shall calculate payment amounts on Import Duties according to federal regulation or guidance governing the calculation of potential Import Duties on Canadian electricity if it differs from the

formula proposed in those sections, and to remove the alternate cost allocation methodology from Rate Schedule 22. FERC also directed NYISO to make the same informational filings as ISO-NE.

On April 8, 2025, in [191 FERC ¶ 61,020](#), FERC accepted Midcontinent Independent System Operator, Inc.'s (MISO) proposed revisions to its *pro forma* Generator Interconnection Agreement, contained in Appendix 6 to Attachment X (Generator Interconnection Procedures) to its Open Access Transmission, Energy and Operating Reserve Markets Tariff, to adopt certain performance requirements from the Institute of Electrical Electronics Engineers 2800-2022 – Standard for Interconnection and Interoperability of Inverter-Based Resources Interconnecting with Associated Transmission Electric Power Systems, effective April 9, 2025.

On April 4, FERC issued an order, [191 FERC ¶ 61,018](#), partially accepting and directing further compliance on ISO-NE, the New England Power Pool Participants Committee, and the Participating Transmission Owners Administrative Committee on behalf of the New England Participating Transmission Owners' proposed revisions to ISO-NE's Tariff in compliance with the requirements of Order Nos. 2023 and 2023-A.

On April 3, FERC issued a Supplemental Notice & Agenda for the Commissioner-led Technical Conference Regarding the Challenge of Resource Adequacy in Docket No. AD25-7-000. The technical conference will take place from 9:00 am to 4:00 pm ET on Wednesday, June 4, 2025, and Thursday, June 5, 2025. The purpose of this technical conference is to discuss issues related to resource adequacy constructs, including the roles of capacity markets in the Regional Transmission Organization (RTO)/Independent System Operator (ISO) regions that utilize them and alternative constructs in RTO/ISO regions without capacity markets. The conference will start with a panel discussion on resource adequacy challenges across RTO/ISO regions, including regional differences. The remainder of the first day will include three panels specific to PJM Interconnection, L.L.C. (PJM) that will explore PJM's resource adequacy challenge, PJM states' perspectives, and additional perspectives on PJM's path forward. The second day will start with two panels specific to MISO that will explore MISO's resource adequacy challenge and perspectives on MISO's path forward. The remainder of the second day will include one panel to explore the resource adequacy challenge in ISO-NE and NYISO and a final panel on the resource adequacy challenge in CAISO and Southwest Power Pool. The preliminary agenda for this conference is available [here](#).