

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



FILED

01/07/26

11:31 AM

A2511006

Pacific Gas and Electric Company's
Application for Approval of its 2027 Gas
Cost Allocation and Rate Design Proposals
for its Gas Distribution, Transmission and
Storage System.

Application 25-11-006
(Filed November 21, 2025)

PROTEST OF THE UTILITY REFORM NETWORK



David Cheng, Staff Attorney
The Utility Reform Network
360 Grand Avenue, #150
Oakland, CA 94610
(415) 929-8876
dcheng@turn.org

January 7, 2026

PROTEST OF THE UTILITY REFORM NETWORK

I. Introduction

On November 11, 2025, Pacific Gas and Electric Company (“PG&E”) filed the instant application, seeking approval of its 2027 Gas Cost Allocation and Rate Design Proposals for its Gas Distribution, Transmission, and Storage System. Pursuant to Administrative Law Judge Carolyn Sisto’s E-Mail Ruling Identifying Deadlines for Protests/Responses, and PG&E’s Reply to Protests and Responses, issued on December 9, 2025, The Utility Reform Network (“TURN”) submits this protest to PG&E’s application.

II. Grounds of the Protest and Issues to Be Considered

PG&E’s application identifies 23 issues that should be considered in this proceeding.¹ Based upon its initial review of PG&E’s application, TURN believes that the scope of issues identified by PG&E is reasonable. Many of the identified issues will have an impact on residential ratepayers, including the proposed rates, cost allocation, rate design proposals, and other issues. Thus, TURN intends to actively participate in many of the issues within the scope of this proceeding.

III. Effect of the Application on the Protestant

TURN is a non-profit consumer advocacy organization and has a long history of representing the interests of residential and small commercial customers of California's utility companies before this Commission. TURN's articles of incorporation specifically authorize our representation of the interests of residential customers. As noted above, the instant application

¹ PG&E Application, pp. 18-21.

may adversely affect residential ratepayers in California, whose interests TURN represents, by proposing new rates, cost allocation, rate design proposals, and others.

IV. Proposed Categorization and Need for Hearing

PG&E proposes that this proceeding should be categorized as ratesetting.² TURN concurs that the ratesetting categorization is appropriate. TURN also agrees with PG&E that evidentiary hearings will be necessary.³

V. Schedule

As part of its application, PG&E requests a schedule that would have intervenor testimony be due on May 1, 2026.⁴ This is not a reasonable schedule given that the Commission just issued a Scoping Memo Ruling in a similar proceeding addressing Southern California Gas Company and San Diego Gas & Electric Company's application for authority to revise their natural gas rates and implement storage proposals (A.25-09-014).⁵ In that proceeding, the application was filed on September 30, 2025, and the due date for intervenor testimony is May 15, 2026, or 7.5 months later. Here, PG&E's proposed date of May 1, 2026 for intervenor testimony would result in intervenor testimony being due 5.5 months after the application was filed, two months earlier than A.25-09-014, resulting in an earlier due date for intervenor testimony for this application even though the application was filed nearly two months later. To maintain a more consistent and reasonable schedule, TURN believes that a due date of July 8,

² PG&E Application, p. 17.

³ PG&E Application, p. 18.

⁴ PG&E Application, p. 22.

⁵ Assigned Commissioner's Scoping Memo and Ruling, issued December 23, 2025.

2026 would be appropriate, which would equate to a due date of 7.5 months after the application was filed. Thus, TURN proposes a modified schedule as follows:

	PG&E Proposed Schedule	TURN Proposed Schedule
Intervenor Testimony Served	May 1, 2026	July 8, 2026
Concurrent Rebuttal Testimony Served	July 31, 2026	October 8, 2026
Evidentiary Hearings	September 2026	November 2026
Opening Briefs Filed	October 30, 2026	January 11, 2026
Reply Briefs filed	December 11, 2026	February 22, 2026

Date: January 7, 2026

Respectfully submitted,

By: _____/s/_____
David Cheng
Staff Attorney

The Utility Reform Network
1620 5th Ave, Ste 810
San Diego, CA 92101
Phone: (619) 398-3680 x103
Email: dcheng@turn.org