

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



Application of Pacific Gas and Electric Company (U39E) for Approval of Electric Rule No. 30 for Transmission-Level Retail Electric Service.

Application 24-11-007

**FILED**

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**JOINT MOTION OF THE PUBLIC ADVOCATES OFFICE, THE UTILITY REFORM NETWORK, AND CALIFORNIA LARGE ENERGY CONSUMERS ASSOCIATION TO STAY THE PROCEEDING SCHEDULE UNTIL PACIFIC GAS AND ELECTRIC COMPANY'S MOTION TO SUPPLEMENT TESTIMONY IS RULED UPON AND FOR EXPEDITED HANDLING OF THE MOTION TO STAY**

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**JOINT MOTION OF THE PUBLIC ADVOCATES OFFICE, THE UTILITY  
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GAS AND ELECTRIC COMPANY’S MOTION TO SUPPLEMENT TESTIMONY  
IS RULED UPON AND FOR EXPEDITED HANDLING OF THE MOTION TO  
STAY**

Pursuant to Rule 11.1 of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure (Rules), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), The Utility Reform Network (TURN), and California Large Energy Consumers Association (CLECA) (collectively “Moving Parties”) hereby respectfully request: (1) the Administrative Law Judge (ALJ) stay the schedule in this proceeding until PG&E’s forthcoming motion to supplement its testimony is ruled upon, and (2) the ALJ expedite handling of this Joint Motion as opening testimony is due on February 18, 2026.

In the *Administrative Law Judge’s Ruling Establishing Proceeding Schedule* (ALJ Ruling), the ALJ set February 18, 2026, as the deadline for limited opening testimony on questions presented in the ALJ Ruling to be submitted.<sup>1</sup> On February 4, 2026, Pacific Gas and Electric Company (PG&E) notified the service list via email that it planned to submit a motion for leave to submit supplemental testimony on three issues from the Scoping Memo.<sup>2</sup> <sup>3</sup> Rather than do so in a timely fashion, PG&E has informed the parties that it will not submit its motion to submit supplemental testimony and its supplemental testimony until

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<sup>1</sup> Application (A.) 24-11-007, *Administrative Law Judge’s Ruling Establishing Proceeding Schedule* (ALJ Ruling), January 9, 2026, at 7.

<sup>2</sup> A.24-11-007, *Assigned Commissioner’s Scoping Memo and Ruling on Pacific Gas and Electric Company’s Request to Implement a New Electric Rule 30 Tariff* (Scoping Memo), March 11, 2025, at 6-8.

<sup>3</sup> See Attachment A (email from PG&E to A.24-11-007 service list dated February 4, 2026).

February 18, 2026, the same day that limited opening testimony is due.<sup>4</sup> PG&E stated that its forthcoming motion requests that parties' testimony on PG&E's proposed supplemental testimony would be due on the same day as rebuttal testimony on the additional issues from the ALJ Ruling.<sup>5</sup> During the meeting, Cal Advocates requested that PG&E email the ALJ to request a stay of the schedule so that deadlines for limited opening testimony on the ALJ Ruling and PG&E's proposed supplemental testimony could be aligned. PG&E stated it would consider the request.<sup>6</sup> As of the filing of this Joint Motion, PG&E provided no clear response to this request.

Good cause exists for the requested stay. Further, parties' right to due process may be infringed upon if they are not given a meaningful opportunity to submit limited opening testimony on PG&E's proposed supplemental testimony. In addition, PG&E's proposed supplemental testimony may alter or impact Moving Parties', and other intervenors' limited opening testimony on the ALJ Ruling. It is in the interest of administrative efficiency to align testimony deadlines and ensure the proceeding schedule is clear.

Due process requires that intervenors be given the opportunity to submit opening testimony and rebuttal testimony on PG&E's proposed supplemental testimony, in addition to rebuttal testimony on the separate ALJ Ruling's three additional issues. Without such an opportunity, parties may be denied the ability to address disputed facts that the Commission should consider in making a final decision in this proceeding. PG&E's proposal to submit a motion requesting supplemental testimony with supplemental testimony attached on the same day as the ALJ Ruling limited opening testimony undermines due process because:

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<sup>4</sup> On February 11, 2026, Cal Advocates spoke with PG&E and PG&E indicated it may file its motion for supplemental testimony as soon as February 13, 2026.

<sup>5</sup> Rebuttal Testimony on the ALJ Ruling is due March 13, 2026. See ALJ Ruling at 7. Based on PG&E's proposal during meeting with parties, intervenors would be denied the opportunity to submit rebuttal testimony on intervenor testimony to PG&E's supplemental testimony.

<sup>6</sup> During the meeting, PG&E indicated it did not want to stay the schedule because it did not want to delay this proceeding. However, PG&E will not be prejudiced if the schedule is stayed and a new schedule is adopted. PG&E requested and the Commission granted an Interim Rule 30 under which PG&E can interconnect large-load customers pending a final decision on PG&E's Application. See Decision (D.25-07-039), *Decision Partly Granting and Partly Denying Pacific Gas and Electric Company's Motion for Interim Implementation of Electric Rule Number 30*, July 28, 2025. PG&E is also submitting exceptional case filings through the advice letter process in accordance with Electric Rules 2, 15, and 16, to interconnect large-load customers while this proceeding is ongoing. See, e.g., PG&E Advice Letter (AL) 7569-E, AL 7635-E, AL 7667-E, AL 7785-E, AL 7814-E.

- (1) PG&E is not guaranteed the ALJ will grant its motion, but parties are left in an unreasonable position of simultaneously responding to PG&E's motion, reviewing PG&E's supplemental testimony, and preparing rebuttal testimony on the ALJ Ruling;
- (2) Parties will be waiting for the ALJ's ruling on PG&E's forthcoming motion while not knowing whether to move forward on whatever testimony needs to be prepared and by whatever deadline;
- (3) PG&E's proposed schedule would deny parties the opportunity to review the supplemental testimony prior to submitting opening testimony on the ALJ Ruling; and
- (4) Parties would have insufficient time to respond to PG&E's supplemental testimony if intervenor testimony is due on March 13, concurrent with rebuttal testimony on the questions in the ALJ Ruling.<sup>7</sup>

Moving Parties hereby request the schedule be stayed until PG&E submits its motion to supplement testimony. Then, only if the ALJ grants PG&E's request, should PG&E serve its supplemental testimony. Moving Parties further request that, should the ALJ grant PG&E's motion to supplement testimony, a new schedule be set which aligns the various deadlines.<sup>8</sup> Moving Parties request a similar amount of time provided in the ALJ Ruling to respond to PG&E's supplemental testimony, if granted, after the ALJ rules on PG&E's motion.

Cal Advocates asked other parties if they agreed with the requested stay until the ALJ rules on PG&E's forthcoming motion. The California Community Choice Association (CalCCA) does not oppose this Motion. When asked for their position on the Joint Motion, PG&E indicated it would oppose. PG&E, however, also suggested that the parties agree on a schedule.

Moving Parties request expedited handling of this Motion to stay the schedule because limited opening testimony is currently due on February 18, 2026, which is one

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<sup>7</sup> ALJ Ruling at 7.

<sup>8</sup> Establishing a procedural schedule that coordinates one set of deadlines for limited opening testimony on the ALJ Ruling and PG&E supplemental testimony, if granted, and for each subsequent deadline will allow for a clearer record and promotes judicial efficiency.

week from today.<sup>2</sup> <sup>10</sup> It is important for parties to know the scope of limited opening testimony and when it is due before the February 18, 2026, deadline, to prevent prejudice to the parties and ensure that the deadlines in proceeding schedule to submit testimonies is clear. The requested stay while a ruling is pending on PG&E's motion to supplement testimony will ensure judicial efficiency by consolidating deadlines without prejudicing any party.

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<sup>2</sup> ALJ Ruling at 7.

<sup>10</sup> The Joint Motion is being filed today because of the pending deadline on February 18, 2026, and PG&E soon-to-filed motion for supplemental testimony. Parties remain willing to negotiate with PG&E.

Respectfully submitted,

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February 11, 2026

# **ATTACHMENT A**

**From:** [Brenc, William \(Law\)](#)  
**To:** [Katy Morsony](#); [Roschen, Jane](#); [Jerri Strickland](#); [Jeremy Waen](#); [Maren Wenzel](#); [Akiya, Kimiko](#); [Seth.Hilton@stoel.com](#); [ETorres@turn.org](#); [John Newton](#); [Sabrinna Soldavini](#); [Faith Carlson](#); [blaising@braunlegal.com](#); [RegRelCPUCCases](#); [Klatt@EnergyAttorney.com](#); [Jennifer Baak](#); [Leanne Bober](#); [CalCCA Regulatory](#); [Meghan.OBrien@Stoel.com](#); [Christa.Lim@shell.com](#); [cfaber@sdge.com](#); [ZBranum@sdge.com](#); [RKoss@AdamsBroadwell.com](#); [Lilly.McKenna@Stoel.com](#); [Cragg, Brian](#); [NSheriff@Buchalter.com](#); [SHafez@Buchalter.com](#); [Dauler, Heather](#); [Joe@JFWiedman.com](#); [akilduff@caiso.com](#); [csanada@caiso.com](#); [khead@caiso.com](#); [vrubtsova@caiso.com](#); [SKozal@caiso.com](#); [bbiering@b2energylaw.com](#); [regulatory@braunlegal.com](#); [McCormack, Martin](#); [Peck, David B.](#); [Rodriguez, Emil](#); [Dersch, Rachel](#); [Hogan, Christopher](#); [Khoe, Richard](#); [Lyser, Shelly](#); [Bone, Traci](#); [Ornelas, Karen Khamou](#); [Soto, Adam](#); [Pierson, Sharon](#); [Moffat, Ben](#); [Rogers, Sienna](#); [Batten, Natasha](#); [Raman, Divya](#); [Brenc, William \(Law\)](#); [cathy@barkovichandyp.com](#); [Catherine Yap](#); [Kwatra, Sanya](#); [Toy, Deanna](#); [Middlekauff, Charles \(Law\)](#)  
**Subject:** [EXTERNAL] PG&E Electric Rule 30 - Motion for Leave to Submit Supplemental Testimony  
**Date:** Wednesday, February 4, 2026 12:40:07 PM

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi all,

I hope everyone is having a good start to the year.

In addition to the testimony in response to the additional questions posed by ALJ Toy in his Jan. 9 order, PG&E plans to move for leave to submit supplemental testimony addressing three issues: (a) revisions to PG&E’s proposed minimum demand charge methodology; (b) an option for transmission-level customers to perform undergrounding work and certain Facility Type 3 work as a part of the Applicant Build Option; and (c) additional requirements in the Electric Rule 30 form agreement to provide added protection for existing ratepayers.

We plan to file that motion on Feb. 18, concurrently with the additional testimony in response to ALJ Toy’s questions. We’re hoping to meet with you all next week to address questions you may have regarding PG&E’s motion and supplemental testimony, and to determine whether other parties plan to oppose PG&E’s motion.

Please let me know your availability next week. PG&E is available at the following times:

Mon (2/9): 9-10; 12-2

Tu (2/10): 1-130

Wed (2/11): 9-10; 12-1; 230-3

Th (2/12): 1230-230

F (2/13): 1230-1; 130-3

Thanks, Willie

William Brenc – Counsel, Law

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You can read about PG&E's data privacy practices at [PGE.com/privacy](https://www.pge.com/privacy).