

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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A2511001

Application of Pacific Gas and Electric
Company for Review and Recovery of
Costs Associated with the 2019 Kincade
Fire and 2021 Dixie Fire under AB 1054
(U39M).

Application 25-11-001

**MOTION OF THE PUBLIC ADVOCATES OFFICE TO INCREASE THE PAGE
LIMIT FOR REPLY BRIEFS AND TO SHORTEN THE TIME TO RESPOND**

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September 22, 2026

I. INTRODUCTION

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) files this Motion to Increase the Page Limit for Reply Briefs and to Shorten Time to Respond in the above-captioned application (A.) 25-11-001. The motion is submitted pursuant to Rule 11.1 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure (Rules), and the schedule and page limits established by the Assigned Commissioner and Administrative Law Judge (ALJ).¹ Cal Advocates respectfully requests that the page limit for all parties' reply briefs be increased from 30 pages to 36 pages.

Reply briefs are due October 2, 2026, and Cal Advocates does not request any change to that date. Under Rule 11.1(e), responses to this motion are currently due October 7, 2026, which is after the submission of reply briefs on October 2, 2026. Therefore, Cal Advocates requests an order shortening time for the filing of any response to this motion, with the responses to be filed by September 25, 2026, so that the ALJ can issue a timely ruling.

II. DISCUSSION

The ALJ's August 14, 2026 Email ruling (ALJ Ruling) increased the page limit for opening briefs from 50 to 75 pages and set the due date for simultaneous opening briefs as September 11, 2026.² It further set the due date for simultaneous reply briefs as October 2, 2026.³ Despite increasing the page limit for opening briefs, the ALJ Ruling kept the reply brief page limit at 30 pages "for now," and provided that "[a] motion to increase the reply brief page limit may be made after the opening briefs have been served and filed."⁴

¹ A.25-11-001, *Assigned Commissioner's Scoping Memo and Ruling* (Scoping Memo), Dec. 12, 2025, at 8; *Email Ruling Taking Evidentiary Hearings off Calendar and Setting Procedural Requirements and Modifications*, Aug. 14, 2026 (ALJ Ruling).

² ALJ Ruling at 3.

³ ALJ Ruling at 3.

⁴ ALJ Ruling at 3.

PG&E, Cal Advocates, and the Small Business Utility Advocates (SBUA) filed and served opening briefs on September 11, 2026. PG&E's opening brief is 59 pages long. Cal Advocates' reply brief must respond to the arguments in both PG&E and SBUA's opening briefs based on the extensive evidentiary record in this proceeding. Addressing two opening briefs and PG&E's arguments on both the 2019 Kincade Fire and 2021 Dixie Fire within 30 pages would be challenging. A full response will help ensure a complete record on the reasonableness of the costs PG&E seeks to recover.

The requested increase of 6 pages, or 20 percent of the current limit, is modest. Applying the increase to all parties will allow each party to respond fully to the opening briefs. The increase does not affect the schedule and will not prejudice any party.

Cal Advocates has notified counsel for PG&E of its intent to file this motion. PG&E does not oppose the motion.

III. RELIEF REQUESTED

For the foregoing reasons, Cal Advocates respectfully requests that:

1. The page limit for reply briefs be increased from 30 pages to 36 pages for all parties; and
2. Response to this motion be due by September 25, 2026.

Respectfully submitted,

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