

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



**FILED**

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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

**OPENING COMMENTS OF THE PUBLIC ADVOCATES OFFICE  
ON THE PROPOSED SCOPING ISSUES**

**I. INTRODUCTION**

Pursuant to the Administrative Law Judge (ALJ) Carolyn Sisto's email ruling of February 3, 2026, requesting party feedback on the scoping issues proposed by ALJ Sisto at the January 30, 2026 Pre-Hearing Conference (PHC) in this proceeding, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) hereby submits its opening comments on the proposed scoping issues.<sup>1</sup>

Application (A.) 25-11-006 contains Pacific Gas & Electric Company's (PG&E) application for approval of PG&E's 2027 Gas Cost Allocation and Rate Design (CARD) proposals for 2027 through 2030 (Application).<sup>2</sup> Cal Advocates supports the proposed scoping issues, and recommends that Intervenor Testimony be due on September 1, 2026.

**II. DISCUSSION ON THE PROPOSED SCOPING ISSUES AND SCHEDULE**

**A. Cal Advocates Supports ALJ Sisto's Proposed Scoping Issues.**

Cal Advocates supports ALJ Sisto's Proposed Scoping Issues as seen in Attachment A of the ALJ's Email Ruling of February 3, 2026.

<sup>1</sup> ALJ Carolyn Sisto's Email Ruling of February 3, 2026. The ruling seeks opening comments on the draft scope of issues contained in the ruling by February 10, 2026 and reply comments on the draft scope of issues by February 17, 2026

<sup>2</sup> Application (A.) 25-11-006 at 1.

**B. Cal Advocates Opposes the date for Intervenor Testimony in PG&E’s and Intervenors Proposed Modified Schedule**

Cal Advocates supports all but one of the dates in the proposed modified schedule agreed upon by PG&E and the other intervenors. Cal Advocates does not support the proposed Intervenor Testimony date of August 18, 2026. Cal Advocates’ proposed date for Intervenor Testimony is September 1, 2026. PG&E proposes August 18, 2026, so that the Intervenor Testimony would be served before the 2023 GRC II evidentiary hearing date. However, all of the proposed dates for the 2023 GRC II are not yet final and are subject to revision. Cal Advocates sees no value in moving the deadline earlier in order to prepare for GRC II hearings since these dates have not been finalized. Furthermore, this proceeding combines two applications (Gas Cost Allocation Proceeding (GCAP) and Gas Transmission and Storage (GT&S)), making this proceeding complex.

**III. CONCLUSION**

Cal Advocates respectfully requests that ALJ Sisto’s proposed scoping issues be adopted in this proceeding as noted above. Additionally, Cal Advocates requests that the proposed modified schedule be adopted with the modification that the Intervenor Testimony deadline be set for September 1, 2026.

Respectfully submitted,

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