



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

**FILED**

08/06/25

04:59 PM

**C2508012**

Rebecca Flores Trustee on Behalf of the Cytah  
Flores Legacy Trust,

Complainant,

vs.

Pacific Gas and Electric Company (U39E),

Defendant.

**Case**

Complaint  
(Rule 4.2)

COMPLAINANT	DEFENDANT
<p>The Cytah Flores Legacy Trust Attn: Rebecca Flores, Trustee 1121 E Santa Fe Ave #4 Merced CA 95340 T: 209-421-9257 E-mail: <a href="mailto:Trustee.CytahFloresTrust@proton.me">Trustee.CytahFloresTrust@proton.me</a></p>	<p>Pacific Gas and Electric Company (U39E) Attn: Steven Frank, Attorney 300 Lakeside Drive Oakland CA 94612 T: 415-973-6976 E-mail 1: <a href="mailto:steven.frank@pge.com">steven.frank@pge.com</a> E-mail 2: <a href="mailto:pgetariffs@pge.com">pgetariffs@pge.com</a></p>

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

(A)

Rebecca Flores Trustee,  
The Cytah Flores Legacy Trust

COMPLAINANT(S)

vs.

(B)

Pacific Gas & Electric Company (PG&E)

DEFENDANT(S)

(Include Utility "U-Number", if known)

(for Commission use only)

(C) the correct response is NO

Have you tried to resolve this matter informally with  
the Commission's Consumer Affairs staff?

☒ YES

☒ NO

Has staff responded to your complaint?

☐ YES

☒ NO

Did you appeal to the Consumer Affairs Manager?

☐ YES

☒ NO

Do you have money on deposit with the  
Commission?

☐ YES

☒ NO

Amount \$ \_\_\_\_\_

Is your service now disconnected?

☐ YES

☒ NO

COMPLAINT

(D)

The complaint of (Provide name, address and phone number for each complainant)

Name of Complainant(s)	Address	Daytime Phone Number
Rebecca Flores, Trustee	1121 E Santa Fe Ave # 4 Merced California 95340]	209-421-9257

respectfully shows that:

(E)

Defendant(s) (Provide name, address and phone number for each defendant)

Name of Defendant(s)	Address	Daytime Phone Number
Pacific Gas & Electric Corporate Secretary	300 Lakeside Drive, Oakland CA 94612	415-973-1000

**(F)**

**Explain fully and clearly the details of your complaint. (Attach additional pages if necessary and any supporting documentation)**

PG&E unlawfully securitized and monetized private trust property, including my utility account, billing contract, financial identifiers, and name, without consent or lawful title to the recovery property. This violated Electric Rule 9.M, Rule 27, and California Civil Code §§ 1798.81–.85.

PG&E issued securitization bonds backed by unlawfully obtained customer contracts while continuing to bill me as if nothing had been paid. The company is double-dipping and profiting from unauthorized securities while harming the trust.

I request a full investigation, restitution, and immediate cessation of all billing activity related to the affected account.

PG&E unlawfully securitized and monetized property of The Cytah Flores Legacy Trust — specifically the utility account, billing contract, trust-held legal name, and associated financial identifiers — without consent, contract, or lawful title. These actions constitute unauthorized use of trust property, breach of privacy, and conversion of assets in violation of:

PG&E Electric Rule 9.M and Rule 27  
 California Civil Code §§ 1798.81–.85 (NPI misuse)  
 California Civil Code §§ 2223, 2224 (constructive trust/wrongful holding)  
 California Probate Code §§ 16000, 16420 (trust enforcement)  
 California Civil Code § 1550 and § 1689 (invalid contracts)  
 The California Consumer Privacy Act (CCPA)  
 Truth in Lending Act (15 U.S.C. § 1601 et seq.)  
 18 U.S.C. § 1343 (wire fraud through unauthorized use of financial accounts)

Complainant seeks full restitution, enforcement of customer protections, a complete accounting of profits gained from monetization of trust property, and a CPUC order to cease all unlawful billing and securitization activity.

**(G) Scoping Memo Information (Rule 4.2(a))**

(1) The proposed category for the Complaint is (check one):

☒ adjudicatory (most complaints are adjudicatory unless they challenge the reasonableness of rates)

☐ ratesetting (check this box if your complaint challenges the reasonableness of a rates)

(2) Are hearings needed, (are there facts in dispute)? ☒ YES ☐ NO

(3) ☒ Regular Complaint ☐ Expedited Complaint

(4) The issues to be considered are (Example: The utility should refund the overbilled amount of \$78.00):

PG&E's unlawful conversion and monetization of trust property, including the billing account, utility account, financial identifiers, and legal name held in trust, for securitization and profit without lawful authority or consent.  
 Whether PG&E violated Rule 9. M, Rule 27, California Civil Code section 1798.81 - .85, and California Probate Code Sections 16000 et seq. by pledging and monetizing trust assets.  
 Whether the commission must order PG&E to cease billing, apply restitution, disgorge all profits gained from securitization of the complainants trust property, and bring PG&E into compliance with all consumer protection and privacy laws.

- (5) The proposed schedule for resolving the complaint within 12 months (if categorized as adjudicatory) or 18 months (if categorized as ratesetting) is as follows:

Prehearing Conference: Approximately 30 to 40 days from the date of filing of the Complaint.

Hearing: Approximately 50 to 70 days from the date of filing of the Complaint.

Prehearing Conference (Example: 6/1/09):	9/15/2025
Hearing (Example: 7/1/09)	10/15/2025

Explain here if you propose a schedule different from the above guidelines.

**(H)**

Wherefore, complainant(s) request(s) an order: State clearly the exact relief desired. (Attach additional pages if necessary)

I request an order requiring PG&E to :

1. Cease billing the Trust for an account that has been monetized.
2. Apply restitution and account setoff from securitization proceeds.
3. Investigate all securitization and billing contracts tied to unauthorized use of information .
4. Enforce Rule 9. M and Rule 27 Privacy protections.
5. Refer the matter to appropriate legal or regulatory bodies.

**(I)**

**OPTIONAL:** I/we would like to receive the answer and other filings of the defendant(s) and information and notices from the Commission by electronic mail (e-mail). My/our e-mail address(es) is/are:

Trustee.CytahFloresTrust@proton.me

**(J)**

Dated Merced , California, this 6th. day of August , 2025  
(City) (date) (month) (year)

Rebecca Flores , Trustee  
Signature of each complainant

**(MUST ALSO SIGN VERIFICATION AND PRIVACY NOTICE)**

**(K)****REPRESENTATIVE'S INFORMATION:**

Provide name, address, telephone number, e-mail address (if consents to notifications by e-mail), and signature of representative, if any.

Name of Representative:	Rebecca Flores, Trustee
Address:	1121 E Santa Fe Ave # 4 Merced California 95340]
Telephone Number:	209-421-9257
E-mail:	Trustee.CytahFloresTrust@Proton.me
Signature	<i>Rebecca Flores</i>

## As Trustee of The Cytah Flores Legacy Trust

## VERIFICATION

(For Individual or Partnerships)

I am (one of) the complainant(s) in the above-entitled matter; the statements in the foregoing document are true of my knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

(L) Executed in fiduciary capacity as Trustee for  
The Cytah Flores Legacy Trust.

Executed on Wednesday August 6, 2025, at Merced, California  
(date) (City)

*Rebecca Flores*

(Complainant Signature) All Rights Reserved, UCC 1-308

## VERIFICATION

(For a Corporation)

I am an officer of the complaining corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

(M)

Executed on \_\_\_\_\_, at \_\_\_\_\_, California  
(date) (City)

Signature of Officer

Title

(N) **NUMBER OF COPIES NEEDED FOR FILING:**

If you are filing your formal complaint on paper, then submit one (1) original, six (6) copies, plus one (1) copy for each named defendant. For example, if your formal complaint has one defendant, then you must submit a total of eight (8) copies (Rule 4.2(b)).

If you are filing your formal complaint electronically (visit <http://www.cpuc.ca.gov/PUC/efiling> for additional details), then you are not required to mail paper copies.

(O) Mail paper copies to: California Public Utilities Commission  
Attn: Docket Office

505 Van Ness Avenue, Room 2001  
San Francisco, CA 94102

## PRIVACYNOTICE

This message is to inform you that the Docket Office of the California Public Utilities Commission ("CPUC") intends to file the above-referenced Formal Complaint electronically instead of in paper form as it was submitted.

Please Note: Whether or not your Formal Complaint is filed in paper form or electronically, Formal Complaints filed with the CPUC become a public record and may be posted on the CPUC's website. Therefore, any information you provide in the Formal Complaint, including, but not limited to, your name, address, city, state, zip code, telephone number, E-mail address and the facts of your case may be available on-line for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced complaint.

*Rebecca Flores*, Trustee

Signature

8/6/2025

Date

Rebecca Flores, Trustee

Print your name

Best Whistleblower Law Firm in

Bill And Payment History

myaccount.pge.com/myaccount/s/bill-and-payment-history

OverviewLoginSSA Plan & Prepare - Socia...TFM Part 2 Chapter 47...EDD Employment Develop...PayPal: SummaryInbox (9,701) - bekafe...USCIS | My Requests

All Activity

Date	Activity	Status	Amount
05/30/2024	Payment	✓ Processed	\$111.00
05/30/2024	Payment	✕ Cancelled	-\$110.67
<div>Confirmation No:2405114216304</div> <div>Payment Type:1099OID*****5800</div> <div>05/11/2024 00:11:025 PDT Scheduled</div> <div>05/17/2024 06:08:040 PDT Cancelled</div>			
05/09/2024	Bill Charges	<a href="#">View Bill PDF</a>	\$110.67
05/01/2024	Payment	✓ Processed	\$89.12
05/01/2024	Payment	⚠ Failed	\$89.12
<div>Confirmation No:2404120238736</div> <div>Payment Type:1099OID*****5800</div> <div>04/12/2024 00:25:013 PDT Scheduled</div>			

7:50 AM

7/1/2025