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

Application of Pacific Gas and Electric
Company for Adoption of Electric Revenue
Requirements and Rates Associated with its
2027 Energy Resource Recovery Account
(ERRA) and Generation Non-Bypassable
Charges Forecast and Greenhouse Gas
Forecast Revenue Return and Reconciliation

Application 26-05-007
(Filed May 15, 2026)

(U 39 E)

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
RESPONSE TO CALIFORNIA COMMUNITY CHOICE
ASSOCIATION'S REQUEST FOR EVIDENTIARY
HEARINGS**

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Dated: September 29, 2026

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

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OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric
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I. INTRODUCTION AND SUMMARY

On September 24, 2026, the California Community Choice Association (“CalCCA”) filed a request for one-hour of evidentiary hearing concerning retained Resource Adequacy (“RA”) values (hereinafter “Request”) in Pacific Gas and Electric Company’s (“PG&E”) *Application for Adoption of Electric Revenue Requirements and Rates Associated with its 2027 Energy Resource Recovery Account (“ERRA”) and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation*, in Commission docket 26-05-007. Pursuant to Rule 11.1 (e) of the Commission’s Rules of Practice and Procedure and the Administrative Law Judge’s (“ALJ”) email ruling, issued September 25, 2026, PG&E timely submits this response.

PG&E respectfully submits that it does not believe evidentiary hearings are needed at this time. As of 11:30 AM, CalCCA’s counsel communicated to PG&E counsel that it withdraws its request for hearings based on PG&E’s discovery responses, which have helped narrow the material factual issues in dispute in this case, and based on PG&E’s representation that it will stipulate to the admission of its responses to CalCCA’s discovery requests issued following the submission of PG&E’s rebuttal testimony. Thus, in PG&E’s view, no hearing is required and

PG&E respectfully requests that hearings be removed from the Commission's calendar.

Indeed, the primary basis for CalCCA's Request was its assertion that additional factual development was necessary because certain discovery responses remained outstanding at the time the Request was filed. Since then, PG&E has completed responses to the discovery requests identified in Attachments A and B and has provided extensive information regarding the calculations, assumptions, and market observations discussed in PG&E's Rebuttal Testimony. As a result, the factual record has been substantially developed, and any need for further factual inquiry has been significantly narrowed. PG&E confirms does not object to the admission of its discovery responses concerning retained RA valuation, thereby ensuring that the Commission has the benefit of the most complete factual record available without unnecessary expenditure of party and Commission resources.

Thus, with limited hearing requested by CalCCA withdrawn, there is no need for evidentiary hearing.

II. SUMMARY OF THE REQUEST FOR HEARING

A. CalCCA's Request

The Request seeks evidentiary hearing because CalCCA disputes the reasonableness of PG&E's approach to calculating the retained RA associated with its non-storage Power Charge Indifference Adjustment ("PCIA") eligible resources.¹ CalCCA asserts that the dispute involves policy and legal issues, as well as material issues of disputed fact.² CalCCA lists six areas of purported disputed factual issues concerning issues discussed on pages 3-3 through 3-7 and Attachment A to Chapter 3 of PG&E's Rebuttal Testimony, which generally seek clarification concerning the calculations therein and PG&E's perspective on the RA market and its pricing.³

CalCCA explains that it issued discovery following PG&E's Rebuttal Testimony, attached to its Request as Attachments A and B, that some of that discovery was pending at the

¹/ Request, p. 3

²/ Id.

³/ Id., pp. 3-4.

time the Request was filed, and that PG&E's responses may narrow the need for live witness cross-examination.⁴ CalCCA does not identify specific evidence it would introduce at hearing but clarifies that it would provide the ALJ and parties a list of proposed exhibits if a hearing is granted. CalCCA anticipates one hour of cross examination of PG&E witness Keller, does not anticipate cross examining any other witness, but reserves its right to ask questions of any witness that takes the stand.⁵

B. Positions of Other Parties

No other party requested evidentiary hearing.

III. PG&E'S RESPONSE.

CalCCA's Request relies heavily on the assertion that additional factual development is necessary because certain discovery responses relating to PG&E's Rebuttal Testimony were pending as of September 24, 2026. As of 11:30 AM today, CalCCA's counsel withdrew its hearing request through a communication to PG&E,

As of September 28, 2026, PG&E had responded to all discovery requests identified in Attachments A and B.⁶ Through those responses, PG&E clarified the aspects of its Rebuttal Testimony identified by CalCCA as requiring further factual development, including PG&E's forward price assumptions and the analyses supporting PG&E's Rebuttal Testimony.

While PG&E's testimony contained a sufficient evidentiary record for the Commission to evaluate the retained RA issues presented in this proceeding, PG&E does not object to the admission of the two sets of discovery responses into the evidentiary record of this proceeding to augment the factual record. It is PG&E's assessment that disputes largely concern the interpretation of evidence and the appropriate methodology to apply, rather than disputes of material fact. For example, certain issues listed by CalCCA, such as whether CalCCA's

^{4/} Request, p. 4.

^{5/} Id., p. 4.

^{6/} Additionally, PG&E has responded to a set of CalCCA discovery that was not appended to its Request, and propounded on PG&E on September 25, 2026.

proposal overstates solar value, appear to concern policy and methodological disagreement rather than genuine disputes of material fact.

Pursuant to Rule 12.3, the Commission may decline to set evidentiary hearings if there are no material contested issues of fact, or if the contested issue is one of law. Such issues are routinely resolved in PG&E's ERRRA forecast proceedings through opening and reply briefs, and do not require evidentiary hearing. PG&E's testimony, supplemented by PG&E's discovery responses, provides ample information to evaluate the parties' competing views on the reasonableness of PG&E's retained RA methodology. Further, the parties may brief any legal or policy issues in opening and reply briefs.

PG&E has expended efforts to eliminate the need for evidentiary hearing to conserve the resources of the Commission and of all parties. As described above, CalCCA counsel communicated the withdrawal of its request the morning of September 29.

Thus, it is PG&E's position that hearing is required and PG&E respectfully requests that hearings be removed from the Commission's calendar.

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IV. CONCLUSION

PG&E made substantial efforts to avoid the need for the evidentiary hearing requested by CalCCA by responding to its extensive discovery and providing additional facts regarding the issues identified in the Request. PG&E appreciates CalCCA's withdrawal of its hearing request.

Respectfully Submitted,

By: /s/ Maria V. Wilson

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