



FILED

06/22/26

04:59 PM

C2606032

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

LAMONT PUBLIC UTILITY DISTRICT

Complainant,

vs.

PACIFIC GAS AND ELECTRIC COMPANY
(U39E)

Defendant.

Case (C.) _____

Complaint

COMPLAINANT	DEFENDANT (Include Utility "U-Number," if known)
LAMONT PUBLIC UTILITY DISTRICT SCOTT TAYLOR, GENERAL MANAGER 8624 SEGRUE ROAD LAMONT, CA 93241 661-845-1213 STAYLOR@LPUD.ORG	PACIFIC GAS AND ELECTRIC COMPANY (U39E) Attn: Cliff Gleicher, Managing Counsel 300 Lakeside Drive, Oakland, CA 94612 T1: 415-971-2678, Email 1: Cliff.Gleicher@pge.com Email 2: pgetariffs@pge.com

(Internal Use Only)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

COMPLAINT

Additional complainant(s) (Provide name, address, phone number and email address for each complainant)

Name of Complainant	
Address	
Daytime Phone Number	
Email Address	

☒ One/sole complainant is representative listed in Box C-1

☐ Additional complainants listed in attachment

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

Name of Defendant	
Address	
Daytime Phone Number	
Email Address	

Name of Defendant	
Address	
Daytime Phone Number	
Email Address	

Name of Defendant	
Address	
Daytime Phone Number	
Email Address	

Have you tried to resolve this matter informally with the Commission's Consumer Affairs staff?

☐ YES ☒ NO

Do you have money on deposit with the Commission?

☐ YES ☒ NO

Amount \$ _____

Has staff responded to your complaint?

☐ YES ☒ NO

Is your service now disconnected?

☒ YES ☐ NO

Did you appeal to the Consumer Affairs Manager?

☐ YES ☒ NO

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

See attached Explanation of Complaint

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):

Issue is simple...

PGE should make the necessary load and electrical improvements associated with the wells to provide power to our wells NOW, not three to four years from now. People's health depend on that power for clean safe drinking water as mandated by State Safe Drinking Water Act.

The issue is timely. it needs to be exponentially sooner than later. And, PGE had plenty of notice.

(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): 7/22/26

Hearing (Example: 7/1/09): 8/24/26

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

LPUD requests the most expeditious schedule as possible as \$40 mil grant and human health is at jeopardy.

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

LPUD requests an order directing PGE to immediately provide an approved electrical design for Well #22 and begin the construction and improvements to provide power to Well #22 and Well #23 no later than May 2027.

OPTIONAL (OPT OUT OF ELECTRONIC SERVICE): I/we would like to receive the answer and other filings of the defendant(s) and information and notices from the Commission by mail (paper only). My/our mailing address(es) is/are:

Dated Lamont, California, this 22 day of June, 2026
(City) (date) (month) (year)

Scott Taylor

Digitally signed by Scott Taylor
Date: 2026.06.22 13:31:34 -0700

Signature of each complainant

(MUST ALSO SIGN VERIFICATION AND PRIVACY NOTICE)

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: Scott Taylor, General Manager, Lamont Public Utility District

Address: 8624 Segrue Road, Lamont, CA 93241

Telephone Number: 661-845-1213

E-mail: STAYLOR@LPUD.ORG

Signature: Scott Taylor

 Digitally signed by Scott Taylor
Date: 2026.06.22 13:31:51 -07'00'

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.

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

(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.

Executed on June 22, 2026, at Lamont, California
(date) (City)

Scott Taylor

Digitally signed by Scott Taylor
Date: 2026.06.22 13:32:54 -07'00'

General Manager

Signature of Officer

Title

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.

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.

Scott Taylor

Digitally signed by Scott Taylor
Date: 2026.06.22 13:33:13 -07'00'

Signature

June 22, 2026

Date

Scott Taylor, General Manager, Lamont Public Utility District

Print your name

Lamont Public Utility District Explanation of Complaint

Lamont Public Utility District ("LPUD") provides drinking water to approximately 20,000 people via 8 water wells. LPUD received a \$40 million grant from the State Water Board to consolidate with a smaller mutual water company due to contaminated water. This is done under the State's mandated Safe Drinking Water Act.

LPUD is constructing three new wells for that consolidation via the \$40 mil State grant funding. PG&E has stated at the "11th hour" that they (PGE) will not provide electrical power to operate two of the wells (well #22 and 23) for a minimum of three years into the future because of their schedule, even though they had approximately two years notice.

Applications for power was submitted and accepted by PGE in May 2025 for all three wells. PGE approved and issued design plans and conducted inspections for Well #23 (PM#35655636, this is PGE's project and design approval for well #23). LPUD began construction of the three wells. LPUD is now approximately 4-6 months from completion of the \$40 mil State funded consolidation project and PGE informed LPUD, on June 18, 2026 they will not provide power for 3 or more years from now, ie: 2029-2030.

LPUD NEEDS power to those wells now, not three years from now. This State mandated consolidation has been in the works for several years and funding was finally provided. Real people NEED safe clean drinking water and it is a legal mandate under the Safe Drinking Water Act. PGE was on notice that power was needed. PGE created and approved a design plan and conducted inspections to insure power for Well #23.

PGE has now refused to provide power for well #23 and has refused to issue an electrical design plan for Well #22 to receive power. This jeopardizes completion of a \$40 mil State funded project and more importantly, PGE's refusal to provide power timely jeopardizes the health and safety of people who need the water. This last minute decision is tantamount to injecting people with cancer because of PGE's refusal of power to provide clean SAFE drinking water to humans.

PGE can provide power. PGE simply refuses to do the upgrades and improvements necessary to provide power even though they had notice. PGE had over a year of notice to make the improvements, yet PGE now informs LPUD they will not do so. People need and are legally mandated to receive clean safe water. LPUD can do that, but LPUD needs PGE to provide the power for the well operations. LPUD needs the power to the wells to provide safe clean drinking water to real people.