

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

**REPLY OF THE PUBLIC ADVOCATES OFFICE
TO THE MOTION OF PACIFIC GAS AND ELECTRIC COMPANY
(U 39 M) TO SCHEDULE AN UPDATE PHASE**

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OF THE STATE OF CALIFORNIA

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)

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TO THE MOTION OF PACIFIC GAS AND ELECTRIC COMPANY
(U 39 M) TO SCHEDULE AN UPDATE PHASE**

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) files this reply pursuant to Rule 11.1(e) of the California Public Utilities Commission’s (Commission’s) Rules of Practice and Procedure and Administrative Law Judge (ALJ) Larsen’s August 4, 2026 Email Ruling regarding the *Motion of Pacific Gas and Electric Company (U 39 M) to Schedule An Update Phase (Update Motion)*¹ in the *Application of Pacific Gas and Electric Company’s (PG&E) for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2027* (Application).

I. INTRODUCTION

PG&E cites the Commission's Rate Case Plan as authority for a utility applicant “to present additional testimony in a post-hearing update phase to reflect various changes since the applicant’s original GRC forecasts.”² PG&E states its proposed update “will result in a revenue requirement increase of approximately \$20 million for the 2027 Test

¹ On Friday, July 31, 2026, PG&E filed a *Motion to Shorten Time to Respond to PG&E’s Motion to Schedule an Update Phase* (Motion to Shorten Time) concurrently with its Update Motion, which would have required parties to respond to PG&E’s motion within three business days on Wednesday, August 5, 2026.¹ ALJ Larsen’s Email Ruling grants PG&E’s motion in part, in that it allows parties five business days until Friday, August 7, 2026 to respond.

² Update Motion at 1.

Year”³ for labor and tax costs. Cal Advocates requires adequate time to evaluate whether it approves PG&E’s proposed updates. The Commission should provide adequate time for intervenors to review PG&E’s proposed update testimony, conduct discovery, and determine whether to serve responsive testimony and request evidentiary hearings.

II. DISCUSSION

PG&E’s proposed schedule allows intervenors only 13 days to review PG&E’s updated testimony and submit a potential “Motion for Additional Evidentiary Hearing.”⁴ 13 days is wholly inadequate for intervenors to review the update testimony for labor and tax costs when PG&E has not yet provided the update costs. Cal Advocates must have sufficient time to conduct potential discovery.

PG&E plans to serve its update testimony the same date intervenors are required to file their response to PG&E’s Update Motion.⁵ As a result, questions persist as to how the updated labor escalation rate will be incorporated (i.e. will it be in a single volume of testimony and workpapers) and whether the tax expenses will be impacted by the updated labor costs, and if so, how will that be presented? Given these ambiguities, Cal Advocates cannot at this time gauge the extent of work that will be required as a result of PG&E’s update.

Given the potential complexity of PG&E’s update testimony and Cal Advocates’ current caseload covering August-October 2026,⁶ the Commission should allow intervenors to serve testimony on Friday, October 30, 2026. Cal Advocates also respectfully reserves the right to request evidentiary hearings and a schedule for briefing.

³ Update Motion at 1-2.

⁴ Update Motion at 1.

⁵ Update Motion at 5.

⁶ A.24-10-014 (PG&E Billing Modernization), A.26-03-031 (PG&E Diablo Canyon Power Plant 2027 Cost Recovery), A.25-12-014 (PG&E/StanPac Section 851), A.25-12-015 (SCE Sale of North Coast Property 851), A.26-01-004 (Lodi & Wildgoose Transfer 854), and A.26-03-003 (SCE Catalina Gas & Water Cost Recovery).

If Cal Advocates finds that issuance of testimony is unnecessary, Cal Advocates will notify the Commission.

III. CONCLUSION

The Commission must provide sufficient time for intervenors to review PG&E's proposed update testimony, conduct discovery, determine whether to serve responsive testimony, and request evidentiary hearings. Given the potential complexity of PG&E's update testimony and other factors, the Commission should allow intervenors to serve testimony on Friday, October 30, 2026 and reserve time for evidentiary hearings that may be needed.

Respectfully submitted,

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