



BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED

01/05/26

04:59 PM

C2601013

Grace Victoria Starr,

Complainant,

vs.

Pacific Gas and Electric Company (U39E),

Defendant.

Case

Complaint
(Rule 4.2)

COMPLAINANT	DEFENDANT
Grace Victoria Starr 4999 Berkeland Court San Jose CA 95111 T: 408-757-2299 E-mail: v21angel@yahoo.com	Pacific Gas and Electric Company (U39E) Attn: Cliff Gleicher, Managing Counsel 300 Lakeside Drive Oakland CA 94612 T1: 415-971-2678 E-mail 1: Cliff.Gleicher@pge.com E-mail 2: pgetariffs@pge.com

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

(A) Grace Victoria Starr

COMPLAINANT(S)

vs.

(B) PG & E

DEFENDANT(S)

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

(for Commission use only)

(C)

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

YES NO

Did you appeal to the Consumer Affairs Manager?

YES NO

Has staff responded to your complaint?

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
Grace Victoria Starr	4999 Berkeland Court, San Jose Ca. 95111	408 757 2299

respectfully shows that:

(E)

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

Name of Defendant(s)	Address	Daytime Phone Number
PG&E	300 Lakeside Drive, Oakland, CA 94612	877 660-6789

(F)

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

FORMAL COMPLAINT.

For Violation of CPUC General Orders 95 and 128 and Public Utilities Code § 451, 701 and 1702.

PG&E installed multiple utility manholes in Complainant's neighborhood. One manhole is located near Complainant's mailbox and is not in dispute. A second manhole was installed entirely within Complainant's front lawn on private property, rather than within the public sidewalk or roadway.

No other property in the neighborhood has a utility manhole installed in the front lawn. Under substantially similar conditions, neighboring single-family residences have two PG&E manholes located within the public sidewalk or roadway.

PG&E asserted in writing that City restrictions prohibited sidewalk or roadway placement and required installation on Complainant's private property. PG&E has provided no municipal code, permit condition, or written City determination supporting this claim and has refused to relocate the manhole.

See attached Complaint and Exhibits for full factual allegations, legal claims, and photographic evidence.

(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 rates pursuant to Rule 4.1(b))

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

(3) Regular Complaint Expedited Complaint (Rule 4.6)

(4) The issues to be considered are

(Example: The utility should refund the overbilled amount of \$78.00):

The issues to be considered are whether PG&E violated CPUC General Orders 95 and 128 and Public Utilities Code § 451 by placing a utility manhole on Complainant's private property without justification.

The Commission must also decide whether PG&E should be required to relocate the manhole, restore Complainant's property, and apply siting standards consistently and non-discriminatorily.

(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): I agree to the default
 Hearing (Example: 7/1/09): adjudicatory schedule.

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)

- A. Find that PG&E violated CPUC General Orders 95 and 128 and Public Utilities Code § 451;
- B. Order PG&E to relocate the disputed manhole from Complainant's private property to the public right-of-way;
- C. Require PG&E to restore Complainant's property to its prior condition;
- D. Direct PG&E to apply siting and construction standards uniformly and non-discriminatorily; and
- E. Grant such other and further relief as the Commission deems just and proper.

(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:

v21angel@yahoo.com

(J)

Dated San Jose, California, this 2 day of January, 2026
 (City) (date) (month) (year)

George Antonio Strome
 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: Grace Victoria Starr

Address: 4999 Berkeland Ct San Jose CA 95111 United States

Telephone Number: (408) 757-2299

E-mail: v21angel@yahoo.com

Signature: Grace Victoria Starr

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 on 1/2/2026, at San Jose, California
(date) (City)

Grace Gutierrez-Samu
(Complainant Signature)

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 (1) defendant, then you must submit a total of eight (8) copies.

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

PRIVACY NOTICE

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 online for later public viewing.

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

Grace Victoria Starr

Signature

January 2, 2020

Date

Grace Victoria Starr

Print your name

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

In the Matter of the Complaint of

Grace Victoria Starr

4999 Berkeland Court

San Jose, California 95124

Daytime Phone: 408-757-2299

v.

Pacific Gas and Electric Company (PG&E)

FORMAL COMPLAINT

For Violation of CPUC General Orders 95 and 128

and Public Utilities Code § 451

I. PARTIES

1. Complainant is Grace Victoria Starr, the owner and occupant of a single-family residential property located at 4999 Berkeland Court, San Jose, California.
2. Respondent Pacific Gas and Electric Company (“PG&E”) is a public utility regulated by the CPUC.

II. JURISDICTION

3. This Commission has jurisdiction over this Complaint pursuant to Article XII of the California Constitution and California Public Utilities Code §§ 451, 701, and 1702.

III. FACTUAL ALLEGATIONS

PG&E installed electrical infrastructure in Complainant’s neighborhood that included more than one utility manhole.

One manhole is located near Complainant’s mailbox and is not in dispute. A second manhole was installed entirely within Complainant’s front lawn, on private property, rather than within the public sidewalk or roadway.

No other property in the neighborhood has a utility manhole installed within the front lawn. Under substantially similar conditions, neighboring single-family residences have two PG&E manholes installed within the public sidewalk or roadway.

PG&E stated in writing that the City prohibits installation of a second manhole within the public sidewalk or roadway for a single-family residential property and that this restriction required placement of the manhole on Complainant's private property (Exhibit C).

This statement is incorrect.

PG&E has failed to provide any municipal code provision, permit condition, engineering standard, or written City determination supporting its claim that placement within the public sidewalk or roadway was prohibited or that private-property placement was required.

Despite repeated requests, PG&E has refused to relocate the manhole from Complainant's private lawn to the public right-of-way.

IV. VIOLATIONS OF LAW AND CPUC ORDERS

Count I – Violation of CPUC General Order 95

PG&E failed to locate and maintain its facilities in a reasonable manner that minimizes unnecessary intrusion on private property, in violation of General Order 95, including Rules 12 and 31.

Count II – Violation of CPUC General Order 128

PG&E violated General Order 128, Section III, which requires utilities to:

Use the public right-of-way when feasible;

Avoid unnecessary occupation of private property; and

Apply siting and construction practices uniformly and without discrimination.

PG&E's placement of a utility manhole on Complainant's private lawn, while permitting sidewalk or roadway placement for similarly situated neighboring properties, constitutes non-uniform and discriminatory application of siting standards.

Count III – Violation of Public Utilities Code § 451

PG&E failed to provide facilities and service that are just, reasonable, and non-discriminatory, in violation of Public Utilities Code § 451, by imposing a private-property burden on Complainant that is not imposed on similarly situated customers.

V. LOCAL AUTHORITY AND RIGHT-OF-WAY ISSUES

PG&E improperly relied on an unsupported assertion regarding City restrictions to justify placement of a utility manhole on Complainant's private property.

PG&E has produced no written City determination, permit condition, or municipal code citation requiring deviation from standard placement within the public right-of-way.

PG&E's conduct raises concerns regarding improper reliance on local authority and unnecessary occupation of private property.

VI. PRAYER FOR RELIEF

WHEREFORE, Complainant respectfully requests that the Commission:

- A. Find that PG&E violated CPUC General Orders 95 and 128 and Public Utilities Code § 451;
- B. Order PG&E to relocate the disputed manhole from Complainant's private property to the public right-of-way;
- C. Require PG&E to restore Complainant's property to its prior condition;
- D. Direct PG&E to apply siting and construction standards uniformly and non-discriminatorily; and
- E. Grant such other and further relief as the Commission deems just and proper

VII. EXHIBITS

Exhibit A-(a)

Photo of neighboring sidewalk manholes. Across from complainant's home.



Exhibit -A (b)

Photo of neighboring sidewalk manholes, within complainant's neighborhood.



Exhibit B-(a)

New manholes installed in roadway near complainant's home.



Exhibit B-(b)

New manholes installed in neighborhood, this one on the sidewalk, on Fullerton Road, which is a cross street for Berkeland Court





December 11, 2025

Grace Starr
4999 Berkeland Court
San Jose, CA 95111

Re: PG&E Claim No.: 2025552040
Date of Incident: 10/03/2025

Dear Grace Starr:

Thank you for your patience while we investigated your claim.

We acknowledge receipt of your claim concerning the recent PG&E work at your residence. The secondary box was installed according to the design specifications within the 10-foot Public Utility Easement at 4999 Berkeland Ct. Please note that the City of San Jose does not permit the installation of secondary boxes within the sidewalk area.

MGE served as the contractor responsible for installing the secondary box and removing landscaping. MGE will manage the restoration of softscape elements, while hardscape repairs (such as sidewalk restoration) will be addressed by our dedicated restoration team once scheduling is confirmed.

Given the above circumstances, PG&E is unable to relocate the secondary box, as it was properly placed within the public utility easement and local regulations prohibit its installation within the sidewalk.

If you have any questions or additional information that you wish us to consider, please contact me at Daniella.Velasquez@pge.com. Please always refer to your claim number in any communication.

Sincerely,

Daniella Velasquez
Daniella Velasquez
Claims Investigator
(925) 786-7589
6121 Bollinger Canyon Road
San Ramon, CA 94583

Public

Exhibit D-

Photos of manhole on complainant's lawn, with yardstick

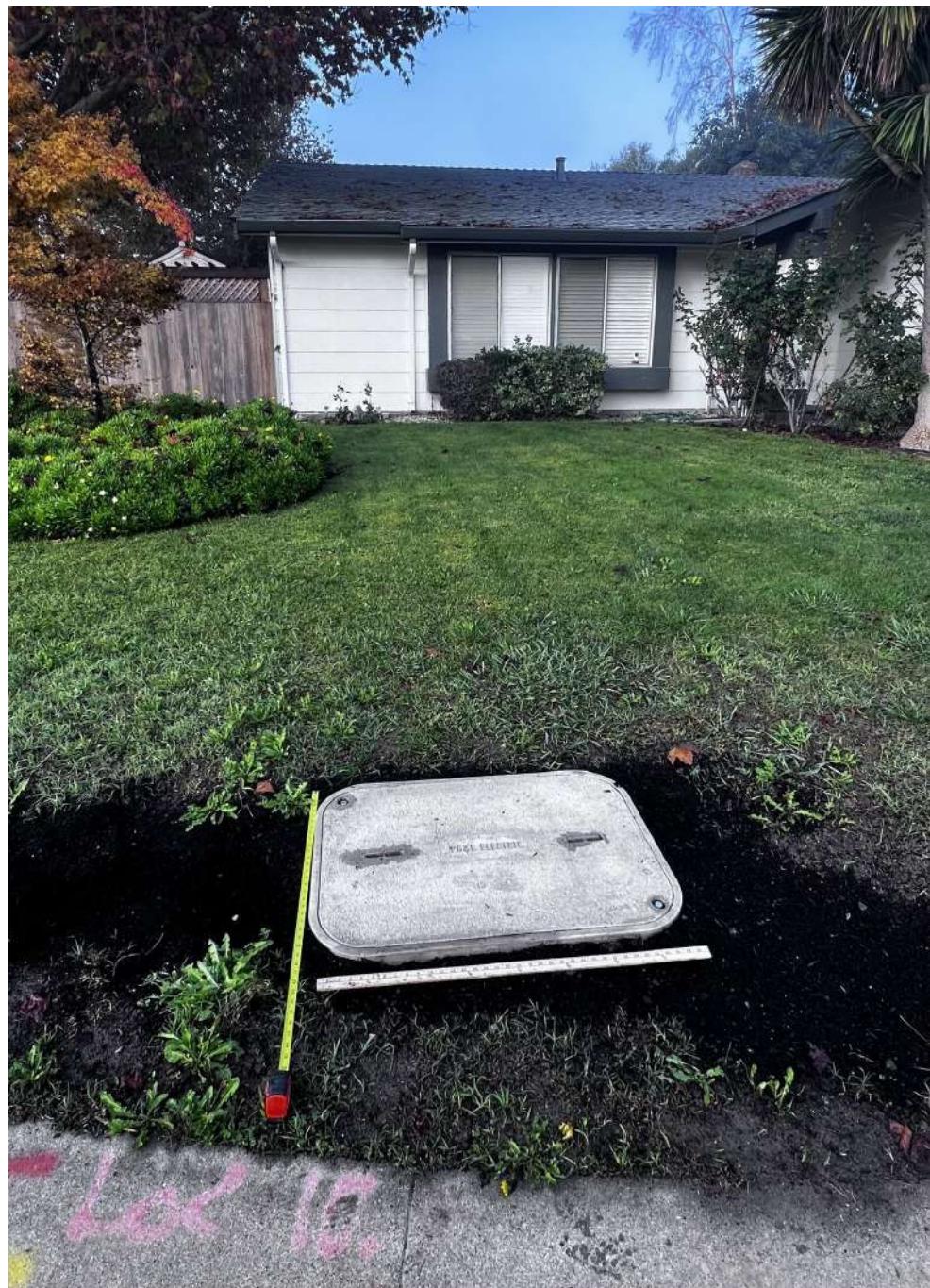


Exhibit E –

Photos of original ground markings indicating initial utility routing and showing changed/deviation placement to complainant's lawn.



VIII. VERIFICATION

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

Executed on December 26, 2025

At San Jose, California

Grace Victoria Starr

Grace Victoria Starr

Complainant