



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

**FILED**

05/18/26

04:59 PM

**K2605011**

**APPEAL OF**

**United Energy Trading, LLC d/b/a**

**Collective Energy From Citation No. UEB-**

**003-0645 in the Amount of \$1,000.00 Issued**

**By The Consumer Protection And**

**Enforcement Division**

**NOTICE OF APPEAL**

United Energy Trading, LLC d/b/a Collective Energy (UET), respectfully appeals Citation No. UEB-003-0645 (the Citation), issued on April 15, 2024, in the amount of \$1,000.00, and requests termination of the expedited procedures. As grounds for this appeal, UET states as follows:

1. UET is a Core Transport Agent, providing gas commodity services to residential customers in Northern California.

2. On October 28, 2024, UET telephoned D\*\*\*\* M\*\*\*\*\*, who had opted-in to receive a sales call. Mr. M\*\*\*\*\* had listed his name and phone number and provided an address of 4\*\*\*\* E\*\*\* \*\*\*\*\* in Carmichael, California.

3. During the sales call, Mr. M\*\*\*\*\* stated that he was watching a game on the television and left to locate the energy statement for PG&E. On his return, he provided the

address's SAID number and appeared to be reading other information from the energy statement.

4. He also stated that he was not the account holder but stated that he was the account holder's boyfriend or husband: "No, it's under my girlfriend ... wife." Another person, a female, can be heard in the background, perhaps discussing household items with Mr. M\*\*\*\*\*.

5. Mr. M\*\*\*\*\*, also apparently reading from the energy statement, gave the E\*\*\*\* address. After Mr. M\*\*\*\*\* advised that the account was held by J\*\*\*\*\* W\*\*\*\*\*, the sales agent confirmed that Mr. M\*\*\*\*\* was legally authorized to enroll the account.

6. UET obtained the Third Party Verification (TPV) at 6:13 PM that day. When asked for his name, Mr. M\*\*\*\*\* said, "David M\*\*\*\*\*, live here." He then confirmed the account number and affirmed that he was a person legally authorized to enroll the account in the core gas aggregation program. Mr. M\*\*\*\*\* provided his own email address.

7. UET also provided its standard Terms and Conditions, which were sent to (916) \*\*\*-\*\*\*\*; on information and belief, this number belongs to Jennifer W\*\*\*\*\*. UET's records show that its Terms and Conditions transmitted successfully (meaning, Ms. W\*\*\*\*\* received them).

8. On November 4, 2024, UET submitted the enrollment to PG&E and, on November 25, 2024, PG&E switched the account to UET's gas program.

9. On December 28, 2024, PG&E issued the first energy statement that included UET's charges.

10. According to the Citation, Ms. W\*\*\*\*\* called the CPUC Consumer Affairs Branch (CAB) on December 9, 2025, alleging enrollment without her authorization.

11. Again according to the Citation, on January 14, 2026, CPUC's Consumer Protection and Enforcement Division's (CPED) Utilities Enforcement Branch (UEB) staff issued data request DR-CTA-00667-1 to UET requesting proof of customer enrollment authorization Ms.

Jennifer W\*\*\*\*\*, which UET provided on January 29, 2026.

12. On February 12, 2025, nearly two months after her call to CAB, Ms. W\*\*\*\*\*, called UET to cancel service, stating that a “friend” had changed her gas service. She also requested a copy of the TPV, which UET provided (a second time) on or about February 28, 2025.

13. Meanwhile, CPED prepared and presented to Ms. W\*\*\*\*\* a declaration in which she attests that the voices on the TPV are not hers nor any member of her household, and that neither she nor any member of her household ordered or authorized Core Transport Agent service from UET. On information and belief, Ms. W\*\*\*\*\* did not write the declaration nor dictate its contents. Ms. W\*\*\*\*\* signed the declaration.

14. The Citation indicates that Ms. W\*\*\*\*\* admitted knowing Mr. M\*\*\*\*\* but that she told CPED he “does not reside at the service address and does not have authorization to switch service on her behalf.” The Citation does not state how Ms. W\*\*\*\*\* knows Mr. M\*\*\*\*\*, whether he lived with her at the service address at the time of enrollment, or how he obtained information found only in her energy statement, ostensibly something only household members would know.

15. CPED sought no other information from UET which might confirm the accuracy of the enrollment.

16. On April 15, 2024, CPED cited UET for failing to provide a valid proof of enrollment, noting the differences in voices, names, and email addresses.

17. UET, accordingly, respectfully appeals Citation No. UEB-003-0645 as follows:

- CPED erred in concluding that UET did not obtain a compliant TPV;
- CPED failed to conduct an appropriate investigation prior to issuing the citation;
- CPED erred in failing to consider all the facts before issuing the Citation;

- CPED erred in preparing and presenting the declaration, exceeding the division's investigatory authority;
- Ms. W\*\*\*\*\*'s declaration lacks credibility based on all the evidence, and the CPED therefore erred in relying on it.

For all these reasons, United Energy Trading d/b/a Collective Energy timely submits this appeal and asks the Commission to overturn the Citation.

Respectfully Submitted,

By: /s/ Leah E. Capritta  
Leah E. Capritta

Buchalter LLC  
1099 18th Street, Suite 1900  
Denver, Colorado 80202-1905  
Main: (303) 253-6740  
Direct: (303) 927-3041  
Email: [lcapritta@buchalter.com](mailto:lcapritta@buchalter.com)

*Counsel for Defendant United Energy Trading d/b/a  
Collective*

Dated: May 15, 2026