

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



FILED
01/07/26
04:59 PM
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

**RESPONSE OF THE
NORTHERN CALIFORNIA GENERATION COALITION**

C. Susie Berlin
LAW OFFICES OF SUSIE BERLIN
1346 The Alameda, Suite 7, #141
San Jose, CA 95126
E-mail: berlin@susieberlinlaw.com

Attorneys for the
Northern California Generation Coalition

January 7, 2026

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

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

**RESPONSE OF THE
NORTHERN CALIFORNIA GENERATION COALITION**

Pursuant to the California Public Utilities Commission (Commission) Rules of Practice and Procedure, Rule 2.6, the Northern California Generation Coalition (NCGC)¹ provides this response to PG&E’s *Application for Approval of its 2027 Gas Cost Allocation and Rate Design Proposals for its Gas Distribution, Transmission and Storage System* (Application), dated November 21, 2025. This response is timely filed pursuant to the December 9, 2025, *ALJ Ruling Identifying Deadlines for Protests/Responses, and PG&E’s Reply to Protests/Responses*, ruling that “[p]rotests or responses to A.25-11-006 are due January 7, 2026.”

I. STATEMENT OF INTEREST

NCGC members include publicly owned utilities and a joint powers agency that own and operate gas-fired electric generation in Northern California. NCGC members provide retail electric service directly to residential, business, and industrial customers in their service territories. NCGC members are non-core transmission customers of PG&E, and take service

¹ The members of NCGC are the City of Redding, City of Roseville, City of Santa Clara (doing business as Silicon Valley Power), the Modesto Irrigation District, the Northern California Power Agency (NCPA) on behalf of the Lodi Energy Center Project Participants, and the Turlock Irrigation District.

under PG&E's Gas Schedule G-EG All Other Customers (G-EG/LT). The gas transmission rates that NCGC members pay to PG&E directly impact the cost of providing electricity to their customers. As PG&E non-core, local-transmission customers, NCGC members will be directly impacted by the deliberations and outcome of this proceeding.

II. RESPONSE TO APPLICATION

The G-EG/LT has increased exponentially over the course of PG&E's previous gas transmission and storage (GT&S) applications and cost allocation and rate design (CARD) proceeding. PG&E is once again proposing significant changes that are likely to result in further increased costs for NCGC members. This response is based on NCGC's preliminary review of the Application and supporting testimony. Once additional workpapers are available and NCGC has had an opportunity to further review and analyze the testimony and related work papers, as well as responses to potential data requests, NCGC may need to address additional issues.

Allocation Methodology: The Application proposes an increase for electric generation from 0.1% of the total revenue requirement to 1.63%. NCGC plans to pursue additional information and data regarding the allocation methodology change from Marginal Cost methodology to Embedded Cost methodology.²

Electric Generation Forecasts: NCGC is concerned that the rate forecasts for market responsive electric generation may not accurately capture the anticipated load changes likely to occur during the upcoming rate period, including impacts from data centers, increased electrification mandates, and expansion of the Extended Day Ahead Market.

² Exhibit PG&E-2; Forecast & Cost of Service Studies.

Local Transmission Study: PG&E is proposing to modify the local transmission allocation between core and noncore customers.³ More information is needed in order to determine whether this proposal is just and reasonable.

EG Rate Design: The Application proposes implementation of a fixed fee on residential customers, in part to address the fact that a significant portion of the revenue requirement comes from fixed costs. However, no such option is proposed for EG customers. NCGC opposes PG&E's proposal to retain the 100% volumetric rate design with optionality of negotiating fixed rate contracts with market responsive EG customers.

Other Matters: Continued review and analysis of the Application, PG&E workpapers, as well as a review future data requests and responses, may give rise to additional issues that should be further addressed by the Commission during the scoping phase of this proceeding.

III. CATEGORIZATION, HEARINGS, AND SCHEDULE

NCGC does not object to the categorization of this proceeding as ratesetting and agrees that hearings will likely be necessary. NCGC does not object to the schedule proposed in the Application. NCGC does not object to the scope of issues presented in the Application, but reserves the right to raise additional reserves the right to raise additional issues pending further review and analysis of the Application, supporting testimony, and potential data responses.

IV. REQUEST FOR PARTY STATUS

Pursuant to Rule 1.4 of the Commission's Rules, NCGC requests active party status in this proceeding. As customers of PG&E, NCGC has a direct interest in the issues presented in the Application, and intends to participate in this proceeding to seek resolution of the issues addressed herein, as well as those that are raised during the discovery process.

³ Exhibit PG&E-3, Chapter 1

V. SERVICE LIST

NCGC requests that following be added to the official service list for this proceeding:

C. Susie Berlin
1346 The Alameda, Suite 7, #141
San Jose, CA 95126
berlin@susieberlinlaw.com

VI. CONCLUSION

NCGC appreciates the opportunity to respond to the Application and looks forward to working with PG&E and interested stakeholders on resolution of the issues presented. NCGC requests that the Commission not preclude NCGC or other parties from addressing additional issues that are raised as the full scope of the Application, supporting testimony, and discovery are reviewed.

January 7, 2026

Respectfully submitted,



C. Susie Berlin

LAW OFFICES OF SUSIE BERLIN

C. Susie Berlin

1346 The Alameda, Suite 7, #141

San Jose, CA 95126

E-mail: berlin@susieberlinlaw.com

for the **Northern California Generation Coalition**