

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED

04/17/26

04:11 PM

A2505009

Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2027. (U 39 M)

Application 25-05-009

**THE PUBLIC ADVOCATES OFFICE
NOTICE OF EX PARTE MEETING**

Pursuant to Rule 8.2 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) hereby provides notice that an ex parte meeting was held with President John Reynolds' advisors Drew Hodel, Syche Che, and Justin Galle.

The meeting took place via Webex on Tuesday, April 14, 2026, at 1 p.m. and lasted until approximately 1:30 p.m. Tamera Godfrey, Program Manager; Dao Phan, Program & Project Supervisor; Ry Andresen, Regulatory Analyst; and Selina Shek, Attorney, attended for Cal Advocates.

During the meeting, Cal Advocates noted that: (1) Pacific Gas & Electric's (PG&E) 2027 General Rate Case (GRC) proposes significant revenues increases, and (2) there are outstanding costs and balances that PG&E has not requested yet and will likely request by 2030. These issues raise serious affordability concerns for PG&E's ratepayers.

While the GRC process maintains intended incentives for cost discipline, PG&E's increasing reliance on memo accounts for recovery of routine costs is a substantial contributor to rate increases outside of the GRC. Cal Advocates noted its appreciation of President Reynolds' Amended Scoping Memo and Ruling questioning whether the Wildfire Mitigation Plan Memorandum Account (WMPMA) or the Fire Risk Mitigation

Memorandum Account (FRMMA) should continue to be tracked and recovered outside of the GRC process. President Reynolds' Amended Scoping Memo and Ruling brings to the forefront concern over substantial rate increases occurring outside the GRC process. The FRMMA and WMPMA are no longer necessary to track costs outside of the GRC process. Continued use of the wildfire mitigation memorandum accounts places undue risks on ratepayers by undermining the budget setting function of the GRC.¹

Cal Advocates stated that PG&E's growing reliance on memorandum accounts for routine and forecasted costs undermines the GRC framework.² PG&E's continued liberal use of memorandum accounts reduces incentives for cost control and shifts risk to ratepayers. This is why wildfire mitigation costs should be recovered solely through the GRC process.

When PG&E began using the FRMMA and WMPMA to track wildfire mitigation costs in 2019, the costs were uncertain and not yet forecasted in the GRC.³ This is no longer the case. PG&E has forecasted wildfire mitigation costs in its 2020 GRC, its 2023 GRC, and now in its 2027 GRC. These activities are now routine and recurring and their costs should be planned and managed within the GRC budget, not recovered through memorandum accounts.

Lastly, Cal Advocates added that PG&E's GRC provides PG&E the opportunity to reallocate funding, reprioritize activities, and respond to changing conditions within its adopted revenue requirement, and that PG&E already demonstrates this flexibility through over- and under-spending across its wildfire mitigation activities.

¹ Ex. CA-29, p. 1.

² Ex. CA-29, p. 1.

³ Ex. CA-29, p. 7.

Cal Advocates provided a link to Cal Advocates' fact sheet on its website that the advisors requested. See Attachment A.

Respectfully submitted,

/s/ Selina Shek
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Attorney

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April 17, 2026

ATTACHMENT A

From: [Andresen, Ry](#)
To: [Provencio, Joe](#); [Shek, Selina](#)
Subject: Fw: Cal Advocates" Fact Sheet on PG&E"s 2027 GRC
Date: Friday, April 17, 2026 12:22:10 PM

From: Andresen, Ry <Ry.Andresen@cpuc.ca.gov>
Sent: Tuesday, April 14, 2026 2:13 PM
To: Cai, Syche <Syche.Cai@cpuc.ca.gov>; Galle, Justin <Justin.Galle@cpuc.ca.gov>; Hodel, Drew <Drew.Hodel@cpuc.ca.gov>
Cc: Shek, Selina <selina.shek@cpuc.ca.gov>
Subject: Cal Advocates' Fact Sheet on PG&E's 2027 GRC

Hi Syche, Justin, and Drew,

Thanks for meeting with us this afternoon. [Here is the link](#) to the fact sheet that we referenced.

Best,

Ry Andresen | (they/them/theirs) [Why I list my pronouns](#)

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