



ALJ/JLQ/asf 11/24/2025

FILED

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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

02:45 PM
A2505009

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)

Application 25-05-009

**E-MAIL RULING DEFERRING RULING ON THE MOTION TO
AMEND THE SCHEDULE**

Dated November 24, 2025, at San Francisco, California.

/s/ JOHN H. LARSEN

John H. Larsen
Administrative Law Judge

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Subject: A.25-05-009 (PG&E 2027 GRC) Email Ruling Deferring Ruling on the Motion to Amend the Schedule

Parties to proceeding A.25-05-009:

PG&E elected not to provide attrition-year undergrounding forecasts in its Test Year 2027 General Rate Case (GRC) application. Instead, PG&E proposed a Bridge Program under which PG&E would: (1) seek to fund one year of undergrounding in this GRC, and (2) potentially seek authorization of up to approximately \$3.6 billion for up to 1,200 miles of electrical undergrounding through a Tier 2 Advice Letter mechanism, contingent on the timing of the Commission's decision on PG&E's Electrical Undergrounding Plan (EUP) under Senate Bill (SB) 884, assuming PG&E submits an EUP.

On November 6, 2025, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) and the Small Business Utility Advocates (SBUA) jointly filed a motion requesting that the California Public Utilities Commission (Commission) amend the proceeding schedule pertaining to the date by which PG&E shall respond to Intervenor's Proposed Alternatives to PG&E's Undergrounding Bridge Program.

In the July 31, 2025 Assigned Commissioner's Scoping Memo and Ruling, the Commission permitted Intervenor to file Proposed Alternatives by September 11, 2025 and required PG&E to file a response to the Proposed Alternatives by September 25, 2025. Cal Advocates, Mussey Grade Road Alliance (MGRA), and The Utility Reform Network (TURN) served alternatives to PG&E's proposed Bridge Program on September 11, 2025. All of them recommended that the Commission direct PG&E to supplement its GRC showing to provide additional information about its post-test year undergrounding plans. However, on September 23, 2025, the Commission granted a PG&E Motion to delay its response to Intervenor's Proposed Alternatives until 5 business days after the Commission votes on draft Resolution SPD-37. This draft resolution was issued subsequent to the issuance of the Scoping Memo. This resolution proposes to align the Guidelines for Expediting the Undergrounding of Distribution Equipment of Large Electrical Corporations (previously adopted in Resolution

SPD-15, issued March 8, 2024) with the recently adopted SB 884 10-Year Electrical Undergrounding Plan Guidelines of the Office of Energy Infrastructure Safety (OEIS).

The moving parties request the amendment due to Pacific Gas and Electric Company's (PG&E) delay in responding to Intervenor's proposed alternatives to PG&E's Undergrounding Bridge Program (the Proposed Alternatives) because Resolution SPD-37 has been repeatedly held from a vote at Commission meetings. Without a decision on Resolution SPD-37, the moving parties contend that Intervenor will not have enough notice or time to adequately review PG&E's response to the Proposed Alternatives. The current schedule requires intervenor testimony to be filed by February 13, 2026. The moving parties contend that these circumstances 1) deny Intervenor's due process rights, 2) provide an unlawfully vague timeline for PG&E to respond to the Proposed Alternatives, 3) constitute an improper delegation to Commission authority to PG&E, and 4) violate Commission Rules of Practice and Procedure (Rules) Rule 7.3.

Cal Advocates argues that it will have insufficient time to fulfill its statutory duty. Further, Cal Advocates argues that any failure to require PG&E to supplement its testimony would likely lead to another delay in the proceeding. Therefore, the moving parties request an adjustment to the proceeding schedule to allow: 1) the efficient development of a complete record, 2) adoption of the GRC before the start of the test year, and 3) to allow intervenors adequate time to review the undergrounding costs requested and the impacts of these costs. Cal Advocates proposes an amendment requiring PG&E to file supplemental testimony including attrition year undergrounding forecasts and corresponding impacts to other cost areas by December 17, 2025, followed by Intervenor's testimony on all programs by April 3, 2026.

In their responses to this motion, the California Community Choice Association (CalCCA), Energy Producers and Users Coalition (EPUC), the Indicated Shippers, and the Utility Reform Network (TURN) support this motion. In its response, TURN notes that PG&E has indicated that it may elect not to file an SB 884 undergrounding plan depending on the program requirements ultimately adopted by the Commission. If PG&E were to decline to file such a plan, the Commission could be left without an adequate record in this GRC to authorize reasonable undergrounding costs and mileage for 2028 - 2030. If that occurs and the Commission declines to require supplemental testimony in this GRC, there

could be no clear venue in which to evaluate PG&E undergrounding plans or related costs for the 2028 – 2030 period.

Coalition for Utility Employees (CUE) and PG&E oppose this motion for several reasons. In its November 14, 2025, PG&E contends the following: 1) the draft Resolution SPD-37 presents major revisions to SPD-15's already-approved guidelines for submission of the EUP and are significant enough that they impact the timing of any potential EUP filing; 2) the current schedule is not "unlawfully vague," 3) requiring supplemental testimony within a few weeks (by December 17) is not feasible; 4) delaying the Track 1 testimony schedule for two months is unnecessary when the existing schedule under the Scoping Memo provides other opportunities to evaluate and decide any bridge funding for undergrounding in this GRC; 5) a two-month delay is not in the customers' interest, and 6) the schedule adopted in the Scoping Memo does not violate intervenors' due process rights because it claims the Scoping Memo will provide multiple opportunities for all parties to offer additional testimony even if adoption of Resolution SPD-37 is delayed further.

Considering all of the above, a complete record regarding attrition-year undergrounding forecasts may be efficiently developed in several ways that are too early to determine.

As a result, the Commission defers ruling on proposals to extend the schedule for supplemental undergrounding testimony until after guidelines for submission of the EUP related to SB 884 (Res SPD-37) are issued or other opportunities to supplement the record are exhausted. Opportunities to supplement the record will remain under consideration as evidence is presented in intervenor testimony, and rebuttal testimony. As in previous GRCs, a separate schedule can be created for a single issue without delaying the rest of the process. Accordingly, a ruling on the motion of Cal Advocates and SBUA is deferred until after the earlier of the issuance of Resolution SPD-37 or the service of rebuttal testimony. The intervenors shall update their motion following the occurrence of the earlier of those events. This motion will also be on the agenda for the prehearing status conference.

It is so ruled.

A.25-05-009 ALJ/JLQ/asf

The docket office shall formally file this ruling.

John H. Larsen

Administrative Law Judge

California Public Utilities Commission

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