



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

FILED

02/12/26

10:04 AM

A2411007

Application of Pacific Gas and Electric
Company (U 39 E) for Approval of Electric
Rule No. 30 for Transmission-Level Retail
Electric Service

(U 39 E)

Application No. 24-11-007
(Filed November 21, 2024)

**PACIFIC GAS AND ELECTRIC COMPANY'S RESPONSE TO 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**

WILLIAM BRENC
CHARLES MIDDLEKAUFF

Pacific Gas and Electric Company
Law Department, 19th Floor
300 Lakeside Drive, Suite 210
Oakland, CA 94612
Telephone: (925) 204-4952
Email: william.brenc@pge.com

Dated: February 12, 2026

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

Application of Pacific Gas and Electric
Company (U 39 E) for Approval of Electric
Rule No. 30 for Transmission-Level Retail
Electric Service

(U 39 E)

Application No. 24-11-007
(Filed November 21, 2024)

**PACIFIC GAS AND ELECTRIC COMPANY’S RESPONSE TO 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**

I. INTRODUCTION

Pursuant to California Public Utilities Commission (CPUC or Commission) Rule 11.1(e), Pacific Gas and Electric Company (PG&E) opposes the joint motion (Joint Motion) of the Public Advocates Office of the Commission (Cal Advocates), The Utility Reform Network (TURN), and the California Large Energy Consumers Association (CLECA) (together, “Moving Parties”) to stay the proceeding pending a ruling on PG&E’s proposed motion for leave to submit supplemental testimony. PG&E believes the current schedule provides sufficient time for parties to address the limited issues that will be raised in PG&E’s motion for supplemental testimony, which PG&E intends to file tomorrow (February 13). Alternatively, in lieu of an indefinite stay, PG&E proposes – as it has proposed to the other parties in this proceeding – that the Commission continue the schedule in this proceeding, as outlined below. Continuing the schedule will address the

parties' concerns regarding timing of their response to PG&E's proposed supplemental testimony, while not unduly delaying this proceeding.

This proceeding was filed in November 2024. Based on the current schedule, a proposed decision will likely not be issued until the end of July 2026 and a final decision in August or September, 2026. The Moving Parties' request for an indefinite stay will significantly delay the final resolution of this proceeding, likely until late 2026 or 2027, more than two years after PG&E's initial filing. The Moving Parties' proposal for an indefinite stay is inconsistent with the Commission's recent statement to the Federal Energy Regulatory Commission (FERC) that the CPUC is actively working on state jurisdictional tariffs and expects to issue a decision on Electric Rule 30 by mid-2026.¹ More importantly, the Moving Parties' proposal for an indefinite delay will mean that PG&E and transmission-level customers must continue to rely on negotiating one-off agreements and submitting these agreements for Commission approval through exceptional case filings rather than having a uniform approach under a Commission-approved tariff and form agreement. The current one-off approach is adverse to the very customers that the Moving Parties represent (*i.e.*, existing ratepayers and new transmission-level customers) because it unnecessarily delays a Commission decision which would provide clear direction on transmission-level customer cost responsibility and existing ratepayer protections.

There is no need for the indefinite stay requested by Moving Parties and their motion should be denied. Alternatively, if the Commission believes a stay is necessary, it should adopt the proposal that PG&E made to the Moving Parties before they filed their motion.

II. BACKGROUND

On November 21, 2024, PG&E filed an application for proposed Electric Rule 30,

¹ *Initial Comments of the California Public Utilities Commission*, Docket No. RM26-4-000, filed November 21, 2025 at 2.

which provides for “the interconnection of new customers requesting retail electric service at transmission level voltages between 50 kilovolts (kV) and 230 kV. . . .”² On January 9, 2026, Judge Toy issued the *Administrative Law Judge’s Ruling Establishing Proceeding Schedule* (Scheduling Order), ordering the parties to provide limited testimony in response to six questions by February 18, 2026.

On February 4, 2026, PG&E proactively provided notice to the other parties in this proceeding that it intended to move for leave to file supplemental testimony on three discrete topics: (1) revisions to PG&E’s proposed minimum demand charge methodology; (2) 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 (3) additional requirements in the Electric Rule 30 form agreement to provide added protection for existing ratepayers. PG&E also scheduled a call with parties to discuss its proposed motion. Although PG&E was not required to provide the parties with notice of its intent to file a motion or to schedule a call to discuss the motion, it voluntarily did so in order to continue the collaborative working relationship that has developed between the parties in this proceeding and to get feedback (and hopefully support) from the parties for its motion.

PG&E planned to file its motion for leave to file supplemental testimony concurrently with its limited additional testimony on February 18, 2026, which would allow parties to prepare rebuttal testimony to PG&E’s supplemental testimony within the timeline for rebuttal testimony in the Scheduling Order. The parties conferred by videoconference on February 9, 2026 regarding this motion and proposed supplemental testimony. During the call, PG&E explained: (1) the substance of its supplemental testimony; (2) that it intended to file a motion for leave to file supplemental testimony; and (3) that the supplemental testimony would be attached to PG&E’s motion. While the

² *Assigned Commissioner’s Scoping Memo and Ruling on Pacific Gas and Electric Company’s Request to Implement a New Electric Rule 30 Tariff*, at 1.

parties did not state whether they opposed PG&E's motion, some parties expressed concerns regarding having adequate time to respond to PG&E's proposed supplemental testimony. PG&E acknowledged and agreed to consider the parties' concerns.

As a result of the parties' concerns, PG&E made several changes to its proposal. First, rather than file its motion for leave to file supplemental testimony on February 18, PG&E decided to file its motion on February 13 to give parties additional time to review the motion and the proposed supplemental testimony. Second, counsel for TURN attorney proposed that PG&E agree to expedited discovery on its supplemental testimony to facilitate party review and so that parties could prepare rebuttal testimony by March 13 consistent with the Scheduling Order. In response to TURN's feedback, PG&E has voluntarily agreed to expedite discovery with a five (5) business day turn around based on best efforts.

After the February 9 call, PG&E did not initially hear anything further from the Moving Parties. Then, on February 11, 2026, at 10:15 a.m., PG&E received an email from Cal Advocates stating that Cal Advocates planned to move to stay this proceeding and requesting a response from PG&E by 12:00 p.m. the same day.³ PG&E promptly responded that it would be interested in discussing Cal Advocates' motion and suggested that the parties arrange a call. PG&E offered to make itself available any time that worked for Cal Advocates. Cal Advocates initially declined to have a call with PG&E, but ultimately agreed to conduct a quick call.

PG&E and Cal Advocates conferred by telephone at about 12:00 p.m. on February 11, 2026. On that call, PG&E informed Cal Advocates that it (1) would file its motion for leave to file supplemental testimony by Friday, February 13, 2026 to allow parties additional time to respond to the testimony;⁴ (2) would agree to respond to data requests

³ See Attachment A.

⁴ The Joint Motion incorrectly states that PG&E still planned to file its motion for leave to file supplemental testimony on February 18, 2026. See Joint Motion at 2.

relating to the proposed supplemental testimony within five business days of receipt; and (3) was amenable to a continued schedule in the proceeding to allow parties additional time to respond to PG&E's proposed supplemental testimony. Cal Advocates said it would consider PG&E's proposal.

Shortly after that call, PG&E emailed counsel for Cal Advocates, TURN, CLECA, and the California Community Choice Association (CalCCA) with a proposal for a continued schedule.⁵ PG&E proposed the following schedule, and suggested that the parties jointly contact Administrative Law Judge Toy proposing the continued schedule:

- February 13, 2026: PG&E files Motion for Leave to File Supplemental Testimony, with the proposed testimony as an attachment
- March 13, 2026: Parties file testimony in response to the Scheduling Order
- April 8, 2026: Parties file rebuttal testimony in response to the issues in the Scheduling Order; parties other than PG&E file rebuttal testimony in response to PG&E's proposed supplemental testimony; PG&E waives its right to file rebuttal testimony regarding its own supplemental testimony
- April 17, 2026: Judge Toy determines whether evidentiary hearings are appropriate regarding the issues in the Scheduling Order and PG&E's proposed supplemental testimony
- April 24, 2026: If needed, evidentiary hearings on the issues in the Scheduling Order and PG&E's proposed supplemental testimony
- May 8, 2026: Opening Briefs filed on the issues in the Scheduling Order and PG&E's proposed supplemental testimony
- May 22, 2026: Reply Briefs filed on all issues.

No party responded to PG&E's proposal.⁶ Instead, later that afternoon, Cal

⁵ See Attachment B.

⁶ The Motion incorrectly states that “[a]s of the filing of this Joint Motion” PG&E “provided no clear response” to Cal Advocates’ request that the PG&E e-mail Judge Toy and request a stay. See Joint Motion at 2. In fact, before the Motion was filed, PG&E communicated by e-mail to the Moving Parties that it would agree to e-mail Judge Toy with the schedule described above. The Moving Parties never responded to this proposal and instead filed the Joint Motion.

Advocates, CLECA, and TURN unilaterally filed their joint motion to stay.

III. THE JOINT MOTION SHOULD BE DENIED

Indefinitely staying this proceeding is not appropriate under the circumstances and will unduly prejudice customers seeking to apply for an interconnection under Electric Rule 30. By statute, applications that are ratesetting or quasi-legislative must be resolved within 18 months.⁷ The Moving Parties do not offer a proposed schedule. Instead, they suggest an open-ended approach, waiting for a ruling on PG&E's motion for leave to file supplemental testimony and then, if PG&E's motion is granted, developing "a new schedule be set which aligns with various deadlines."⁸ Although not explicitly stated in the Joint Motion, during the February 9, 2026 telephone call, parties indicated that the "various deadlines" would include coordination with PG&E's 2027 General Rate Case (GRC) and that, if a stay was granted, the schedule may be delayed substantially to align with the 2027 GRC. The Moving Parties' proposal for an indefinite stay will necessarily result in further undue delay.

There is no reason to change the current schedule in this proceeding, nor is there any basis for the Moving Parties' assertion that PG&E's motion for leave to file supplemental testimony violates their due process rights. PG&E intends to file its motion for leave to submit supplemental testimony tomorrow, Friday, February 13, 2026. Parties retain their full due process rights to oppose PG&E's motion. Moreover, because PG&E will be attaching its supplemental testimony to its motion, parties will have a month, until March 13, to review PG&E's supplemental testimony and prepare rebuttal testimony. Moreover, PG&E has voluntarily agreed to expedited discovery regarding its supplemental testimony which will provide parties ample opportunity to conduct

⁷ Cal. Code of Regs 2.6(d); *see also* CPUC Rule 2.1(c).

⁸ Joint Motion at 3.

discovery and prepare rebuttal testimony. The Moving Parties have not and cannot articulate a genuine concern that PG&E’s motion impacts their due process rights.

If Moving Parties have concerns about PG&E’s proposed supplemental testimony, the appropriate remedy is to oppose PG&E’s motion for leave to file this testimony. It is not appropriate, however, to indefinitely delay this proceeding with an open-ended stay, especially given that this proceeding has been pending for almost 15 months, near the end of the statutory deadline.

IV. IF THE COMMISSION BELIEVES A LIMITED STAY IS APPROPRIATE, PG&E’S PROPOSED SCHEDULE SHOULD BE ADOPTED.

If the Commission believes that a limited delay of the current schedule is appropriate, it should not adopt the Moving Parties’ proposal for an indefinite stay. Instead, prior to the Joint Motion being filed, PG&E proposed to the Moving Parties a reasonable alternative schedule that could be adopted. Table 1 below includes the current schedule and PG&E’s proposal.

Table 1: Current and PG&E Proposed Schedule

Activity	Current Schedule	PG&E Proposal
PG&E Motion for Leave to File Supplemental Testimony	N/A	February 13, 2026
Parties file Initial Testimony Responding to ALJ Questions	February 18, 2026	March 13, 2026
Parties File Rebuttal Testimony on ALJ Questions and Intervenors File testimony on PG&E’s Supplemental Testimony	March 13 (filing date for rebuttal to ALJ Questions)	April 8, 2026
Parties submit Joint Motion Regarding need for Evidentiary Hearings	March 23, 2026	April 17, 2026
Evidentiary Hearings (if needed)	April 1, 2026	April 24, 2026
Opening Brief on ALJ Questions and PG&E Supplemental Testimony	April 10, 2026	May 8, 2026
Reply Brief on All Issues	April 24, 2026	May 22, 2026

PG&E’s proposed schedule addresses all of the concerns expressed in the Joint Motion, while limiting the impact on customers. First, extending the deadline for parties to submit rebuttal testimony in response to PG&E’s proposed testimony to April 8, 2026 – in combination with PG&E’s agreement to file its motion on February 13, 2026 – provides the parties with nearly two full months to draft rebuttal testimony. This addresses the parties’ concern that their “due process rights may be infringed upon if they are not given a meaningful opportunity to respond.”⁹

Second, under PG&E’s proposal, it will waive the right to provide rebuttal testimony on the three topics addressed in its proposed supplemental testimony. This also negates any due process concerns.¹⁰ Every party gets one bite at the apple: PG&E provides supplemental testimony; other parties provide rebuttal testimony.

Third, parties will be able to review PG&E’s proposed supplemental testimony prior to providing additional testimony in response to the Scheduling Order.¹¹ To be clear, PG&E’s proposed supplemental testimony has no bearing on the questions asserted in the Scheduling Order.

Fourth, the dates in PG&E’s proposal are approximately the same duration between events as the current schedule, except that parties now have more time to prepare their initial testimony in response to the ALJ Questions and to review PG&E’s supplemental testimony.

Finally, given that parties will not need to provide rebuttal testimony until April 8, 2026, there is no concern that 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.”¹² Parties will know what the deadline is

⁹ Joint Motion at 2.

¹⁰ *Id.* at 2-3

¹¹ *Id.* at 3.

¹² *Id.*

ATTACHMENT A

Brenc, William (Law)

From: Akiya, Kimiko <Kimiko.Akiya@cpuc.ca.gov>
Sent: Wednesday, February 11, 2026 11:30 AM
To: Brenc, William (Law); Middlekauff, Charles (Law)
Cc: Peck, David B.; Roschen, Jane; McCormack, Martin
Subject: RE: [EXTERNAL] PG&E Electric Rule 30 - Motion for Leave to Submit Supplemental Testimony

!!! EXTERNAL SENDER !!!

This email came from outside PG&E. Think before you click. Be extra wary of links, attachments, providing sensitive information, and QR Codes. If this email seems suspicious, use the **REPORT PHISH BUTTON**.

Hi Willie and Charles,

We can jump on a 10 minute call at 11:50am. Please send Martin and I an invite.

Thanks,
Kimiko

From: Brenc, William (Law) <W2BM@pge.com>
Sent: Wednesday, February 11, 2026 11:15 AM
To: Middlekauff, Charles (Law) <CRMd@pge.com>; Akiya, Kimiko <Kimiko.Akiya@cpuc.ca.gov>
Cc: Peck, David B. <david.peck@cpuc.ca.gov>; Roschen, Jane <Jane.Roschen@cpuc.ca.gov>; McCormack, Martin <Martin.McCormack@cpuc.ca.gov>
Subject: RE: [EXTERNAL] PG&E Electric Rule 30 - Motion for Leave to Submit Supplemental Testimony

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.

One additional note here. After hearing your concerns on Monday's call, we have expedited our internal review process and are planning to file our motion seeking leave to file supplemental testimony on Friday, to provide other parties additional time to respond. We are also including in our motion that PG&E has agreed to provide responses to data requests relevant to this supplemental testimony within 5 business days of receipt.

As Charles noted below, we'd like to discuss your concerns in more detail, with an eye towards finding a solution the parties can agree on.

Thanks, Willie

From: Middlekauff, Charles (Law) <CRMd@pge.com>
Sent: Wednesday, February 11, 2026 11:03 AM
To: Brenc, William (Law) <W2BM@pge.com>; Akiya, Kimiko <Kimiko.Akiya@cpuc.ca.gov>
Cc: Peck, David B. <david.peck@cpuc.ca.gov>; Roschen, Jane <Jane.Roschen@cpuc.ca.gov>; McCormack, Martin <Martin.McCormack@cpuc.ca.gov>
Subject: RE: [EXTERNAL] PG&E Electric Rule 30 - Motion for Leave to Submit Supplemental Testimony

Kimiko:

Jumping in here. We would like to discuss before you file so we can understand specifically what you are proposing and see if we can find potential solutions the parties can agree on. We believe it would be more productive PG&E and Cal Advocates to have a call to discuss rather than e-mails.

Let us know when Cal Advocates is available.

To the extent Cal Advocates is unable to talk today and goes forward with filing its motion, we would request the following statement be added to the motion: "PG&E was notified of Cal Advocates' motion on the day it was filed and was given two hours to react to Cal Advocates' proposal to file a motion. PG&E immediately requested to meet with Cal Advocates in advance of filing the motion so that the parties could discuss Cal Advocates' motion and try to find a resolution of Cal Advocates' concerns. Cal Advocates was unable to meet and proceeded with filing its motion."

Charles

From: Brenck, William (Law) <W2BM@pge.com>
Sent: Wednesday, February 11, 2026 11:00 AM
To: Akiya, Kimiko <Kimiko.Akiya@cpuc.ca.gov>; Middlekauff, Charles (Law) <CRMd@pge.com>
Cc: Peck, David B. <david.peck@cpuc.ca.gov>; Roschen, Jane <Jane.Roschen@cpuc.ca.gov>; McCormack, Martin <Martin.McCormack@cpuc.ca.gov>
Subject: RE: [EXTERNAL] PG&E Electric Rule 30 - Motion for Leave to Submit Supplemental Testimony

Hi Kimiko,

Do let us know what time would work for a short call today. We understand your concerns here and are hopeful we can talk through a resolution that works for all parties.

Best, Willie

From: Akiya, Kimiko <Kimiko.Akiya@cpuc.ca.gov>
Sent: Wednesday, February 11, 2026 10:55 AM
To: Brenck, William (Law) <W2BM@pge.com>; Middlekauff, Charles (Law) <CRMd@pge.com>
Cc: Peck, David B. <david.peck@cpuc.ca.gov>; Roschen, Jane <Jane.Roschen@cpuc.ca.gov>; McCormack, Martin <Martin.McCormack@cpuc.ca.gov>
Subject: RE: [EXTERNAL] PG&E Electric Rule 30 - Motion for Leave to Submit Supplemental Testimony

!!! EXTERNAL SENDER !!!

This email came from outside PG&E. Think before you click. Be extra wary of links, attachments, providing sensitive information, and QR Codes. If this email seems suspicious, use the **REPORT PHISH BUTTON**.

Hi Willie,

We are unfortunately pretty tied up this morning. Are you able to provide PG&E's position via email?

Thank you,
Kimiko

From: Brenc, William (Law) <W2BM@pge.com>
Sent: Wednesday, February 11, 2026 10:44 AM
To: Akiya, Kimiko <Kimiko.Akiya@cpuc.ca.gov>; Middlekauff, Charles (Law) <CRMd@pge.com>
Cc: Peck, David B. <david.peck@cpuc.ca.gov>; Roschen, Jane <Jane.Roschen@cpuc.ca.gov>; McCormack, Martin <Martin.McCormack@cpuc.ca.gov>
Subject: RE: [EXTERNAL] PG&E Electric Rule 30 - Motion for Leave to Submit Supplemental Testimony

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 Kimiko,

Thanks for the message. Would you be available to discuss at 11?

Thanks, Willie

From: Akiya, Kimiko <Kimiko.Akiya@cpuc.ca.gov>
Sent: Wednesday, February 11, 2026 10:14 AM
To: Brenc, William (Law) <W2BM@pge.com>; Middlekauff, Charles (Law) <charles.middlekauff@pge.com>
Cc: Peck, David B. <david.peck@cpuc.ca.gov>; Roschen, Jane <Jane.Roschen@cpuc.ca.gov>; McCormack, Martin <Martin.McCormack@cpuc.ca.gov>
Subject: RE: [EXTERNAL] PG&E Electric Rule 30 - Motion for Leave to Submit Supplemental Testimony

!!! EXTERNAL SENDER !!!

This email came from outside PG&E. Think before you click. Be extra wary of links, attachments, providing sensitive information, and QR Codes. If this email seems suspicious, use the **REPORT PHISH BUTTON**.

Good morning, Willie and Charles,

Today, Cal Advocates will be filing a motion to stay the schedule until the ALJ rules on PG&E's forthcoming motion for supplemental testimony. Similar to what we requested in the meeting on Monday, we will also ask for the dates testimonies are due to be coordinated and for sufficient time to respond PG&E's supplemental testimony, if granted.

Please provide PG&E's position on this motion by noon. Apologies for the short notice but it has been a busy morning.

Thank you,

Kimiko Akiya (she/her)

Attorney

Legal Division
California Public Utilities Commission
415-703-1588 | kimiko.akiya@cpuc.ca.gov
www.cpuc.ca.gov

CONFIDENTIALITY NOTICE: The information contained in this email communication, and any file(s) attached to it, may be confidential and may contain attorney/client-privileged information or work product. If the reader of this email is not the intended recipient (or the authorized agent responsible for delivering this email to the intended recipient), you have received this in error, and any review, dissemination, distribution or other use of this email is strictly prohibited. If you have received this email in error, please notify the sender by reply email and delete all copies of this email from your system.

From: Brenc, William (Law) <W2BM@pge.com>

Sent: Thursday, February 5, 2026 1:03 PM

To: Roschen, Jane <Jane.Roschen@cpuc.ca.gov>; Katy Morsony <katy@cal-cca.org>; Jerri Strickland <jstrickland@3ce.org>; Jeremy Waen <jwaen@peninsulacleanenergy.com>; Maren Wenzel <maren.wenzel@svcleanenergy.org>; Akiya, Kimiko <Kimiko.Akiya@cpuc.ca.gov>; Seth.Hilton@stoel.com; ETorres@turn.org; John Newton <jnewton@avaenergy.org>; Sabrina Soldavini <ssoldavini@mcecleanenergy.org>; Faith Carlson <fcarlson@redwoodenergy.org>; blaising@braunlegal.com; RegRelCPUCCases <RegRelCPUCCases@pge.com>; Klatt@EnergyAttorney.com; Jennifer Baak <jennifer@cal-cca.org>; Leanne Bober <leanne@cal-cca.org>; CalCCA Regulatory <regulatory@cal-cca.org>; Meghan.OBrien@Stoel.com; Christa.Lim@shell.com; cfaber@sdge.com; ZBranum@sdge.com; RKoss@AdamsBroadwell.com; Lilly.McKenna@Stoel.com; Cragg, Brian <bcragg@downeybrand.com>; NSheriff@Buchalter.com; SHafez@Buchalter.com; Dauler, Heather <heather.dauler@sanjoseca.gov>; 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 <Martin.McCormack@cpuc.ca.gov>; Peck, David B. <david.peck@cpuc.ca.gov>; Rodriguez, Emil <Emil.Rodriguez@cpuc.ca.gov>; Dersch, Rachel <Rachel.Dersch@cpuc.ca.gov>; Hogan, Christopher <Christopher.Hogan@cpuc.ca.gov>; Khoe, Richard <Richard.Khoe@cpuc.ca.gov>; Lyser, Shelly <Shelly.Lyser@cpuc.ca.gov>; Bone, Traci <traci.bone@cpuc.ca.gov>; Ornelas, Karen Khamou <K1K3@pge.com>; Soto, Adam <A8S6@pge.com>; Pierson, Sharon <SGT2@pge.com>; Moffat, Ben <B3MJ@pge.com>; Rogers, Sienna <Sienna.Rogers@pge-corp.com>; Batten, Natasha <NDBA@pge.com>; Raman, Divya <D3R7@pge.com>; cathy@barkovichandyp.com; Catherine Yap <ceyap2@sonic.net>; Kwatra, Sanya <Sanya.Kwatra@cpuc.ca.gov>; Toy, Deanna <DCT4@pge.com>; Middlekauff, Charles (Law) <CRMd@pge.com>

Subject: RE: [EXTERNAL] PG&E Electric Rule 30 - Motion for Leave to Submit Supplemental Testimony

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.

Thanks all.

930-10 on Monday appears to work. We'll send out an invite. Looking forward to discussing.

Best, Willie

From: Roschen, Jane <Jane.Roschen@cpuc.ca.gov>

Sent: Thursday, February 5, 2026 9:53 AM

To: Brenc, William (Law) <W2BM@pge.com>; Katy Morsony <katy@cal-cca.org>; Jerri Strickland <jstrickland@3ce.org>; Jeremy Waen <jwaen@peninsulacleanenergy.com>; Maren Wenzel <maren.wenzel@svcleanenergy.org>; Akiya, Kimiko <Kimiko.Akiya@cpuc.ca.gov>; Seth.Hilton@stoel.com; ETorres@turn.org; John Newton <jnewton@avaenergy.org>; Sabrina Soldavini <ssoldavini@mcecleanenergy.org>; Faith Carlson <fcarlson@redwoodenergy.org>; blaising@braunlegal.com; RegRelCPUCCases <RegRelCPUCCases@pge.com>; Klatt@EnergyAttorney.com; Jennifer Baak <jennifer@cal-cca.org>; Leanne Bober <leanne@cal-cca.org>; CalCCA Regulatory <regulatory@cal-cca.org>; Meghan.OBrien@Stoel.com; Christa.Lim@shell.com; cfaber@sdge.com; ZBranum@sdge.com; RKoss@AdamsBroadwell.com; Lilly.McKenna@Stoel.com; Cragg, Brian <bcragg@downeybrand.com>; NSheriff@Buchalter.com; SHafez@Buchalter.com; Dauler, Heather <heather.dauler@sanjoseca.gov>; 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 <Martin.McCormack@cpuc.ca.gov>; Peck, David B. <david.peck@cpuc.ca.gov>; Rodriguez, Emil <Emil.Rodriguez@cpuc.ca.gov>; Dersch, Rachel <Rachel.Dersch@cpuc.ca.gov>; Hogan, Christopher

<Christopher.Hogan@cpuc.ca.gov>; Khoe, Richard <Richard.Khoe@cpuc.ca.gov>; Lyser, Shelly <Shelly.Lyser@cpuc.ca.gov>; Bone, Traci <traci.bone@cpuc.ca.gov>; Ornelas, Karen Khamou <K1K3@pge.com>; Soto, Adam <A8S6@pge.com>; Pierson, Sharon <SGT2@pge.com>; Moffat, Ben <B3MJ@pge.com>; Rogers, Sienna <Sienna.Rogers@pge-corp.com>; Batten, Natasha <NDBA@pge.com>; Raman, Divya <D3R7@pge.com>; cathy@barkovichandyap.com; Catherine Yap <ceyap2@sonic.net>; Kwatra, Sanya <Sanya.Kwatra@cpuc.ca.gov>; Toy, Deanna <DCT4@pge.com>; Middlekauff, Charles (Law) <CRMd@pge.com>

Subject: RE: [EXTERNAL] PG&E Electric Rule 30 - Motion for Leave to Submit Supplemental Testimony

!!! EXTERNAL SENDER !!!

This email came from outside PG&E. Think before you click. Be extra wary of links, attachments, providing sensitive information, and QR Codes. If this email seems suspicious, use the **REPORT PHISH BUTTON**.

Hi Willie,

Thank you for reaching out. Cal Advocates is available to meet at any of the times you proposed for Monday (2/9), Tuesday (2/10), and Wednesday (2/11).

Sincerely,

Jane Roschen (she/her)
Senior Regulatory Analyst | Energy Infrastructure Branch
Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue, San Francisco, CA 94102
jane.roschen@cpuc.ca.gov | (415) 703-1969
publicadvocates.cpuc.ca.gov



From: Brenc, William (Law) <W2BM@pge.com>

Sent: Wednesday, February 4, 2026 12:40 PM

To: Katy Morsony <katy@cal-cca.org>; Roschen, Jane <Jane.Roschen@cpuc.ca.gov>; Jerri Strickland <jstrickland@3ce.org>; Jeremy Waen <jwaen@peninsulacleanenergy.com>; Maren Wenzel <maren.wenzel@svcleanenergy.org>; Akiya, Kimiko <Kimiko.Akiya@cpuc.ca.gov>; Seth.Hilton@stoel.com; ETorres@turn.org; John Newton <jnewton@avaenergy.org>; Sabrinna Soldavini <ssoldavini@mcecleanenergy.org>; Faith Carlson <fcarlson@redwoodenergy.org>; blaising@braunlegal.com; RegRelCPUCCases <RegRelCPUCCases@pge.com>; Klatt@EnergyAttorney.com; Jennifer Baak <jennifer@cal-cca.org>; Leanne Bober <leanne@cal-cca.org>; CalCCA Regulatory <regulatory@cal-cca.org>; Meghan.OBrien@Stoel.com; Christa.Lim@shell.com; cfaber@sdge.com; ZBranum@sdge.com; RKoss@AdamsBroadwell.com; Lilly.McKenna@Stoel.com; Cragg, Brian <bcragg@downeybrand.com>; NSheriff@Buchalter.com; SHafez@Buchalter.com; Dauler, Heather <heather.dauler@sanjoseca.gov>; 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 <Martin.McCormack@cpuc.ca.gov>; Peck, David B. <david.peck@cpuc.ca.gov>; Rodriguez, Emil <Emil.Rodriguez@cpuc.ca.gov>; Dersch, Rachel <Rachel.Dersch@cpuc.ca.gov>; Hogan, Christopher <Christopher.Hogan@cpuc.ca.gov>; Khoe, Richard <Richard.Khoe@cpuc.ca.gov>; Lyser, Shelly <Shelly.Lyser@cpuc.ca.gov>; Bone, Traci <traci.bone@cpuc.ca.gov>; Ornelas, Karen Khamou <K1K3@pge.com>; Soto, Adam <A8S6@pge.com>; Pierson, Sharon <SGT2@pge.com>; Moffat, Ben <B3MJ@pge.com>; Rogers, Sienna <Sienna.Rogers@pge-corp.com>; Batten, Natasha <NDBA@pge.com>; Raman, Divya

<D3R7@pge.com>; Brenc, William (Law) <W2BM@pge.com>; cathy@barkovichandyap.com; Catherine Yap <ceyap2@sonic.net>; Kwatra, Sanya <Sanya.Kwatra@cpuc.ca.gov>; Toy, Deanna <DCT4@pge.com>; Middlekauff, Charles (Law) <CRMd@pge.com>

Subject: [EXTERNAL] PG&E Electric Rule 30 - Motion for Leave to Submit Supplemental Testimony

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
Pacific Gas and Electric Company
william.brenc@pge.com
(925) 204-4952

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

ATTACHMENT B

Brenc, William (Law)

From: Middlekauff, Charles (Law)
Sent: Wednesday, February 11, 2026 12:40 PM
To: Akiya, Kimiko; McCormack, Martin; Peck, David B.; Elise Torres; Brenc, William (Law); Sheriff, Nora; Leanne Bober; Katy Morsony
Cc: Toy, Deanna; Middlekauff, Charles (Law)
Subject: RE: IMPORTANT: Electric Rule 30 - Proposed Schedule revision

Correction, I meant parties don't have to respond to PG&E's additional testimony until April 8.

E-mail below corrected.

Charles

From: Middlekauff, Charles (Law) <CRMd@pge.com>
Sent: Wednesday, February 11, 2026 12:36 PM
To: Akiya, Kimiko <kimiko.akiya@cpuc.ca.gov>; McCormack, Martin <martin.mccormack@cpuc.ca.gov>; Peck, David B. <david.peck@cpuc.ca.gov>; Elise Torres <etorres@turn.org>; Brenc, William (Law) <W2BM@pge.com>; Sheriff, Nora <nsheriff@buchalter.com>; Leanne Bober <leanne@cal-cca.org>; Katy Morsony <katy@cal-cca.org>
Cc: Middlekauff, Charles (Law) <CRMd@pge.com>; Toy, Deanna <DCT4@pge.com>
Subject: IMPORTANT: Electric Rule 30 - Proposed Schedule revision
Importance: High

All:

Following up on our call with Cal Advocates. We would propose sending an e-mail to Judge Toy requesting jointly on behalf of the parties requesting that the following schedule be adopted for the proceeding:

Proposed Revised Schedule:

- 2/13 – PG&E Files Motion for Leave to File Additional Testimony and includes Additional Testimony with the motion
- 3/13 – Parties file initial testimony regarding ALJ Questions
- 4/8 – Parties file rebuttal testimony on ALJ Questions and testimony regarding PG&E's Additional Testimony
- 4/17 – Decision on evidentiary hearings
- 4/24 – Evidentiary hearings (if needed)
- 5/8 – Opening Brief on ALJ Questions and PG&E Additional Testimony
- 5/22 – Reply Briefs on all issues

This schedule is based on the exact same amount of days between events except that it extends the schedule to allow PG&E to file its motion asking for leave to file Additional Testimony. Parties will not have to file any testimony in response to PG&E's additional testimony for a little less than two months (i.e., parties don't have to address the additional testimony until April 8). PG&E will waive its right to file rebuttal regarding the Additional Testimony (but will file rebuttal testimony on the ALJ Questions).

We look forward to your response and happy to provide any clarifying information or hop on a quick call to provide more details.

Willie and Charles