



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

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Joint Application of the Public Advocates  
Office, The Utility Reform Network and  
Mussey Grade Road Alliance for  
Rehearing of Resolution SPD-37.

Application No. A.26-01-006  
(Filed January 9, 2026)

**JOINT RESPONSE OF PACIFIC GAS AND ELECTRIC  
COMPANY (U 39-E), SAN DIEGO GAS & ELECTRIC  
COMPANY (U 902-E), SOUTHERN CALIFORNIA EDISON  
COMPANY (U 338-E) TO THE JOINT APPLICATION OF  
THE PUBLIC ADVOCATES OFFICE, THE UTILITY  
REFORM NETWORK, AND MUSSEY GRADE ROAD  
ALLIANCE FOR REHEARING OF RESOLUTION SPD-37**

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**I. INTRODUCTION**

Pursuant to Rule 16.1 (d) of the California Public Utilities Commission’s Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) (collectively the Utilities) submit this joint response to the Application for Rehearing (AFR) of Resolution SPD-37 that was filed jointly by the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), The Utility Reform Network (TURN), and Mussey Grade Road Alliance (MGRA) (collectively the Parties).

The AFR should be denied because it fails to demonstrate legal error. The Parties specifically challenge the SPD-37 requirement that the Utilities file a Phase 1 Joint Application requesting approval of (1) a Benefit-Cost Ratio (BCR) calculation, (2) an audit methodology, and (3) other cost recovery conditions to be used in future 10-year distribution infrastructure electrical undergrounding plans (EUPs) under Senate Bill (SB) 884 in 60 days, with counter proposals due 15 days later.<sup>1</sup> While the Utilities recognize that 15 days is an abbreviated timeline, the California Public Utilities Commission (CPUC or Commission) has the express

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<sup>1</sup> AFR, pp. 2-3.

authority and broad discretion to address an application on an expedited schedule. That the Commission has chosen to apply that authority does not, by itself, constitute reversible legal error warranting rehearing.<sup>2</sup> The three specific Rules cited in the AFR do not negate that fact; instead, they underscore the Commission's authority to establish expedited procedures.

In addition, SPD-37 does not deny due process to the Parties. Once the Utilities file the Phase 1 Joint Application, a Commissioner will be assigned to oversee the new case, and an Administrative Law Judge will likely be assigned to conduct the proceeding.<sup>3</sup> They will prepare and issue, by order or ruling, a scoping memo that describes the issues to be considered and the applicable timetable for resolution consistent with due process.<sup>4</sup> Further, the Parties have already been significantly involved in the process of developing EUP Guidelines with the Office of Energy Infrastructure Safety (Energy Safety) and the CPUC and discussing the topics contemplated in the Phase 1 Joint Application. Once the Phase 1 Joint Application is determined, the Parties will once again be able to comment and have an opportunity for discovery on any future EUP. Accordingly, the Parties have had, and will have, multiple, meaningful opportunities to be heard on the topics addressed in this new proceeding.

For the reasons stated above, as well as to avoid further delay in implementing SB 884, the Utilities respectfully request that the AFR be denied.

## **II. FACTUAL BACKGROUND AND PROCEDURAL HISTORY**

SB 884, which became effective January 1, 2023, requires the CPUC to establish an *expedited* distribution infrastructure undergrounding program to address wildfire and reliability risk.<sup>5</sup> A large electrical corporation participating in the program must submit a 10-year electrical undergrounding plan that substantially increases electric reliability and reduces wildfire risk to

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<sup>2</sup> See generally AFR, p. 5.

<sup>3</sup> See Pub. Util. Code § 1701.1(c).

<sup>4</sup> See Pub, Util. Code § 1701.1(c).

<sup>5</sup> Resolution (Res.) SPD-37, p. 3.

Energy Safety for review.<sup>6</sup> Energy Safety has nine months to review and approve or deny the plan.<sup>7</sup> If approved, the large electrical corporation has 60 days to submit a copy of the plan to the CPUC along with an application requesting review and conditional approval of the plan's costs.<sup>8</sup> The CPUC has nine months to approve or deny the application.<sup>9</sup>

For over three years, the CPUC and Energy Safety have been engaging with the Utilities and other stakeholders, including the Parties, to prepare guidelines that will facilitate the submission of 10-year EUPs pursuant to SB 884.<sup>10,11</sup> Below, we recount the actions taken by the CPUC and Energy Safety to develop EUP Guidelines, as well as the significant involvement of the Utilities and the Parties in that process. We then describe SPD-37 and the portion of that Resolution to which the Parties object in the AFR.

#### **A. CPUC Cost Recovery Application Guidelines – SPD-15**

The Commission's Safety Policy Division (SPD) held a joint public workshop on February 24, 2023 to discuss SB 884 requirements and invited parties to comment on a series of questions.<sup>12</sup> Topics addressed during the workshop included undergrounding cost efficiency, alternative mitigations, hiring an independent monitor to evaluate utility progress, and cost accountability tools.<sup>13</sup> Personnel for PG&E and the Parties presented at the workshop and submitted post-workshop comments in early March 2023.<sup>14</sup>

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<sup>6</sup> See Pub. Util. Code § 8388.5(d), emphasis added.

<sup>7</sup> See Pub. Util. Code § 8388.5(d).

<sup>8</sup> See Pub. Util. Code § 8388.5(e).

<sup>9</sup> See Pub. Util. Code § 8388.5(e).

<sup>10</sup> 10-year undergrounding plans will provide participating utilities with greater regulatory support and cost recovery assurance for future undergrounding work that will improve customer and community safety and reliability.

<sup>11</sup> On November 17, 2022, the CPUC and Energy Safety released a joint letter indicating that large electrical corporations should not submit a 10-year EUP until after the guidelines are finalized.

<sup>12</sup> Draft Res. SPD-15, p. 4.

<sup>13</sup> SB 884 Joint Workshop Slides, Slides 12, and 28-29.

<sup>14</sup> SB 884 Joint Workshop Slides, Slides 12, and 28-29.

On September 13, 2023, SPD issued its initial *Staff Proposal for the SB 884 Program* and solicited feedback on the program’s guidelines. It introduced a two-phased approach for large electrical corporations for EUP cost recovery approval. In Phase 1, the CPUC would review the submitted application to determine whether the forecasted costs should be conditionally approved.<sup>15</sup> The application would require a discussion of various cost recovery conditions including cost-benefit ratios for undergrounding projects, alternative mitigations, and third-party monitoring of plan compliance.<sup>16</sup> In Phase 2, large electrical corporations would then file an advice letter seeking recovery of recorded costs.<sup>17</sup> On September 27, 2023, various stakeholders including PG&E and the Parties provided written comments on the proposed guidelines.<sup>18</sup>

After obtaining this feedback, on November 10, 2023, SPD issued Draft Resolution SPD-15, which updated and adopted the Commission’s Staff Proposal for the SB 884 Program. SPD-15 introduced a third phase into the EUP process, which included plan implementation, progress reporting, and cost booking to a one-way balancing account.<sup>19</sup> SPD-15 also set forth program-level requirements for the cost recovery application to be completed in Phase 2.<sup>20</sup> PG&E and the Parties submitted opening and reply comments on SPD-15.

On March 7, 2024, the CPUC approved SPD-15. The final version of SPD-15 included the three phases described in the initial draft and introduced additional requirements such as an audit to ensure undergrounding projects meet the Phase 2 cost recovery application requirements.<sup>21</sup> The CPUC also stated that following Energy Safety’s future issuance of EUP

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<sup>15</sup> Staff Proposal for SB 884 Program, p. 5.

<sup>16</sup> Staff Proposal for SB 884 Program, pp. 5-8.

<sup>17</sup> Staff Proposal for SB 884 Program, p. 9.

<sup>18</sup> The Public Advocates Office at the California Public Utilities Commission (Cal Advocates); California Farm Bureau (CFB); Coalition of California Utility Employees (CUE); ExteNet Systems LLC and ExteNet Systems (California) (Extenet); Mussey Grade Road Alliance (MGRA); and The Utility Reform Network (TURN).

<sup>19</sup> Draft Res. SPD-15, p. 2.

<sup>20</sup> Draft Res. SPD-15, p. 9.

<sup>21</sup> Res. SPD-15, p. 2.

guidelines, it would align the preliminary CPUC SB 884 Project List Data Requirements and GIS data requirements with the Energy Safety guidelines, adding any data elements necessary for Commission conditional approval purposes.<sup>22</sup>

## **B. Energy Safety EUP Guidelines**

Between November 7 and December 12, 2023, Energy Safety held five working group sessions to discuss the development of EUP guidelines.<sup>23</sup> Interested parties were invited to submit comments in January 2024 on various questions about program implementation before the working group sessions where additional discussion would take place. Question topics included alternative mitigations, prioritization methodology, interagency coordination, compliance, and independent monitoring.<sup>24</sup> PG&E, as well as the Parties, participated in these working groups and submitted related sets of written comments.

On May 8, 2024, Energy Safety issued draft EUP guidelines and invited interested stakeholders to participate in public workshops and comment.<sup>25</sup> In the guidelines, Energy Safety indicated that it would approve an EUP that substantially increased reliability by reducing the use of public safety power shutoffs, enhanced powerline safety settings, and de-energization events and substantially reduced the risk of wildfire.<sup>26</sup> To support this, the EUP required portfolio mitigation objectives and other targets. PG&E and the Parties participated in workshops and provided substantive opening and reply comments on the draft guidelines.

Energy Safety issued revised EUP Guidelines on September 10, 2023<sup>27</sup>, and an updated

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<sup>22</sup> Res. SPD-15, p. 21.

<sup>23</sup> Letter from Kristin Ralff Douglass (Office of Energy Infrastructure Safety) to EUP Stakeholders (October 27, 2023).

<sup>24</sup> Electrical Undergrounding Plans Guidelines Development Working Groups: Alternative Mitigations and Prioritization Methodology: Working Group #2 (November 14, 2023); Interagency Coordination - Working Group #3 (November 21, 2023); and Independent Monitor and Compliance – Working Group #4 (November 28, 2023)

<sup>25</sup> Draft 10-Year Electrical Undergrounding Plan Guidelines, (May 8, 2024).

<sup>26</sup> Draft 10-Year Electrical Undergrounding Plan Guidelines, p. 3.

<sup>27</sup> Revisions to Draft 10-Year Electrical Undergrounding Plan Guidelines, (September 10, 2024).

version on September 13, 2024.<sup>28</sup> PG&E and the Parties provided opening and reply comments. On January 6, 2025, Energy Safety issued a second set of revised EUP guidelines and held a public workshop on January 17, 2025, to discuss the updates.<sup>29</sup> PG&E and Cal Advocates provided opening and reply comments regarding the second revised EUP guidelines. And on February 20, 2025, Energy Safety issued final EUP guidelines that remain in effect as of this response.<sup>30</sup>

### **C. Revised CPUC EUP Guidelines – SPD-37**

On August 15, 2025, SPD issued draft Resolution SPD-37, which updated the SPD-15 EUP guidelines after hosting three Technical Working Groups (TWGs) and receiving informal comments following the TWGs in June 2025.<sup>31</sup> SPD-37 updated the Phase 2 application requirements, added Phase 2 conditions aimed at ensuring projects were cost effective, introduced an untested benefit-cost ratio calculation for proposed projects, explained a process for ensuring memorandum account costs were capped, and adopted new audit requirements.<sup>32</sup> PG&E and the Parties submitted written opening and reply comments that resulted in significant updates to the draft resolution.

On December 4, 2025, the CPUC approved an updated version of SPD-37 that removed many of the new requirements introduced in the original draft SPD-37. The final SPD-37 instead required that the Joint Utilities—PG&E, SDG&E, and SCE—submit a Phase 1 application to address three issues not resolved in the resolution including: (1) how cost-benefit ratios should be calculated; (2) the proposed audit methodology; and (3) other cost recovery conditions to ensure balancing account costs are just and reasonable.<sup>33</sup> The Utilities have until February 9,

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<sup>28</sup> Updated Revised Draft 10-Year Electrical Undergrounding Plan Guidelines, (September 13, 2024).

<sup>29</sup> Second Revised Draft 10-Year Electrical Undergrounding Plan Guidelines, (January 6, 2025).

<sup>30</sup> 10-Year Electrical Undergrounding Plan Guidelines (February 20, 2025).

<sup>31</sup> In Res. SPD-37, the CPUC acknowledged that Res. SPD-15 noted that additional issues remained to be resolved. Res. SPD-37, p. 2.

<sup>32</sup> *See generally* Res. SPD-37.

<sup>33</sup> Res. SPD-37, p. 25.

2026 to submit the Phase 1 Joint Application, and parties to the application may respond within 15 calendar days.<sup>34</sup> It is to this portion of SPD-37—the 15-day response timeline—that the Parties to the AFR object.<sup>35</sup>

### **III. THE APPLICATION FAILS TO DEMONSTRATE LEGAL ERROR IN RESOLUTION SPD-37**

An AFR must demonstrate legal error, setting forth specifically the ground or grounds for why the decision is unlawful.<sup>36</sup> An AFR is not “a vehicle for relitigation of policy positions or to reweigh evidence.”<sup>37</sup> In addition, the Commission not weighing evidence in an applicant’s favor does not constitute legal error.<sup>38</sup>

Here, the AFR does not demonstrate legal error because the CPUC has discretion to set an expedited schedule to resolve an application. Additionally, SPD-37 does not infringe on the Parties’ due process rights. The Parties have spent years providing input into the EUP guidelines drafted by Energy Safety and the CPUC, and they will have the opportunity to participate in the upcoming proceeding in response to the Phase 1 Joint Application. The Parties will also have 18 months to comment on any future EUP that is filed by a large electrical corporation through the Energy Safety and CPUC review processes, providing an ample amount of process.

#### **A. The CPUC Has Authority to Set an Expedited Schedule**

SPD-37’s requirement directing parties to respond to the Phase 1 Joint Application within 15 days is not legal error because the CPUC has the authority to set an expedited schedule. The Commission is a constitutionally established, independent regulatory agency that has the power to establish its own procedures and receives broad deference in doing so.<sup>39</sup> Rule 1.2 of the

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<sup>34</sup> Res. SPD-37, Attachment A, p. 7.

<sup>35</sup> AFR, p. 2.

<sup>36</sup> Pub. Util. Code § 1732; Rule 16.1(c).

<sup>37</sup> D.21-08-022 p. 2 (citation omitted); D.18-06-036 pp. 11-12, fn.27 (“[T]he purpose of a rehearing application is to specify legal error, not to relitigate issues.”).

<sup>38</sup> D.21-08-022, p. 3.

<sup>39</sup> *City and County of San Francisco v. CPUC* (2025) 108 Cal.App.5<sup>th</sup> 22, 57; Cal. Const., art. XII, § 2.

CPUC’s Rules of Practice and Procedure (“Rules”) states that “[t]hese 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.*”<sup>40</sup> Moreover, “[t]he Commission’s interpretation of its own rules and regulations is entitled to consideration and respect,” and courts generally do not interfere with the Commission’s choice of procedures absent a manifest abuse of discretion or unreasonable interpretation.<sup>41</sup>

Other procedural rules further support the CPUC establishing an expedited schedule that deviates from general practice. Rule 2.6(a) explains that while 30 days is the general protest period for an application, this timeframe may be altered if “otherwise provided by rule, decision, or General Order.”<sup>42</sup> Rule 2.9(c) also explains that applicants may request an expedited schedule and that “the assigned Commissioner has the discretion to grant a request for an expedited schedule if the attachment demonstrates specific facts, that constitute either: a threat to public safety or the need to resolve a financial matter expeditiously to avoid ratepayer harm.”<sup>43</sup> The fact that, in this instance, the CPUC chose to expedite the Phase 1 Joint Application, *sua sponte*, rather than waiting for a direct request from an applicant, does not nullify its authority.

SPD-37 rightfully includes an abbreviated response time to the Phase 1 Joint Application because it has taken three years to develop EUP guidelines despite SB 884’s directive to establish an *expedited* distribution infrastructure undergrounding program to address wildfire and reliability risk, which are ongoing threats to public safety. Thus, this is an instance where good cause supports a deviation from the general response deadline under Rule 1.2, preventing additional procedural delays in implementing SB 884.

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<sup>40</sup> Rule 1.2, emphasis added.

<sup>41</sup> *The Utility Reform Network v. Public Utilities Com.* (2014) 223 Cal.App.4th 945, 958; *see City and County of San Francisco v. CPUC* (2025) 108 Cal.App.5th 22, 57 (“Petitioners face an uphill battle in contradicting the Commission’s choice of procedure appropriate for a particular ruling or decision.”).

<sup>42</sup> Rule, 2.6(a).

<sup>43</sup> Rule 2.9 (c).

**B. The Commission Has Discretion in Establishing a Schedule Under the Rules Cited by the Parties**

The Rules cited by the Parties do not limit the Commission’s discretion to establish an expedited schedule. The Intervenors are incorrect that Rule 2.6(a) mandates a 30-day protest period. Instead, as noted above, Rule 2.6(a) provides that the Commission, through a “rule, decision, or General Order,” may alter that protest window.

Here, the CPUC’s vote approving SPD-37 is a decision establishing a shorter response time than 30 days, which is permitted under Rule 2.6(a). Moreover, SPD-37 is not invalid simply because the CPUC did not reiterate the specific requirements to become a party to a proceeding.<sup>44</sup> The Resolution requires the Utilities to file the Phase 1 Joint Application within 60 days and that “[p]arties to the Phase 1 Application may ... make counter proposals within 15 calendar days.”<sup>45</sup> While it is true that SPD-37 does not describe precisely how an interested stakeholder will gain party status, the Parties submitting the AFR are sophisticated and have significant experience with the CPUC’s Rules of Practice of Procedure.

In fact, the Parties cite to Rule 1.4(a) which states that a person may become a party to a proceeding by filing “a protest or response to an application” or “filing a motion to become a party.”<sup>46</sup> As such, absent other specific instructions from the Commission, the Parties may, if they believe it is necessary, follow Rule 1.4(a) to gain party status after the Phase 1 Joint Application is filed. The Utilities have no intention of opposing the Parties’ request or motion for party status. Arguing that legal error exists because SPD-37 does not delineate each procedural step of a forthcoming proceeding that will be overseen by a Commissioner and/or Administrative Law Judge improperly elevates form over substance, when the Rules explicitly provide avenues for party status without explicit instructions.<sup>47</sup>

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<sup>44</sup> AFR, p. 6.

<sup>45</sup> Res. SPD-37, Attachment, p. 7.

<sup>46</sup> Rule 1.4 (a) 1, 4.

<sup>47</sup> See generally language disapproving form over substance in *20th Century Ins. Co. v. Garamendi* (1994) 8 Cal.4th 216, 286–287, *Mahon v. City of San Diego* (2020) 57 Cal.App.5th 681, 705.

The Parties' arguments regarding the right to discovery under Rule 10.1 similarly do not limit the Commission's ability to establish an expedited schedule. Rule 10.1 provides that a party may obtain discovery "if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." As noted, SPD-37 creates a limited, expedited proceeding to address three outstanding process issues regarding *how* a subsequent request for program costs will be considered and reviewed as part of a much larger SB 884 process. No underlying programmatic proposals or costs are at issue here. Although the AFR fails to identify any discovery needed regarding establishing these procedural requirements, parties will still have the opportunity to proffer discovery that satisfies Rule 10.1, as discussed further below.

Finally, the Parties' case law supporting the argument that the CPUC has failed to follow its own procedures appears to be flawed. The *Sierra Club v. Public Utilities Comm'n* (2006) 140 Cal.App.4th 1045 case does not exist, as cited, and does not support the specific arguments asserted regarding party participation and the opportunity to be heard having "the force and effect of law."<sup>48</sup> Moreover, *Greene v. McElroy* (1959) 360 U.S. 474 and *California Motel Assn. v. Industrial Welfare Comm'n* (1979) 25 Cal.3d 200 do not contain the proffered quote that an administrative agency "must comply with its own regulations" or the purported principle for which they are cited.<sup>49</sup>

### **C. The Commission Has Provided Due Process For The Parties**

The Parties' argument that the response time limitation and lack of party status definition in SPD-37 deprives them of due process and the ability to meaningfully participate in the future

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<sup>48</sup> AFR, p. 6. There appears to be an unpublished, noncitable decision entitled *Sierra Club v. California Public Utilities Comm'n*, 2016 WL 6996153, from 2016. However, the case does not contain the quoted language and is factually distinguishable. In that case, the Court concludes that the "obviously sophisticated ... petitioners in proceedings before the PUC" had not proven "a lack of notice that the size of the contract finally approved by the PUC could be different than desired" by the real parties in interest.

<sup>49</sup> AFR, p. 5.

proceeding similarly has no merit.<sup>50</sup> Due process exists here because the Parties have received notice and will have opportunity to address the Utilities' forthcoming Phase 1 Joint Application.<sup>51</sup> Once the application is filed, a Commissioner will be assigned to oversee the case, and an Administrative Law Judge will likely be assigned to conduct the proceeding.<sup>52</sup> The assigned commissioner will "prepare and issue by order or ruling a scoping memo that describes the issues to be considered and the applicable timetable for resolution and that, *consistent with due process*, public policy, and statutory requirements, determines whether the proceeding requires a hearing."<sup>53, 54</sup> The AFR acknowledges this point on page 8. SPD-37 thus permits full involvement in the proceeding that will be opened with the Phase 1 Joint Application.

As noted, as part of the proceeding, the Parties will have the opportunity to conduct relevant discovery. It is true that limited discovery, if any, will be immediately available between the filing of the Phase 1 Joint Application and the initial intervenor response due in 15 days. However, that does not preclude discovery following that initial comment period. Presumably the scoping memo will set forth rules and expectations on discovery during the pendency of the Phase 1 Joint Application. Moreover, SPD-37 does not prevent discovery from being promulgated under Rule 10.1 during the pendency of the formal proceeding.

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<sup>50</sup> AFR, pp. 7-10. On p. 9 of the AFR, the Parties cite to Rule 14.1 of the CPUC's Rules of Practice and Procedure as "governing the submission and consideration of evidence." However, Rule 14.1 only provides definitions for various types of recommended decisions.

<sup>51</sup> On p. 8 of the AFR, the Parties erroneously cite to *Consumers Lobby Against Monopolies v. Public Utilities Com.* (1979) 25 Cal.3d 891, 901 for the principle that the "essence of due process is the requirement that 'a person in jeopardy of serious loss [be given] notice of the case against him and opportunity to meet it.'" That citation does not exist in *Consumer Lobby Against Monopolies* but is found in *Today's Fresh Start, Inc. v. Los Angeles County Office of Education* (2013) 57 Cal.4th 197, 212.

<sup>52</sup> See Pub. Util. Code § 1701.1(c).

<sup>53</sup> See Pub. Util. Code § 1701.1(c), emphasis added; see also Rule 7.5.

<sup>54</sup> As indicated in Pub. Util. Code § 1701.1(c) and Rule 7.5, a hearing is not required in this application. See also *Re Pac. Gas & Elec. Co.* (Dec. 22, 1986) 23 CPUC 2d 352 (Though it regularly conducts administrative hearings, the Commission has never considered the adoption of the rules contained in the Administrative Procedure Act and has not exercised its options to adopt those rules.)

Due process also exists because the Parties have participated meaningfully in the creation of EUP Guidelines and SPD-37.<sup>55</sup> As demonstrated in the factual background of this response, the Parties have participated in workshops, and submitted numerous sets of comments, on SB 884, the EUP process, and EUP guidelines, including SPD-15 and SPD-37, over the past three years. The topics included in the Phase 1 Joint Application—cost benefit ratios, audit procedures, and other cost recovery conditions—were part of the prior workshop or comment opportunities.<sup>56</sup> Thus, the Parties have already provided insight and influence into setting up an expedited electrical distribution undergrounding program.

Finally, resolution of the Phase 1 Joint Application is not the last opportunity for the Parties to be meaningfully involved in shaping future EUPs. As noted above, under SB 884, Energy Safety and the CPUC have up to nine months to review an EUP filed by a large electrical corporation as well as the associated cost recovery application.<sup>57</sup> During those periods, the EUP Guidelines contemplate discovery for interested parties regarding factual matters.<sup>58</sup> The Parties may elect to participate in that process as well.

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<sup>55</sup> AFR, p. 8.

<sup>56</sup> See e.g., Audit Requirements (Questions for Stakeholders Regarding the CPUC SB-884 Guidelines, October 14, 2024); Other Cost Recovery Conditions, Audit Requirements, Cost Benefit Ratios (Pre-Workshop Planning Questions for Stakeholders Regarding the CPUC SB-884 Guidelines, (March 27, 2025) and Pre-Workshop Planning Questions for Stakeholders Regarding the CPUC SB-884 Guidelines, April 11, 2025).

<sup>57</sup> See Pub. Util. Code § 8388.5.

<sup>58</sup> See 10-Year Electrical Undergrounding Plan Guidelines (February 20, 2025), p. 74; Res. SPD-37, p. 7.

