BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA



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Application of Pacific Gas and Electric Company for Review and Recovery of Costs Associated with the 2019 Kincade Fire and 2021 Dixie Fire under AB 1054

(U 39-M)

MOTION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39-M) TO SHORTEN TIME FOR PROTESTS AND RESPONSES TO A.25-11-001 AND REPLIES

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Pursuant to Rule 11.1 of the Rules of Practice and Procedure of the California Public Utilities Commission (the Commission), Pacific Gas and Electric Company (PG&E) hereby moves to shorten the time for protests and responses to its Application for Review and Recovery of Costs Associated with the 2019 Kincade Fire and 2021 Dixie Fire under AB 1054 (the Application), and the time for replies to any such protests.

Rule 2.6(a) of the Commission's Rules states: "Unless otherwise provided by rule, decision, or General Order, a protest or response must be filed within 30 days of the date the notice of the filing of the application first appears in the Daily Calendar." By this motion, PG&E seeks a ruling requiring protests and responses to be filed on or before December 2, 2025 (18 days from the filing date of the Application), and replies to be filed on or before December 8, 2025 (6 days after the proposed deadline for protests). Absent such a ruling, protests and responses would be due on or around December 17, 2025, and replies would be due on or around December 29, 2025.

Good cause exists for the Commission to shorten the time for protests to the Application and the time for replies to protests. Public Utilities Code Section 1701.8(b) sets forth an expedited schedule for catastrophic wildfire proceedings. Section 1701.8(b)(3) states that "[w]ithin 15 days of the filing date of the application, the commission shall notice a prehearing conference, which shall be held within 25 days of the filing date." Pub. Util. Code § 1701.8(b)(3). Furthermore, Section 1701.8(b)(4) states that "[w]ithin 30 days of the filing date of the application, the assigned commissioner shall prepare and issue, by order or ruling, a scoping memorandum that states that the scope of the proceeding shall be whether the electrical

See also Rule 1.2 (Commission Rules "shall be liberally construed to secure just, speedy, and inexpensive, determination of the issues presented. In special cases and for good cause shown, and within the extent permitted by statute, the Commission may permit deviations from the rules."); Rule 2.6(e) (reply to protests to be filed within 10 days, unless the Administrative Law Judge sets a different time).

corporation's costs and expenses for the covered wildfire are just and reasonable pursuant to Section 451 or 451.1, as applicable." *Id.* § 1701.8(b)(4)(A). This scoping memorandum "shall establish a schedule for the proceeding, including the date of issuance of a proposed decision that is no later than 12 months after the filing date of the application." *Id.* § 1701.8(b)(4)(B).

PG&E's Application was filed and served on November 14, 2025. Accordingly, pursuant to Section 1701.8(b)(3)-(4), a prehearing conference must be held no later than December 9, 2025 (25 days after the filing date), and a scoping memorandum must be issued no later than December 15, 2025 (30 days after the filing date). PG&E's proposed deadlines of December 2 for protests and responses and December 8 for replies would ensure that the Commission can receive and consider any responses, protests, and replies in advance of the prehearing conference and issuance of a scoping memorandum. The proposed deadline of December 2 for protests and responses also strives to accommodate the Thanksgiving holiday. Otherwise, a deadline for protests and responses would fall on or around December 17, and a deadline for replies would fall on or around December 29—well after the date of a prehearing conference, and even after the date by which a scoping memorandum must be issued.

In sum, the statutorily-mandated expedited timeline set forth in Public Utilities Code Section 1701.8(b) presents good cause to shorten time for protests and responses to the application and replies, consistent with the procedural schedule set forth below:

DATE	EVENT
November 14, 2025	Application filed
December 2, 2025	Protests and responses due
December 8, 2025	Applicant's reply to protests due
On or before December 9, 2025	Prehearing Conference
On or before December 15, 2025	Scoping ruling issued
April 3, 2026	Public Advocates Office and intervenor
	testimony due
May 22, 2026	Rebuttal testimony due
July 2026	Evidentiary hearings
August 2026	Opening briefs due
September 2026	Reply briefs due
On or before November 14, 2026	Proposed decision issues
December 2026	Final decision issues

Pursuant to Rule 11.1(g), the Commission has authority to "rul[e] on [this] motion before responses or replies [to the motion] are filed." Because this motion seeks a shortened protest and reply period, issuance of a ruling rapidly would give parties notice of the schedule. PG&E respectfully requests that the Commission grant the motion and set the above deadlines for protests and responses and replies.

Respectfully submitted,

/s/ Joel B. Crance

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