



BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED

01/20/26

04:59 PM

C2601023

Pamela Browning and Joesph Frankl,

Complainants,

vs.

Pacific Gas and Electric Company (U39E),

Defendant.

Case

Complaint
(Rule 4.2)

COMPLAINANTS	DEFENDANT
Pamela Browning and Joesph Frankl 1346 Wilson Road Cloverdale CA 95425 T: 301-943-2085 E-mail: pbrow@verizon.net	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)

Pamela Browning
Joseph Frankl

COMPLAINANT(S)

vs.

(B)

Pacific Gas & Electric Co.

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
Joseph Frankl	1346 Wilson Rd Cloverdale CA 95425	707-495-8049
Pamela Browning	same	301-943-2085

respectfully shows that:

(E)

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

Name of Defendant(s)	Address	Daytime Phone Number
Pacific Gas & Electric Co.	P.O. Box 997310, Sacramento, CA 95899-7310,	unknown

(F)

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

PLEASE SEE ATTACHMENT 1

(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):

See Attachment 2

(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): Feb 26, 2026

Hearing (Example: 7/1/09): March 27, 2026

Explain here if you propose a schedule different from the above guidelines.

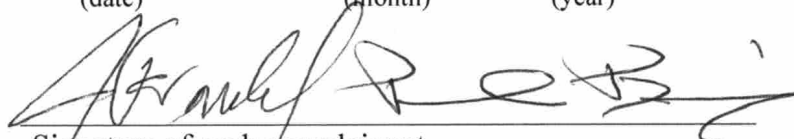
(H)
Wherefore, complainant(s) request(s) an order: State clearly the exact relief desired. (Attach additional pages if necessary)

SEE ATTACHMENT 3

(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:

pbrow@verizon.net

(J)
Dated Cloverdale, California, this 16 day of January, 2026
(City) (date) (month) (year)


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: _____

Address: _____

Telephone Number: _____

E-mail: _____

Signature: _____

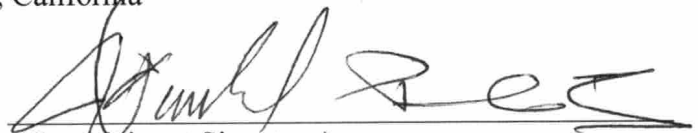
VERIFICATION
(For Individual or Partnerships)

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 January 16, at Cloverdale, California
(date) (City)


(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.


Signature _____ Date 1/16/2016

 
Print your name _____

ATTACHMENT 1 - DETAILS OF COMPLAINT

Just before the Christmas holidays, I was contacted by Heather Rowe of PG&E by telephone and informed that PGE is coming onto my husband's and my property to put in a higher pole next to our house to carry increased voltage. (While there are 3 PG&E poles on our property, at this time she only mentioned the one near our house.)

The pole that was being discussed is about 30' from our house and about 15' from our carport.

I told Ms. Rowe that we object to this plan since the pole is so close to our house and carport, and that we would like the line underground or that we are willing to give PG&E an easement to move the line further away from our house. Since we own 12 acres, there is no need for this line to be so close to our house and having this close to our house is unreasonable. And since we live on a hill, it would not be hard to put the line underground in this section.

I pointed out that different contractors from PG&E come onto our property almost every week to inspect one poll or another, check lower lines, higher lines, lower vegetation, taller trees, hardware, etc., and that if the lines were put underground it would save them money and save us a lot of intrusion.

But more importantly, we believe that a bigger pole so close to our house is not consistent with the easement granted to PG&E, would violate distance/setback requirements for utility infrastructure near habitable structures, and would violate standards for utility setbacks and other requirements for utility infrastructure in high risk wildfire areas. We have been unable to assess these matters due to PG&E's refusal to provide us with relevant information concerning their planned infrastructure upgrades despite our request.

We are also concerned that a bigger pole (and potentially increased voltage) would create an unreasonable burden on us by:

- 1) significantly decreasing the property value of our house given the location of the pole so near to our home;
- 2) create unknown health concerns and risks from both electric and especially magnetic fields of radiation;
- 3) create an aesthetic blight on our home, that will be impossible to shield; and
- 4) increase fire risks to our home should the pole fall or send off sparks.

During our phone conversation, I asked Ms. Rowe what the height of the pole would be and what the voltage on the pole would be. She said she did not know. I asked her to provide me this information. She called me one more time, and I asked her again for this information. She again did not have it, and she never got back to me with this information despite my requests.

On January 9, she left me a phone message indicating that PG&E planned to access our property and proceed with their plans. She still did not provide me with answers to my questions.

I proceeded to text her (I did not have her email address), and I informed her that I planned to appeal PG&E's plans and that I wanted her to email me a copy of PG&E's Easement/Right of Way on our property and to provide the information regarding 1) what is the current height of the pole and what is the proposed height? 2) What is the current voltage and what will be the future voltage? 3) How close is the pole to our house, and 4) how close is it to our carport.

On January 13, Ms. Rowe emailed me to let me know they were proceeding with their plans in just a few days. She failed to provide me with a copy of their easement on my property and she failed to answer my questions regarding the current and proposed heights for the poles and the current and future voltage for the poles. The answers she provided me were vague and would enable PG&E and its contractors to avoid accountability and deny us recourse.

She also mentioned for the first time that there would be work on all three poles on our property. The second pole is about 40' from our studio. And she mentioned that they would be using helicopters and because the pole is so close to our house, we would have to vacate our home. Of course this raises even more questions regarding the damage that the helicopter could cause to our home, trees, and to all the valuable gardens surrounding our home, to which we have invested a lot of time and money.

In this complaint we are asking:

- 1) the Commission to order PG&E to cease work on our property until this matter is resolved.
- 2) the Commission to order PG&E to move the poles further from our house, studio, and carport; or under ground the line consistent with any setback requirements and as a matter of safety, equity, and what is reasonable.
- 3 the Commission to order PG&E to provide a copy of the Easement/Right of Way they are relying on to access our property so we can assess whether PG&E's planned

infrastructure is consistent with the rights granted in the easement,

4) the Commission to order PG&E to provide information concerning the heights and voltage of the current poles and the heights and voltage of the planned infrastructure, including the construction drawing/plan set/engineering stakeout that will show exactly what infrastructure will be installed, where it will be installed, and the voltage it will operate at

5) the Commission to order PG&E to provide any information in their possession concerning any future plans for infrastructure to be deployed on our property within the next 15 years.

We are expecting that PG&E will keep adding voltage, height and width to this line, and now is the best time to change the route, before putting in new poles.

ATTACHMENT 2. - ISSUES TO BE CONSIDERED

In this complaint we are asking:

- 1) the Commission to order PG&E to cease work on our property until this matter is resolved.
- 2) the Commission to order PG&E to move the poles further from our house, studio, and carport; or under ground the line consistent with any setback requirements and as a matter of safety, equity, and what is reasonable.
- 3 the Commission to order PG&E to provide a copy of the Easement/Right of Way they are relying on to access our property so we can assess whether PG&E's planned infrastructure is consistent with the rights granted in the easement,
- 4) the Commission to order PG&E to provide information concerning the heights and voltage of the current poles and the heights and voltage of the planned infrastructure, including the construction drawing/plan set/engineering stakeout that will show exactly what infrastructure will be installed, where it will be installed, and the voltage it will operate at
- 5) the Commission to order PG&E to provide any information in their possession concerning any future plans for infrastructure to be deployed on our property within the next 15 years.

We are expecting that PG&E will keep adding voltage, height and width to this line, and now is the best time to change the route, before putting in new poles.

ATTACHMENT 3 - RELIEF REQUESTED

In this complaint we are asking:

- 1) the Commission to order PG&E to cease work on our property until this matter is resolved.
- 2) the Commission to order PG&E to move the poles further from our house, studio, and carport; or under ground the line consistent with any setback requirements and as a matter of safety, equity, and what is reasonable.
- 3 the Commission to order PG&E to provide a copy of the Easement/Right of Way they are relying on to access our property so we can assess whether PG&E's planned infrastructure is consistent with the rights granted in the easement,
- 4) the Commission to order PG&E to provide information concerning the heights and voltage of the current poles and the heights and voltage of the planned infrastructure, including the construction drawing/plan set/engineering stakeout that will show exactly what infrastructure will be installed, where it will be installed, and the voltage it will operate at
- 5) the Commission to order PG&E to provide any information in their possession concerning any future plans for infrastructure to be deployed on our property within the next 15 years.

We are expecting that PG&E will keep adding voltage, height and width to this line, and now is the best time to change the route, before putting in new poles.