



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

Application of Pacific Gas and Electric
Company for Approval of Its Billing
Modernization Initiative

(U 39 M)

Application No. 24-10-014
(Filed October 23, 2024)

FILED

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**JOINT MOTION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 M) AND THE
JOINT COMMUNITY CHOICE AGGREGATORS TO REOPEN THE RECORD AND
MOTION FOR LEAVE TO FILE UNDER SEAL THE CONFIDENTIAL VERSION OF
ATTACHMENT A TO THE JOINT REPLY COMMENTS**

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AGGREGATORS

Dated: August 25, 2026

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I. INTRODUCTION

Pursuant to Rules 11.1, 11.4, and 13.15(b) of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E) and WestLight Energy,¹ Ava Community Energy, Central Coast Community Energy, Marin Clean Energy, City of San José, Silicon Valley Clean Energy, and Sonoma Clean Power Authority (collectively, the Joint CCAs, and together with PG&E, the Settling Parties)² respectfully submit this motion to reopen the record to admit, under seal as Exhibit PG&E-08C, Attachment A Confidential, which contains a breakdown of the \$24 million incremental cost forecast associated with the proposals in the Partial Settlement Agreement filed July 9, 2026 by the Settling Parties (the Partial Settlement Agreement). Attachment A is included with the Joint Reply Comments concurrently filed with this motion.

**II. THE COMMISSION SHOULD PERMIT THE SETTling PARTIES TO
SUPPLEMENT THE RECORD UNDER RULE 13.15(B) TO RESOLVE AN
ISSUE RAISED IN COMMENTS TO THE PARTIAL SETTLEMENT
AGREEMENT**

Rule 13.15(b) requires that a motion to reopen “specify the facts claimed to constitute

^{1/} Formerly Peninsula Clean Energy Authority.

^{2/} Note that the City and County of San Francisco, acting by and through its Public Utilities Commission (CleanPowerSF), joined in the Joint CCAs’ June 30, 2025, Direct Testimony submission and its July 30, 2025, Rebuttal Testimony submission. However, CleanPowerSF is not included in the group of Joint CCAs as defined in the Partial Settlement Agreement. CleanPowerSF submitted comments in support of the Partial Settlement Agreement on August 10, 2026.

grounds in justification thereof, including material changes of fact or law alleged to have occurred,” and “contain a brief statement of proposed additional evidence and explain why such evidence was not previously adduced.”³ These requirements are satisfied, as explained below.

This motion is made to address concerns raised in the joint comments of the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), The Utility Reform Network (TURN), and Small Business Utility Advocates (SBUA) (collectively, the Settlement Opponents) filed August 10, 2026 opposing the cost recovery provisions of the Partial Settlement Agreement. The Settlement Opponents suggest that the Commission cannot approve the \$24 million incremental cost forecast associated with the settlement agreement proposals because of a lack of transparency around these cost forecasts. However, Settlement Opponents made no effort to learn more about these forecasts. Neither PG&E nor the Joint CCAs have received discovery requests about any aspect of the Partial Settlement Agreement, despite the fact that the Settling Parties filed the agreement over a month before the record closed.⁴

While the Settling Parties maintain that the record as submitted supports this \$24 million forecast, in the interest of providing parties and the Commission with more insight into how the Settling Parties arrived at these forecasts, the Settling Parties have agreed to provide the cost estimates for the settlement agreement proposals shared during the course of their settlement negotiations. Attachment A (Confidential) contains cost estimates for each of the proposals in the Partial Settlement Agreement. Granting this motion will assist the Commission in evaluating the Partial Settlement Agreement. The Settling Parties therefore ask that the Commission supplement the record with the attached Exhibit PG&E-08C. Because this motion provides evidence that the Settlement Opponents assert is necessary for the Commission to evaluate the Partial Settlement Agreement, the Settlement Opponents could have elicited this evidence in discovery prior to the close of the record but failed to do so, and the Settling Parties do not object to moving this evidence into the record, granting this motion will not prejudice any party.

^{3/} Rule 13.15(b).

^{4/} A.24-10-014, Assigned Commissioner’s Scoping Memo and Ruling, p. 6 (March 27, 2025) (“The proceeding will stand submitted upon the filing of reply briefs”).

III. THE ADDITIONAL INFORMATION SHOULD BE FILED UNDER SEAL PURSUANT TO RULE 11.4

Public Utilities Code Section 583(a) provides that, “[n]o information furnished to the commission by a public utility. . . except those matters specifically required to be open to public inspection by this part, shall be open to public inspection or made public, except on order of the commission, or by the commission or a commissioner in the course of a hearing or proceeding.”⁵ In addition, Section 454.5(g) provides that the Commission shall adopt “appropriate procedures to ensure the confidentiality of any market sensitive information” submitted by a utility in connection with procurement-related activities.

Attachment A Confidential contains a breakdown of the \$24 million incremental cost forecast associated with the proposals in the Partial Settlement Agreement. Some of these proposals may require additional vendor services, but PG&E has not yet engaged in discussions or negotiations with such vendors. Disclosure of PG&E’s initial estimates may interfere with such negotiations (or negotiations between similarly situated California utilities and their vendors). Therefore, the estimates are market sensitive information, the disclosure of which would be against the public interest. The Settling Parties request that the Commission grant this request to file Attachment A Confidential under seal as Exhibit PG&E-08C. As required by Rule 11.4(a), a Proposed Ruling is attached to this motion.

IV. CONCLUSION

For the foregoing reasons, the Settling Parties respectfully request that the Commission grant this motion to reopen the record to admit Attachment A Confidential under seal as Exhibit

^{5/} All further statutory references are to the California Public Utilities Code, unless otherwise indicated.

PG&E-08C. Attachment A is included with the Joint Reply Comments concurrently filed with this motion.

Respectfully Submitted,

By: /s/ Aaron J. Lewis
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[PROPOSED] RULING

In accordance with its Rules of Practice and Procedure, the California Public Utilities Commission (Commission) has considered the joint motion of Pacific Gas and Electric Company (PG&E) and WestLight Energy,¹ Ava Community Energy, Central Coast Community Energy, Marin Clean Energy, City of San José, Silicon Valley Clean Energy, and Sonoma Clean Power Authority (collectively, the Joint CCAs, and together with PG&E, the Settling Parties)², filed August 25, 2026 for leave to reopen the record and file a breakdown of the \$24 million incremental cost forecast associated with the proposals in the Partial Settlement Agreement filed July 9, 2026 under seal as Exhibit PG&E-08C (Motion). The Commission rules as follows:

1. The Settling Parties' Motion is granted. The protected materials in the confidential attachment to the Motion shall be marked as Exhibit PG&E-08C and admitted to the record.
2. This information shall remain under seal, and shall not be made accessible or disclosed to anyone other than the Commission staff except on the further order or ruling of the Commission, the Assigned Commissioner, the Assigned Administrative Law Judge ("ALJ"), or the ALJ then designated as Law and Motion Judge.

Dated _____, _____ at San Francisco, California.

Administrative Law Judge

¹/ Formerly Peninsula Clean Energy Authority.

²/ Note that the City and County of San Francisco, acting by and through its Public Utilities Commission (CleanPowerSF), joined in the Joint CCAs' June 30, 2025, Direct Testimony submission and its July 30, 2025, Rebuttal Testimony submission. However, CleanPowerSF is not included in the group of Joint CCAs as defined in the Partial Settlement Agreement. CleanPowerSF submitted comments in support of the Partial Settlement Agreement on August 10, 2026.

VERIFICATION

I, Matthew Hedges, am an employee of Pacific Gas and Electric Company, a corporation, and am authorized to make this verification on its behalf. I have read the foregoing:

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The statements in the foregoing document are true to my own 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 this 25th day of August, 2026, at Oakland, California.

/s/ Matthew Hedges

Matthew Hedges
Senior Manager of Billing Technology
Pacific Gas and Electric Company