



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

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Application of Pacific Gas and Electric
Company for Authority, Among Other
Things, to Increase Rates and
Charges for Electric and Gas Service
Effective on January 1, 2027.
(U 39 M)

A.25-05-009

**PROTEST OF THE CALIFORNIA FARM BUREAU FEDERATION
TO THE 2027 GENERAL RATE CASE APPLICATION
OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 M)**

KEVIN JOHNSTON

Attorney for
California Farm Bureau Federation
2600 River Plaza Drive
Sacramento, CA 95833
Telephone: (916) 561-5688
Facsimile: (916) 561-5691
E-mail: kjohnston@cbbf.com

Dated: June 18, 2025

I. INTRODUCTION

Pursuant to Rule 2.6 of the Commission's Rules of Practice and Procedure, the California Farm Bureau Federation¹ (Farm Bureau) submits this Protest to Pacific Gas and Electric Company's (PG&E) Application for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2027 (Application). This Protest is submitted within 30 days of the date the notice of the filing first appeared in the Daily Calendar, May 20, 2025, as required under Rule 2.6. Farm Bureau has consistently participated in PG&E's Phase 2 proceedings and occasionally in Phase 1 including the last Phase 1 (A.21-06-021). The cost implications of PG&E's filing require Farm Bureau to be an active participant in this proceeding, which is requested in conjunction with the submission of this Protest.

The Application has been submitted at a time when affordability continues to be an issue and has seen little reprieve. PG&E's request to increase their revenue requirement by 8% in 2027 and 6.1% for each attrition year 2028-2030 does little to assuage those fears despite PG&E's rosy spin on the increase. There are a number of assumptions and misdirection used in the introduction of this Application in order to minimize what continues to be significant increases which are built upon years of skyrocketing increases in revenue requirement. Since PG&E chose to use the 2017 General Rate Case (GRC) as a benchmark for this

¹ The California Farm Bureau Federation is California's largest farm organization, working to protect family farms and ranches on behalf of its nearly 27,000 members statewide and as part of a nationwide network of more than 5.8 million members. Organized 100 years ago as a voluntary, nongovernmental and nonpartisan organization, it advances its mission throughout the state together with its 54 county Farm Bureaus.

being their “smallest percentage test year increase” since then, it should be noted that the authorized revenue requirement in 2017 was \$8.004 billion.² The adopted revenue requirement in 2026 was \$15.4 billion. A 92% increase in 9 years.

For further context, the percentage revenue requirement increase requested in 2017 was 4.0%.³ This Application is 8%. The 2017 request was a \$319 million increase,⁴ the 2027 request is \$1.24 billion. It is followed by subsequent \$1.014, \$1.075, and \$1.142 billion attrition year increases. While an improvement from the \$3.56 billion increase that was requested in 2023,⁵ it provides little comfort. The 92% increase in revenue requirement since 2017 provides a reminder that because of the increasing base, 8% of 15.4 billion is 92% greater than 8% of 8 billion.

PG&E also looks at the GRC in “isolation” to make a claim that 2027 bills will be flat in comparison to 2025. This ignores numerous other ongoing and likely to be initiated proceedings at the PUC like the cost of capital proceeding or electrification that will undoubtedly increase rates. Customers want transparency, not spin. It similarly obfuscates the billions of dollars that will be requested by PG&E through the SB 884 expedited undergrounding program and in PG&E’s proposed “bridge” process. There is no reason PG&E cannot and should not make their request for miles to be undergrounded for 2027-2030 in this proceeding. The SB 884 program already has a mechanism for handling previously approved

² D.17-05-013, p. 5.

³ *Id.* at 11; Initially, PG&E requested a 5.7% increase but revised that number in rebuttal testimony to 4.0%.

⁴ *Id.*

⁵ A.21-06-021, p. 2.

mileage and PG&E provides no justification as to why a 10-year plan cannot be for 10-years from the end of this GRC period. Stakeholders should not have to engage in a separate advice letter process because PG&E is impatient. Customers deserve to know what costs they are being asked to incur and the GRC is the proper forum for that discussion. Until such time as the SB 884 program is accepting applications, PG&E should be required to present all requested costs for undergrounding in 2027-2030 in this GRC.

II. REASONS FOR PROTEST AND NEED FOR EVIDENTIARY HEARINGS

Farm Bureau is not only concerned with the significant continued increases PG&E is requesting, but also the distortion of what costs will be collected where and the true impacts customers will experience. While the proposed 5.2% bundled electric rate increase for agricultural customers in 2027 is less than nearly 20% from the previous GRC, the cumulative impact of years of massive increases which the 5.2% is building upon provides no comfort.

Farm Bureau anticipates engaging in discovery to identify the potential true costs of PG&E's proposals and anticipates evidentiary hearings will be necessary to draw out these impacts.

III. SCHEDULE

It is anticipated there will be further discussions regarding the preliminary schedule PG&E presented in its Application. Farm Bureau does not suggest specific adjustments to the schedule at this time; however, Farm Bureau anticipates there may be periods within the proceeding that parties who participate extensively at the Commission may see overlap requiring extensions to minimize

impacts on both the parties and the Commission. For instance, testimony for PG&E's latest Phase 2 will not be filed by intervenors until August 25, 2025, and subsequent settlement discussions conflict significantly with the proposed schedule as well as the holidays.

IV. COMMUNICATIONS

All correspondence, pleadings, orders, and notices in this proceeding should be sent to the following for inclusion as party status:

Kevin Johnston
For California Farm Bureau Federation
2600 River Plaza Dr.
Sacramento, CA 95833
Telephone: (916) 561-5688
Fax: (916) 561-5691
E-mail: kjohnston@cbbf.com

In addition, the following person should be included as information only status:

Karen Norene Mills
For California Farm Bureau Federation
2600 River Plaza Dr.
Sacramento, CA 95833
Telephone: (916) 561-5655
Fax: (916) 561-5691
E-mail: kmills@cbbf.com

V. CONCLUSION

Farm Bureau appreciates this opportunity to provide input at the outset of this proceeding in anticipation of identifying proposed costs that should be reduced in order to protect the livelihood of its members and all customers.

Dated: June 18, 2025

Respectfully submitted,

By 
KEVIN JOHNSTON
California Farm Bureau Federation
2600 River Plaza Dr.
Sacramento, CA 95833
Telephone: (916) 561-5688
Fax: (916) 561-5691
E-mail: kjohnston@cbbf.com