

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



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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
(Filed May 15, 2025)

**RESPONSE OF THE UTILITY REFORM NETWORK
TO THE MOTION OF PACIFIC GAS AND ELECTRIC COMPANY
TO SCHEDULE AN UPDATE PHASE**

August 7, 2026

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**RESPONSE OF THE UTILITY REFORM NETWORK
TO THE MOTION OF PACIFIC GAS AND ELECTRIC COMPANY
TO SCHEDULE AN UPDATE PHASE**

On July 31, 2026, Pacific Gas and Electric Company (PG&E) filed a motion requesting that the Commission schedule an update phase for PG&E's 2027 General Rate Case (GRC). Pursuant to Rule 11.1 of the Commission's Rules of Practice and Procedure and the Administrative Law Judge's Ruling granting PG&E's request for a shortened response time and setting the due date as August 7, 2026, The Utility Reform Network (TURN) files this response to PG&E's motion.¹

PG&E offers a preview of the contents of the update testimony it will submit, should the Commission schedule an update phase, and suggests that the combined effect of these updates will be a Test Year 2027 revenue requirement increase of \$20 million.² PG&E also offers a proposed schedule for resolving the update phase.³

TURN does not address the appropriateness of the contents of PG&E's intended update testimony at this time. If the Commission grants PG&E's motion for an update phase, TURN will evaluate the merits of PG&E's update testimony, including the scope of updates proposed by PG&E and the reasonableness of associated GRC revenue requirement changes. TURN reserves the right to challenge any aspect of update testimony that PG&E may submit if permitted by the Commission.

¹ E-Mail Ruling Granting PG&E's Motion to Shorten Time for Responding to Its Motion to Schedule an Update Phase, 8/4/26.

² PG&E Motion to Schedule an Update Phase (PG&E Motion), pp. 1-3.

³ PG&E Motion, p. 5.

TURN's response is limited to addressing PG&E's proposed schedule for the update phase. PG&E proposes to serve its update testimony two calendar days after parties respond to its motion, presumably based on an assumption that the Commission will rule on PG&E's motion by then.⁴ PG&E would then have motions for additional evidentiary hearing on PG&E's update testimony due 13 calendar days later, with 1-2 days of hearing set roughly 25 days thereafter, followed by opening and reply briefs.⁵ TURN is concerned that 13 calendar days may be insufficient for parties to conduct any necessary discovery on PG&E's update testimony and determine whether to file a motion for evidentiary hearing. Permitting time for discovery is beneficial because discovery might (1) alleviate the need for evidentiary hearing and further process, (2) reveal that discovery responses could be admitted into the record in lieu of cross-examination to support briefing, and (3) otherwise allow parties to avoid spending hearing time on what could have been accomplished through discovery.

Accordingly, if the Commission grants PG&E's motion for an update phase of this GRC, TURN recommends that the Commission ensure that parties have a meaningful opportunity to conduct discovery on PG&E's forthcoming update testimony. A requirement that PG&E provide discovery responses in an expedited timeframe (e.g., 5 calendar days) would help, as would additional time before the due date for motions for evidentiary hearing.

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⁴ PG&E Motion, p. 5.

⁵ *Id.*

Date: August 7, 2026

Respectfully submitted,

By: _____/s/_____
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