BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED
09/16/26
03:03 PM
A2411007

Application of Pacific Gas and Electric Company (U39E) for Approval of Electric Rule No. 30 for Transmission-Level Retail Electric Service.	Application 24-11-007

THE PUBLIC ADVOCATES OFFICE
NOTICE OF EX PARTE COMMUNICATION

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) hereby gives notice of the following *ex parte* communication in A.24-11-007 pursuant to Rule 8.4 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure. The communication took place via Webex on September 11, 2026, from approximately 2:30pm to 3:00pm, with Michael Mullaney, Acting Chief of Staff and Senior Advisor to President John Reynolds. The following Cal Advocates representatives attended: Karin Hieta, Program Manager; and David Peck, Program and Project Supervisor.

Cal Advocates initiated discussion to provide its support for the amended Draft Resolution E-5455 and walked through a handout outlining its position (included here as Attachment A). Additionally, Cal Advocates provided an overview of other ratepayer protections it has proposed in PG&E's Rule 30 proceeding (A.24-11-007) and explained how the amended Draft Resolution E-5455 is consistent with some of those proposals.

Respectfully submitted,

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September 16, 2026

ATTACHMENT A

The Public
ADVOCATES
OFFICE

Draft Resolution E-5455

Proceeding No: A.24-11-007 | Date: September 11, 2026

The Commission should adopt the redlined version of Draft Resolution E-5455.

Revised Draft Resolution E-5455 strikes a balance by requiring an appropriate refundable upfront advance from Google.

- Upfront advances for transmission network upgrades are necessary to mitigate ratepayer risk for billions of dollars of transmission infrastructure.
- Revised Draft Resolution E-5455 recognizes the financial risk to ratepayers from Google's reliance on significant transmission network upgrades and addresses that risk by requiring that Google provide a refundable upfront advance of $600,000/MW.
    - "We expect that any additional capital advance be treated as an offset in the appropriate PG&E account, thus reducing general transmission rates until that advance is refunded."
- **Advances allocate risk, not permanent costs.** Upfront advances are temporary and refundable, ensuring data center customers are made whole once transmission costs are recovered through rates.
- **Short-to-medium term ratepayer protections remain necessary.** Ratepayers are exposed to risk immediately when transmission infrastructure is constructed. Potential benefits may only materialize gradually over many years, and only at high utilization rates.
- **Refundable advances avoid overbuilding transmission network upgrades.** Advances can reduce speculative requests in the data center interconnection queue. There is no evidence that Type 4 refundable advances deter viable projects.
- PG&E and Google's recent commitment to the **Ratepayer Protection Pledge,** which explicitly calls out "network upgrade costs" commitments, is consistent with requiring data centers to provide refundable Type 4 customer advances.