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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Petition of the City and County of San Francisco for a Valuation of Certain Pacific Gas & Electric Company Property Pursuant to Public Utilities Code Sections 1401-1421.

Petition 21-07-012

ADMINISTRATIVE LAW JUDGE'S RULING DENYING MOTIONS TO ORDER COMPLIANCE WITH RULING AND PROVIDE RESPONSES TO DATA REQUESTS

This ruling addresses two motions filed by Pacific Gas and Electric Company (PG&E) on August 21, 2025. The first motion is to order the City and County of San Francisco (CCSF) to comply with certain data requests pursuant to the October 28, 2024, ruling by the assigned Administrative Law Judge (ALJ). PG&E filed a second motion requesting that CCSF be ordered to provide complete responses to certain data requests.

CCSF filed separate Responses on September 9, 2025, opposing PG&E's two motion. PG&E filed separate Replies on September 19, 2025.

1. Motion to Enforce ALJ Order

PG&E requests that CCSF be ordered to comply with the October 28, 2024, ALJ ruling that granted in part motions by PG&E to compel data request responses.

Specifically, PG&E states that CCSF did not provide complete responses to the following data requests that were granted in the ALJ ruling:

Data Requests Set 1 – Request Nos. 2, 13, 21, and 22

Data Requests Set 2 – Request Nos. 3, 4, 7, and 16

Data Requests Set 3 – Request No. 20

Data Requests Set 5 – Request Nos. 4, 11, and 12

Appendix “A” of this ruling contains a description of the specific data requests by PG&E.¹

2. Motion to Provide Responses

This motion requests that CCSF be ordered to provide further and complete responses to the following data requests from PG&E:

Data Requests Set Eight, Requests Nos. 1-3

Data Requests Set Nine, Request No. 1

Data Requests Set Ten, Request Nos. 1-14

The requests in Data Requests Set Eight relate to information on the proposed taking and separation plan for the Martin Substation. Request No. 1 in Data Requests Set Nine is disclosure of CCSF’s plan for the Daly City Yard. Lastly, the requests in Data Requests Set Ten concerns information regarding potential post-taking charges.

3. CCSF Responses

Regarding the motion to enforce the ALJ ruling, CCSF comments that most of the requests relate to the reconfiguration of the Martin substation and a separation plan of PG&E’s assets. CCSF argues that PG&E mischaracterizes the ALJ ruling and states that much of the information PG&E is requesting is not yet available. CCSF adds that it is currently preparing a separation plan in coordination with the Commission’s Energy Division.

Regarding the Motion to provide responses to Data Request Sets Eight to Ten, CCSF states that it already provided adequate responses to PG&E.

¹ The list of Data Set Requests are taken from Appendix “A” of the ALJ Ruling dated October 28, 2024.

4. Discussion

On October 30, 2020⁵, the Commission issued Decision (D.)25-10-039 establishing methods and standards for just compensation and valuation that are applicable to this proceeding. D.25-10-039 also set forth testimony guidelines and minimum information that should be included. In Section 7.1 of the decision, CCSF was ordered to submit amended and restated testimony subject to specific guidelines set forth in said section of the decision. This includes the submission of a separation plan based on a single scenario, a complete asset list, and the scope and boundaries for the taking of the Martin substation.

A review of PG&E's two motions shows that the information PG&E is requesting CCSF be ordered to produce is part of the information that CCSF is directed by D.25-10-039 to include in its amended and restated testimony. Thus, we find that there is currently no need at this time for a separate order requiring CCSF to produce said information. Currently, the Commission is in the process of developing a schedule which includes serving of CCSF's amended and restated testimony.

Based on the above, we find it reasonable to deny the two motions filed by PG&E on August 21, 2025, without prejudice. If, after service of CCSF's amended and restated testimony, PG&E is of the opinion that there is needed information that is missing or incomplete, PG&E may reiterate all or part of the requests made in its August 21, 2025, motions by filing a subsequent motion.

Wherefore based on the foregoing, **it is RULED** that:

1. The two motions filed by Pacific Gas and Electric Company (PG&E) on August 21, 2025, to: (a) order the City and County of San Francisco (CCSF) to comply with the October 28, 2024, ruling by the assigned administrative law judge; and (b) to order the City and County of San Francisco to provide complete responses to certain data requests, are both denied without prejudice.

This ruling is effective today.

Dated February 2, 2026, at San Francisco, California.

/s/ Rafael L. Lirag
Rafael L. Lirag
Administrative Law Judge

APPENDIX A
PG&E Data Requests

Set 1

No. 2

Provide documents containing maps, drawings, or other visual representations sufficient to show the location of each of the assets identified in response to Request 1.

No. 13

With respect to the reference in the MND (at page 2) to “[a]dditional work ... including within the Olympic Club” – describe all such anticipated “additional work.”

No. 21

Provide all documents (including plans, drawings, cost estimates, and correspondence) relating to any construction project that CCSF intends to undertake to sever and/or reconfigure the electric transmission and distribution system currently owned by PG&E that is the subject of the Petition (P.21-07-012).

No. 22

All documents reflecting any change CCSF intends to implement to the operation of the electric transmission and distribution system currently owned by PG&E that is the subject of the Petition in the event the system is acquired by CCSF.

Set 2

No. 3

Identify with specificity each PG&E asset outside of the CCSF boundary (as indicated in your response to Request No.-2), that CCSF seeks to acquire in the PROPOSED ACQUISITION.

No. 4

To the extent that your response to Request No.-3 includes any substations outside of CCSF, describe with specificity what portions of those substations, and associated distribution breakers, would and would not be taken under CCSF's PROPOSED ACQUISITION.

No. 7

"Please provide a single line system diagram showing CCSF's proposed modifications to the transmission system in connection with the PROPOSED

ACQUISITION, including the proposed modifications such as installation of STATCOMs at Potrero Substation (*see* CCSF's Mitigated Negative Declaration dated January 5, 2022, Section A.4.2.3) and the reconfiguration of Martin Substation infrastructure for separation of the transmission and distribution system (Section A.4.2.2)."

No. 16

Provide copies of all documents that constitute CCSF plans, or draft plans, for separation of all or any aspect of the transmission and distribution system for electric service in CCSF from the remainder of PG&E's territory or operations, under the PROPOSED ACQUISITION.

Set 3

No. 20

Please provide a clearly defined severance plan for severing the assets to be acquired by CCSF from the assets to continue to be owned by PG&E, including an explanation of how CCSF envisions energy flowing into the city and what assumptions are being made regarding the supply of energy post sale.

Set 5

No. 4

"Explain whether CCSF:

- a) intends to become a Participating Transmission Owner with the California Independent System Operator ("CAISO"); or
- b) intends to have a transmission control agreement with CAISO."

No. 11

"With respect to the NOP's reference to a "Project Variant" involving CCSF taking PG&E's Daly City Yard:

- a) What does CCSF contend is the proper valuation of the Daly City Yard;
- b) Provide all analyses and workpapers regarding the value of the Daly City Yard;
- c) Describe with specificity the contemplated electrical layout of the Project Variant, and whether CCSF expects this new station to be served from Martin and if so how it would be

served (e.g., 115 kV line and CCSF provides transformation; or rerouting of the existing 12kV to support new station)?

- d) Provide all analyses and workpapers regarding the construction or other work to be performed on the Daly City Yard under any scenarios or variants contemplated by CCSF in its testimony or in the NOP;
- e) Describe in detail the relationship of the Daly City Yard to each of the three Martin Scenarios set forth in CCSF's testimony in this proceeding;
- f) With respect to the NOP's reference to the alternative involving not taking a fee interest in the Daly City Yard, but instead using it for a construction staging area,
 - 1. for what period of time would CCSF use the Daly City Yard, (2) what would CCSF pay to PG&E to compensate PG&E for the value of the temporary use of that Yard, (3) describe where and how the PG&E operations currently performed at the Daly City Service Center would be performed during the time period CCSF was using that Center's adjacent yard (including but not limited to what particular alternative location would be utilized during any period that CCSF's occupation of the Daly City Yard impaired or prevented operation of the Daly City Service Center)"

No. 12

CCSF's NOP states at page 5: "The project would reconfigure the existing Martin Substation transmission and distribution facilities to create separate City-owned and PG&E-owned systems. These changes could include adding/relocating cable terminations circuit breakers, cable trenches, and transformer locations within the existing substation fence. New electrical circuits and equipment would be installed entirely within Martin Substation." Describe all reconfigurations of Martin that would be entailed under each of CCSF's Scenarios-1 and 2, including but not limited to the specifics of the potential additions and relocations referenced in the NOP, and the new circuits and equipment that would be installed.