FILED
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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Andrew Browning, Complainant, vs. Pacific Gas and Electric Company (U39E), Defendant.	Case (C.) _____

Expedited Complaint
(Rule 4.6)

COMPLAINANT	DEFENDANT
Andrew Browning 987 Cragmont Avenue Berkeley CA 94708 T: 774-454-7266 Email: abrowning@faceco.net	Pacific Gas and Electric Company (U39E) Attn: Cliff Gleicher, Managing Counsel 300 Lakeside Drive Oakland CA 94612 T1: 415-971-2678 Email1: Cliff.Gleicher@pge.com Email2: pgetariffs@pge.com

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

(A) Andrew Browning

COMPLAINANT(S)

vs.

(B) PG&E

DEFENDANT(S)
(Include Utility "U-Number," if known)

(for Commission use only)

(C)

Have you tried to resolve this matter informally with the Commission's Consumer Affairs staff?
☒ YES ☐ NO

Has staff responded to your complaint?
☒ YES ☐ NO

Did you appeal to the Consumer Affairs Manager?
☐ YES ☒ NO

Do you have money on deposit with the Commission?
☐ YES ☒ NO
Amount $_____

Is your service now disconnected?
☐ YES ☒ NO

COMPLAINT

(D)

The complaint of (Provide name, address and phone number for each complainant)

Name of Complainant(s)	Address	Daytime Phone Number
Andrew Browning	987 Cragmont Ave, Berkeley CA 94708	774-454-7266

respectfully shows that:

(E)

Defendant(s) (Provide name, address and phone number for each defendant)

Name of Defendant(s)	Address	Daytime Phone Number
PG&E	BOX 997300	1 (800) 660-6789
	SACRAMENTO, CA 95899-7300	

(F)
Explain fully and clearly the details of your complaint. (Attach additional pages if necessary and any supporting documentation)

Please see addendum at the end of this document.

(G) Scoping Memo Information (Rule 4.2[a])

(1) The proposed category for the Complaint is (check one):
☒ adjudicatory (most complaints are adjudicatory unless they challenge the reasonableness of rates)
☐ ratesetting (check this box if your complaint challenges the reasonableness of rates pursuant to Rule 4.1(b))

(2) Are hearings needed (are there facts in dispute)? ☒ YES ☐ NO

(3) ☐ Regular Complaint ☒ Expedited Complaint (Rule 4.6)

(4) The issues to be considered are
(Example: The utility should refund the overbilled amount of $78.00):

1. Whether PG&E has done engineering work not supported by fact. If not, please return the engineering deposit paid. I do not believe I should pay for engineering work not supported by fact.

2. Whether or not the property's electrical service was, at the time of construction (c. 1980), 150A. If so, allow me to submit a new application with a new engineering deposit for a 150A like-for-like panel replacement using a Seimens MM0202B1150 panel.

This request is technical in nature. See addendum for details.

(5) The proposed schedule for resolving the complaint within 12 months (if categorized as adjudicatory) or 18 months (if categorized as ratesetting) is as follows:

Prehearing Conference: Approximately 30 to 40 days from the date of filing of the Complaint.
Hearing: Approximately 50 to 70 days from the date of filing of the Complaint.

Prehearing Conference (Example: 6/1/09): June 3 2026
Hearing (Example: 7/1/09): July 1 2026

Explain here if you propose a schedule different from the above guidelines.

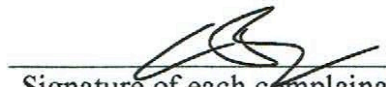
(H)
Wherefore, complainant(s) request(s) an order: State clearly the exact relief desired. (Attach additional pages if necessary)

1. A refund of the $3500 engineering deposit made against project P000460576.
2. An explicit agreement on PG&E letterhead that the circa-1980 as-built electrical service is 150A.
3. Pursuant to the 150A agreement, an opportunity to submit a new like-for-like replacement application with a new engineering deposit using the aformentioned MM0202B1150 main service panel.

(I)
OPTIONAL: I/we would like to receive the answer and other filings of the defendant(s) and information and notices from the Commission by electronic mail (e-mail). My/our e-mail address(es) is/are:

abrowning@faceco.net

(J)
Dated Berkeley (City), California, this 1 (date) day of May (month), 2026 (year)



Signature of each complainant

(MUST ALSO SIGN VERIFICATION AND PRIVACY NOTICE)

(K)

REPRESENTATIVE'S INFORMATION:
Provide name, address, telephone number, e-mail address (if consents to notifications by e-mail), and signature of representative, if any.

Name of Representative: _____

Address: _____

Telephone Number: _____

E-mail: _____

Signature: _____

VERIFICATION
(For Individual or Partnerships)

I am (one of) the complainant(s) in the above-entitled matter; the statements in the foregoing document are true of my knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

(L)
Executed on 5/1/2026 (date), at Berkeley (City), California

(Complainant Signature)

VERIFICATION
(For a Corporation)

I am an officer of the complaining corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

(M)
Executed on _____ (date), at _____ (City), California

Signature of Officer

Title

(N) NUMBER OF COPIES NEEDED FOR FILING:
If you are filing your formal complaint on paper, then submit one (1) original, six (6) copies, plus one (1) copy for each named defendant. For example, if your formal complaint has one (1) defendant, then you must submit a total of eight (8) copies.

If you are filing your formal complaint electronically (visit http://www.cpuc.ca.gov/PUC/efiling for additional details), then you are not required to mail paper copies.

(O) Mail paper copies to:
California Public Utilities Commission
Attn: Docket Office
505 Van Ness Avenue, Room 2001
San Francisco, CA 94102

PRIVACY NOTICE

This message is to inform you that the Docket Office of the California Public Utilities Commission ("CPUC") intends to file the above-referenced Formal Complaint electronically instead of in paper form as it was submitted.

Please Note: Whether or not your Formal Complaint is filed in paper form or electronically, Formal Complaints filed with the CPUC become a **public record** and may be posted on the CPUC's website. Therefore, any information you provide in the Formal Complaint, including, but not limited to, your name, address, city, state, zip code, telephone number, E-mail address and the facts of your case may be available online for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced complaint.

Signature

May 1 2026

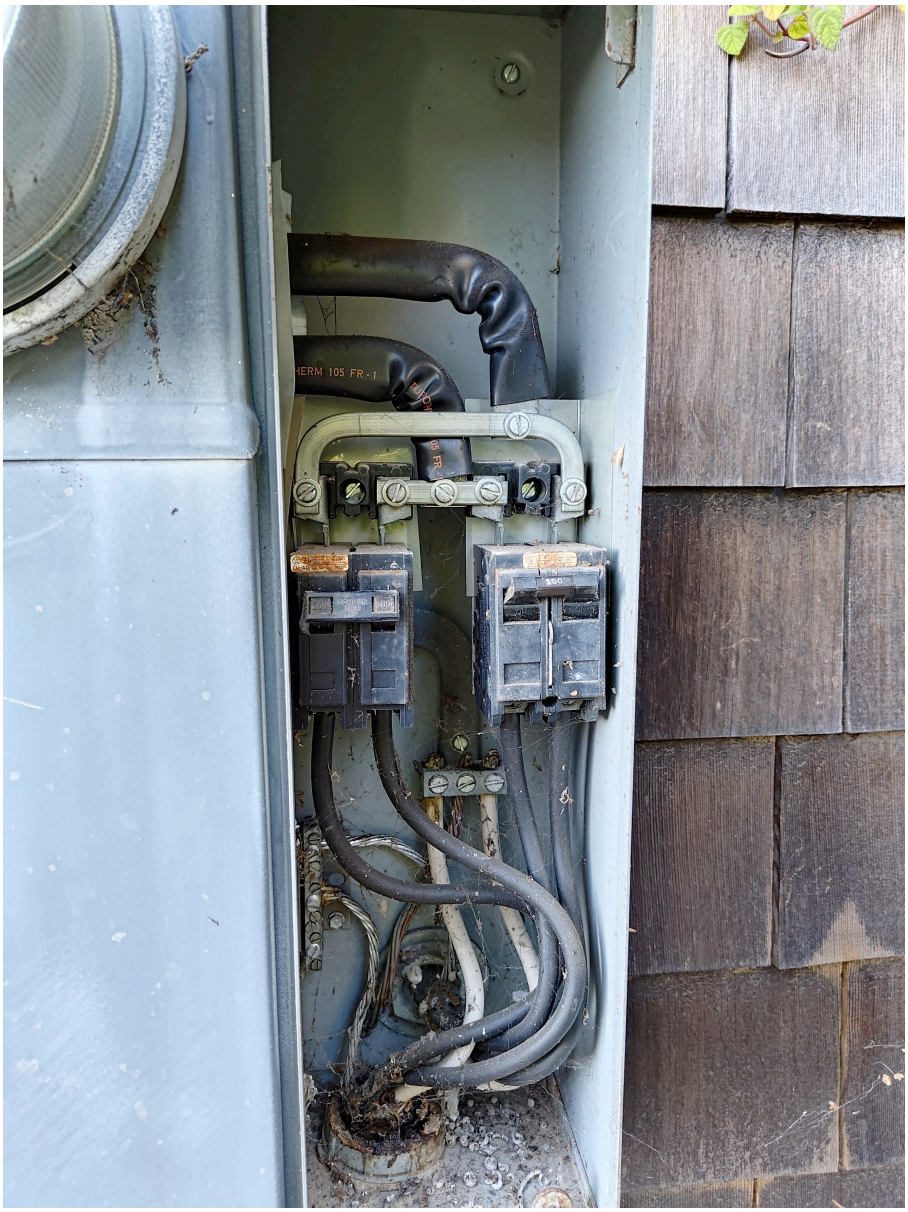
Date

Andrew Browning

Print your name

Background:

1. I intend to install battery storage and solar PV on my property.
2. The property has two independent structures, the Garage and the House.
3. The original electrical service had a single meter with two 100A main disconnects, one servicing the Garage and one servicing the House.
4. Due to the multiple main disconnects, it would be impossible to install battery storage that would service the Garage and House in the event of a grid outage.
5. The original electrical service entrance panel did not have any identifying marks as the equipment was old and in poor condition. See photo below.
6. Due to the condition of the existing panel and existence of multiple disconnects there was no way to identify the size of the incoming service.
7. Gas service was shut off in early 2025 and the abandoned pipework is in the process of being removed by PG&E.

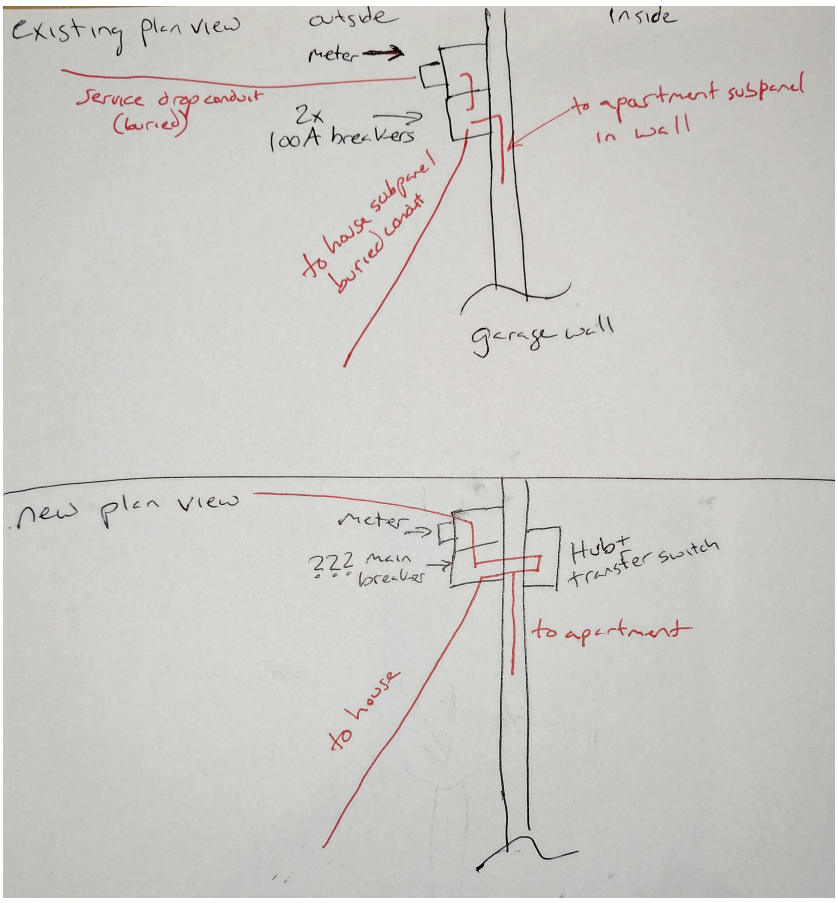


Original service entrance panel. Additional photos available.

Initial contract work:

1. Due to the nature of the existing service configuration, and the plans for installing battery storage, I hired a licensed electrician to re-configure the service entrance to have a single main disconnect and a sub-panel which would ultimately contain the House and Garage breakers, microgrid interconnection device, solar PV and inverter tie-ins, etc.
2. The electrician was contacted in April of 2025
3. Due to the lack of documentation I did not instruct the electrician on what size panel/ breaker/etc to use in the new main service panel. I specifically requested an appropriately sized panel/breaker to use **the existing service**. See quote and sketch below.

   "*I don't know if the service is actually 200A or something smaller (125? 150? it was built in 1979/1980),* ***so whatever main breaker would be appropriate for the existing service.***"



Original instruction transmitted to electrician

4. As I am not an electrician, I was not aware at this time of PG&E's unusual position that the *Main Panel Rating* is the size listed on the box, rather than the size of the single main disconnect. This is a deviation from the NEC, which is something I am relatively familiar with. At this point I had no way of knowing that the electrician was about to make a mistake due to this and had no way to anticipate the resulting problems.
5. I ensured that the electrician intended to do all of the appropriate steps to accomplish this with permits and in conjunction with PG&E. Because I am not an electrician, I had no way

of evaluating whether the work was being done using standard practices or procedures. I had to trust the licensed electrician to do the necessary work. I believe this is normal when hiring licensed professionals, as that is the purpose of licensing requirements.

6. At the end of June 2025 the electrician and I exchanged communications regarding the permitting process, and I transmitted the information requested for the local permits and PG&E shutoff request.
7. At the beginning of September the electrician stated they could do the work and PG&E would finish their portion of the work later. I had no reason to believe this was incorrect as the electrician had, to this point, been thorough and communicative.
8. The electrician installed a Seimens MM0202B1200 panel with a 125A breaker in September 2025, and remained communicative while having the work inspected by the AHJ and PG&E.
9. The 125A breaker was the electrician's best guess of the existing service size.
10. The application was for a 125A to 125A like-for-like panel replacement.

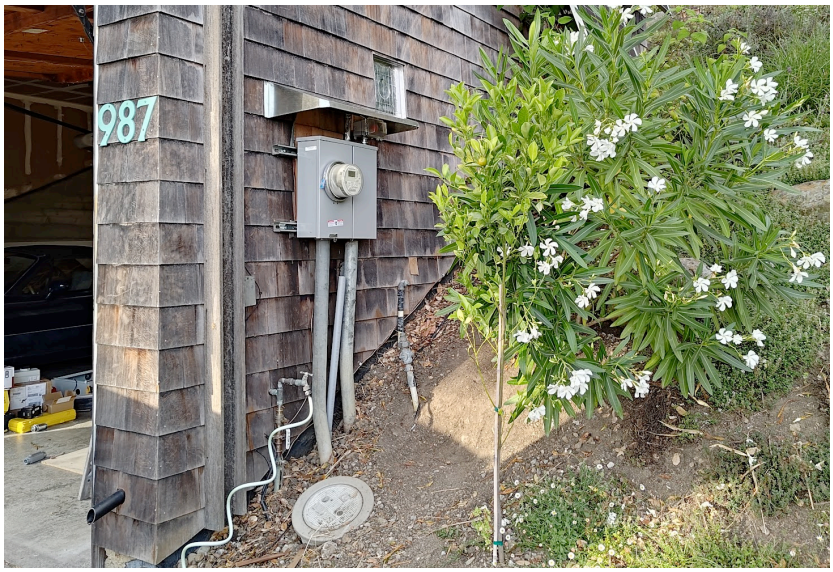
At this point I believe I have shown that I made a clear and genuine attempt to accomplish a re-configuration of the service entrance panel within the technical constraints of the existing service provided by PG&E, with the goal of updating the electrical system of my home to be BESS-ready. This is both a personal goal of mine and a general goal of the State of California, and I was operating with genuine intent to further those goals safely and within the confines of law and engineering within my capacity as a homeowner and as an individual without an electrician's license.

At this point I believe the work that was done is a significant improvement to the previous condition, both in utility and in general condition. A list of improvements below:

- BESS readiness
- Improved physical condition of the panel and breakers.
- improved environmental protection (installation included a rain shield).
- Improved total protection from 200A to 125A. (Not required by NEC, but fundamentally represents a stricter protection of the feeders by the single 125A breaker rather than a total of 200A comprised of parallel 100A breakers).

At this point I believe I have made a clear and genuine improvement to the overall service entrance equipment and believe it has been done with the correct permitting and coordination with PG&E.

At this point I had no reason to believe there is conflict with PG&E, or that any unusual practices had been used to perform the work. Everything at this point seemed to match my understanding of the NEC as a non-expert. I had no reason to believe this was an "upgrade" vs a "like-for-like" replacement.



New panel as installed.

PG&E response:

1. During inspection, a PG&E representative identified that the *box* used was rated for 200A. Due to a PG&E local rule, this is used as the "panel rating". Until this point, I was unaware of this rule as it is a departure from the conventional NEC which uses the rating of a single main-disconnect as the service panel rating. It took a while for PG&E to point me to this regulation, stating that the documentation was "internal PG&E documentation" and that it was not meant for distribution. That said, I accept that this is the case and am not debating this fact. For the purposes of this exercise I agree that the main service panel rating is the rating of the box.

——————> **This is where PG&E goes off the rails.**

2. On Jan 29 2025 I received notice from my electrician that PG&E would not accept the panel configuration due to the 200A rating, and proposed two options:
    1. Upgrade the service entrance to 200A, involving ripping up the road and re-trenching new conduit and feeders.
    2. Revert to a **100A** panel.

    Concurrently, I received a proposal from PG&E with a $30,000 estimate for the upgrade work. This caused me to request a stop to all further work and requested to be put in touch with PG&E directly because it seemed obvious to me that some wires were crossed.

    I want to clarify that up to now I was trusting the professionals involved, and the upcoming communications with PG&E required a *lot* of back-and-forth to extract any kind of information from PG&E regarding PG&E's requirements. I did not feel that PG&E was making an honest attempt to engage with me regarding this project and the problems it had.

    During these communications I investigated the reasoning behind the two options presented. **For brevity, my complaint is with the second one (revert to previous service rating) and that is the main question I would like CPUC to adjudicate.** That said, when justifying the work required for the first option (a service upgrade, which I don't want but was in the unenviable position of needing to consider), PG&E continually provided incorrect information. Some examples:
    - A requirement for 3" conduit at 200A. This comes from the requirements for new services. There is a separate category "replacements or upgrades" in which the existing 2" conduit would be acceptable. (table 1, page 4, METHODS AND REQUIREMENTS FOR INSTALLING RESIDENTIAL UNDERGROUND ELECTRIC SERVICES 0 – 600 V TO CUSTOMER-OWNED FACILITIES)
    - A requirement for certain clearances from gas and other equipment. Again, PG&E was applying new-work requirements when the greenbook has a clear distinction between new work and "replacements or upgrades" which are substantially less onerous. (2.4.2 Section E, Greenbook 2023)
    - A requirement for clearances from gas specifically, even though PG&E knew there was a work order in place to remove the gas equipment.

    This did not feel like a genuine attempt to engage with me or with the relevant code.

3. During a phone call on Jan30 and reaffirmed in a followup email, I asked for documentation regarding the assertion that the previous panel was 100A. I was told that the figure came from an EV load evaluation form that I, the homeowner, had filled out in years prior.

A note about this: The service feeders and conduit are owned by, operated by, and maintained by PG&E. It is my position that a homeowner attestation is not a valid source of information regarding the size of the existing service. That said, if for some reason I am the arbiter of service capacity then please let me know and I will simply *declare* that the service size is whatever value is convenient to me.

Since this is obviously not a practical way to operate a power distribution system, I asked for additional documentation that originated from PG&E. This request was rebuked *repeatedly*. PG&E did not appear to have any intention of originating any documentation backing their claim.

It is critical to understand the existing service size when evaluating a panel upgrade or replacement. Without this, I cannot commit to reverting the panel because I have no documentation about what size panel a reversion would require. I am fully on-board with a reversion to correct the issue, but *must* have documentation of the service size to do so.

4. Due to the unofficial nature of the documentation being used to set the previous service at 100A, I again requested that all further work be stopped immediately, and that a technician be sent out to evaluate the size of existing service feeders. I requested three things:
    1. The size and material of the existing service feeders
    2. The methodology PG&E uses to determine feeder ampacity
    3. The ampacity of the feeders, as calculated using PG&E methodology

5. Endless back-and-forth occurs here, during which various claims of service size are made based on some combination of the following:
    1. My attestation (100A)
    2. The electrician's guess (125A)
    3. The service sizes available for new construction (100A, 125A)

6. During this time, repeated requests for documentation regarding the existing feeders are rebuked or ignored. On or around Feb 18 2026 a claim is made by Phillip Rocha that there are photos of the existing feeders and documentation of them, but when I asked for these to be produced I was told "sure, hang on" followed by silence and then "I'll get back to you on that". I believe this specific instance was a straight-up lie. No evidence was forthcoming from this interaction.
7. On March 12 2026 I received a notice from Phillip that a PG&E technician had been dispatched to the location to document the service feeders, in contradiction to his previous statement that this had already been done.
8. Several emails are required to extract the full story from Phillip, but the end result is this information:
    1. The service feeders are 1/0 Copper
    2. 1/0 Copper in underground conduit is acceptable for 150A service

    Note: 1/0Cu is good for 175A under NEC rules, so this is not a case of "just barely".

9. On March 12 2026 Phillip stated that he understood my position, and that a 150A panel would be accepted as a "like for like" replacement.

    "Sorry I misread your email. I understand your stance. And that goes in line that if you put it back say 150 amps, we will do a disconnect/ Reconnect. And the contractor and put back the equivalent of 150amps. We will leave it as such as a like for like."
10. Per this determination, on March 12 I requested that PG&E evaluate the Siemens MM0202B1150 panel for use on 150A service. This is the 150A version of the 200A panel installed by the electrician, and represents the lowest-risk option for reverting the service and being accepted as a like-for-like replacement.

11. On March 25 2026, the panel is refused because new electrical service is not available in 125A.
12. At this point, I believe all productive communication has stopped.

In summation:

1. The wrong panel was installed - 200A was not appropriate. I am not denying this fact.
2. A reversion to previous is acceptable to PG&E.
3. “Previous” is not known, but a PG&E representative agrees that 150A is correct based on existing conditions.
4. All the engineering work done by PG&E was not based on any actual documentation of what “previous” was, and was therefore invalid. You can’t do engineering if the base facts are unknown.
5. Since the previous engineering work was not based on facts, I would like the full engineering deposit returned.
6. Now that there is agreement on the size of the service, I would like the opportunity to reset the clock and submit a new application with a new engineering deposit for a 150A like-for-like replacement using the Siemens MM0202B1150 panel.

I am making what I believe is a genuine attempt to rectify the situation to the best of my ability and PG&E appears to be making this completely impossible. As soon as the deviation from norms was surfaced to me I took immediate action to work with PG&E to plan a rectifying plan and was met with nothing but hostility. This has been, bar none, the worst experience I have ever had with a bureaucracy in my life. PG&E has made it absolutely clear that they are fully uninterested in working with me to come to a resolution.

I am not trying to avoid culpability. I am not trying to avoid PG&E requirements. I am not trying to avoid paying for *appropriate* engineering work to evaluate my replacement request. I am just trying to get this project back to some semblance of reasonable facts-based progress.

- Andrew

A note about PG&E's response to the incorrect panel:

While I accept that the wrong panel was installed per PG&E regulations, I believe it was immediately obvious on PG&E's initial inspection that the electrician had made a genuine attempt to install a panel configured appropriately for the incoming service size, and that there was a simple and rectifiable discrepancy between the intent of the work and the actual work performed.

PG&E's initial response to the incorrectly-spec'd panel was to ignore the obvious discrepancy and perform a bunch of engineering work to 'make the panel work', spending a lot of money against the engineering deposit in doing so. Nobody asked them to do this, nor was there any immediate reason to do so. Certainly I did not ask them to do this, and had they proposed this course of action prior to doing the work I would have immediately declined.

I believe a very reasonable initial response would have been to put the application on hold and simply *ask* the electrician if they were aware of the regulation regarding PG&E panel sizing. The application was for 125A and the disconnect was for 125A. There was clearly no intent to install 200A equipment, and thus no reason to evaluate the service feeders for 200A service. Further, there was no immediate safety issue - while the panel itself was rated for 200A, the installed disconnect was 125 which was well and obviously within the capacity of the service feeders. The only actual problem was clerical in nature, not technical.

Had PG&E merely *asked what the intent was* this misunderstanding could have easily been surfaced much earlier, faster, and with less cost. We then could have done a much more focused engineering effort to find a practicable solution that meets everybody's requirements.

It is extremely frustrating that PG&E was able to just do whatever they wanted, with no transparency or accountability to me, the person requesting the work or to my electrician, the person doing the work. We were simply left in the dark while PG&E spent our time and money on doing a completely pointless and baseless engineering activity that nobody asked for.

I am a building science researcher, and my career is focused on residential electrification and service-upgrade avoidance. I am professionally invested in building electrification on existing infrastructure, and as such I am very against needless service upgrades or over-specified infrastructure. I do not want a service upgrade, and had PG&E simply sent me a communication asking about the discrepancy I would have immediately and without hesitation begun working on a solution that did not require a service upgrade. Instead, PG&E appeared to embark with single-minded focus on a path which maximized the amount of work required to solve the problem, and made every effort to prevent me from having any input or visibility into the process.

As I reach the end of this experience, it is frankly hard to reach any conclusion other than that PG&E was simply attempting to punish me for my transgression in whatever way possible. I believe PG&E would not have had any issue had the electrician originally installed a 150A panel, even if all else remained the same.

- Andrew