



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

FILED

02/26/26

04:59 PM

R2401018

Order Instituting Rulemaking to Establish
Energization Timelines.

Rulemaking 24-01-018
(Filed January 25, 2024)

**JOINT MOTION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39-E), SAN
DIEGO GAS & ELECTRIC COMPANY (U 902-E), AND SOUTHERN CALIFORNIA
EDISON COMPANY (U 338-E) SEEKING AUTHORIZATION TO ESTABLISH
MEMORANDUM ACCOUNTS TO TRACK THE COSTS TO SUPPORT THE
COMMISSION'S ENERGY DIVISION IN ANALYZING ENERGIZATION DATA
PURSUANT TO D.24-09-020**

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Dated: February 26, 2026

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I. INTRODUCTION

Pursuant to Rule 11.1 of the California Public Utilities Commission’s (“Commission” or “CPUC”) Rules of Practice and Procedure, Pacific Gas and Electric Company (“PG&E”), San Diego Gas & Electric Company (“SDG&E”), and Southern California Edison Company (“SCE”) (collectively “IOUs”) hereby jointly file this motion¹ requesting authority to establish respective memorandum accounts to track the IOUs’ respective costs associated with a contract² to support the Commission’s Energy Division (“ED”) in analyzing energization data reported by the IOUs in the above-captioned proceeding (“Joint Motion”).

II. THE COMMISSION SPECIFICALLY DIRECTED THE IOUS IN D.24-09-020 TO ESTABLISH MEMORANDUM ACCOUNTS AND TO FILE THIS MOTION

The IOUs submit this Joint Motion in compliance with Decision (“D.”) 24-09-020 (the “Decision”), Ordering Paragraph (“OP”) 16, which states:

[The IOUs] must jointly fund \$1 million per year over five years, for a total of \$5 million dollars, to support the improvement of the California Public Utilities Commission’s Energy Division’s ability to analyze, collect, track and report the large electric IOUs’ data to

¹ Pursuant to Rule 1.8(d), counsel for PG&E certifies that he has been fully authorized by counsel for SDG&E and SCE to submit this joint motion on their behalf.

² The Decision authorizes the Commission’s Executive Director to enter a contract to support ED’s energization data analysis and to recover the cost via reimbursement from PG&E, SCE, and SDG&E. D.24-09-020 at 60.

the public. The respective annual share of this fund from each large electric IOU shall be based off its respective percentage of California-jurisdictional electric revenues as of the issuance date of this decision.

The Decision further clarifies:

To support the improvement of Energy Division’s ability to analyze, collect, track, evaluate and report the large electric IOU biannual energization data and progress toward meeting the targets adopted in Section 7 of this decision, Energization Targets, and Section 8 of this decision, Upstream Capacity Upgrade Targets, to the general public, we authorize the Commission’s Executive Director to enter into a contract of \$1 million per year over five years, or \$5 million total over five years, and recover the cost via reimbursement from PG&E, SCE, and SDG&E based on their respective share of their California jurisdictional annual electric sales as of the issuance date of this decision. Funding for the Commission-managed evaluation budget will be sought pursuant to the California Legislature’s Annual Budget Act, which gives the Commission certain specific and limited ongoing reimbursable expenditure authority.

To track the costs associated with the contract described above, PG&E, SCE, and SDG&E are directed to file motions in this proceeding requesting authority to establish memorandum accounts specifically associated with the contract to support Energy Division in analyzing []energization data collected through the template to be developed in compliance with this decision. The costs tracked in each large electric IOU’s separate memorandum accounts cannot be recovered from ratepayers until the costs are reviewed and approved by the Commission in a ratesetting proceeding.³

Although the IOUs do not have any insight at this time into the status of the Executive Director’s efforts “to enter into a contract of \$1 million per year over five years” upon establishment of the IOUs’ memorandum accounts for this purpose, the Executive Director and/or ED can begin billing the IOUs for the Commission’s costs of such contract. The contract reimbursement costs will be recorded in the IOUs’ respective memorandum accounts in proportion to each IOU’s annual share of California-jurisdictional electric revenues.

³ D.24-09-020 at 60-61.

The IOUs further note some ambiguity in the Decision’s reference to “the Commission-managed evaluation budget [that] will be sought pursuant to the California Legislature’s Annual Budget Act.”⁴ The IOUs would appreciate clarification from the Commission as to whether the budget of \$1 million/year over 5 years totaling \$5 million to reimburse ED’s contracting costs that will be recorded in the IOUs’ memorandum accounts is the same as or separate from the “Commission-managed evaluation budget” that will be sought from the Legislature pursuant to the California Legislature’s Annual Budget Act.

III. D.24-09-020 DIRECTS THE IOUS TO RECORD ED’S CONTRACTING COSTS IN THEIR RESPECTIVE MEMORANDUM ACCOUNTS BASED ON THEIR RESPECTIVE ANNUAL SHARE OF CALIFORNIA-JURISDICTIONAL ELECTRIC REVENUES AS OF THE ISSUANCE DATE OF THE DECISION

The Decision mandates that “[t]he respective annual share of this fund from each large electric IOU shall be based off its respective percentage of California-jurisdictional electric revenues as of the issuance date of this decision.”⁵ Accordingly, the respective shares of California-jurisdictional electric revenues for each IOU, as of the issuance date of D.24-09-020 (September 17, 2024), are shown in Table 1 below. These percentages are based on 2023 jurisdictional revenues reported in each IOU’s FERC Form 1 (Electric).

Table 1	
2023 Jurisdictional Electric Revenues (FERC Form 1)	
Utility	Allocation
Pacific Gas and Electric Company	46.82501%
Southern California Edison Company	47.55648%
San Diego Gas & Electric Company	5.61850%

Upon approval of this Joint Motion, the IOUs would submit Tier 1 advice letters to establish their respective memorandum accounts with effective dates upon submittal.

⁴ *Id.*

⁵ *Id.* at Ordering Paragraph 16.

IV. CONCLUSION

For the foregoing reasons, the IOUs respectfully request that the Commission grant the Joint Motion and authorize the IOUs to establish memorandum accounts as described above and in the Decision.

Respectfully Submitted,
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