



FILED

09/25/26

04:59 PM

C2609024

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

Ruben Alvarez

Complainant,

vs.

Pacific Gas and Electric Company (U39E)

Defendant.

Case (C.) _____

Complaint

COMPLAINANT	DEFENDANT (Include Utility "U-Number," if known)
Ruben Alvarez 446 Lexington Ave Hayward, CA 94544 (510) 825-6729 rubenalvarez454@yahoo.com	Pacific Gas and Electric Company (U39E) Attn: Cliff Gleicher, Managing Counsel 300 Lakeside Drive Oakland, CA 94612 415-971-2678 Email 1: cliff.gleicher@pge.com Email 2: pgetariffs@pge.com

(Internal Use Only)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

COMPLAINT

Additional complainant(s) (Provide name, address, phone number and email address for each complainant)

Name of Complainant	
Address	
Daytime Phone Number	
Email Address	

☒ One/sole complainant is representative listed in Box C-1

☐ Additional complainants listed in attachment

Additional Defendant(s) (Provide name, address, phone number and email address for each defendant)

Name of Defendant	
Address	
Daytime Phone Number	
Email Address	

Name of Defendant	
Address	
Daytime Phone Number	
Email Address	

Name of Defendant	
Address	
Daytime Phone Number	
Email Address	

Have you tried to resolve this matter informally with the Commission's Consumer Affairs staff?

☒ YES ☐ NO

Do you have money on deposit with the Commission?

☐ YES ☒ NO

Amount \$ _____

Has staff responded to your complaint?

☐ YES ☒ NO

Is your service now disconnected?

☐ YES ☒ NO

Did you appeal to the Consumer Affairs Manager?

☐ YES ☒ NO

Explain fully and clearly the details of your complaint. (Attach additional pages if necessary and any supporting documentation)

See attached additional pg 1-2.

The formal complaint is being submitted at this time to prevent retaliatory disconnection of services and to require that investigative findings and documentation regarding the alleged energy theft be produced for review and comment.

Thus far, Ruben Alvarez has not been provided with any evidence of energy theft despite repeated requests. The Energy Diversion Investigator has issued threats and has attempted to bill for energy consumption levels that are not scientifically or mathematically possible, as verified by a licensed electrician.

Scoping Memo Information (Rule 4.2[a])

(1) The proposed category for the Complaint is (check one):

- ☒ adjudicatory (most complaints are adjudicatory unless they challenge the reasonableness of rates)
☐ ratesetting (check this box if your complaint challenges the reasonableness of rates pursuant to Rule 4.1(b))

(2) Are hearings needed (are there facts in dispute)? ☒ YES ☐ NO

(3) ☒ Regular Complaint ☐ Expedited Complaint (Rule 4.6)

(4) The issues to be considered are

(Example: The utility should refund the overbilled amount of \$78.00):

1. Whether PG&E met its obligations to provide raw data, historical billing logs, electric tariff Rule 17 meter testing results, testimony, utility meter audits, and another other data in support of its billing (CPUC 10.1)
2. Whether PG&E is entitled to bill for estimated energy consumption beyond the lookback window (CPUC 17.1).
3. Whether the amounts of energy consumption claimed are justified, and if the charges are fair and non-excessive (CPUC Section 415)

REPRESENTATIVE'S INFORMATION:

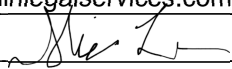
Provide name, address, telephone number, e-mail address (if consents to notifications by e-mail), and signature of representative, if any.

Name of Representative: Alice Lin, Esq.

Address: 2261 Market Street, Suite 312, San Francisco, CA 94114

Telephone Number: (510) 499-9970

E-mail: alice@linlegalservices.com

Signature: 

VERIFICATION
(For Individual or Partnerships)

I am (one of) the complainant(s) in the above-entitled matter; the statements in the foregoing document are true of my 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 9/24/26, at Oakland, California
(date) (City)



(Complainant Signature)

VERIFICATION
(For a Corporation)

I am an officer of the complaining corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to the 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 _____, at _____, California
(date) (City)

Signature of Officer

Title

NUMBER OF COPIES NEEDED FOR FILING:

If you are filing your formal complaint on paper, then submit one (1) original, six (6) copies, plus one (1) copy for each named defendant. For example, if your formal complaint has one (1) defendant, then you must submit a total of eight (8) copies.

If you are filing your formal complaint electronically (visit <http://www.cpuc.ca.gov/PUC/efiling> for additional details), then you are not required to mail paper copies.

Mail paper copies to: California Public Utilities Commission
Attn: Docket Office
505 Van Ness Avenue, Room 2001
San Francisco, CA 94102

PRIVACY NOTICE

This message is to inform you that the Docket Office of the California Public Utilities Commission ("CPUC") intends to file the above-referenced Formal Complaint electronically instead of in paper form as it was submitted.

Please Note: Whether or not your Formal Complaint is filed in paper form or electronically, Formal Complaints filed with the CPUC become a **public record** and may be posted on the CPUC's website. Therefore, any information you provide in the Formal Complaint, including, but not limited to, your name, address, city, state, zip code, telephone number, E-mail address and the facts of your case may be available online for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced complaint.



Signature

9/24/2026

Date

Ruben Alvarez

Print your name

Attached Additional Pages

General Information

Electrical service agreement: 0402313943

Customer: Ruben Alvarez

Service Address: 8925 San Leandro St., Suite F, Oakland, CA

Meter Number: 1011506675

Details of Complaint

Alvarez vacated the service address on July 1, after having received his final bill for \$2,019.31.

Alvarez received a letter dated July 16, 2026 claiming unauthorized use of his account at the Address. Mr. Alvarez immediately reached out to Rodriguez by phone at the contact number provided in the letter, and tried to call her 10-15 times with no response or call back.

On July 23, because Rodriguez was non-responsive and had set a deadline of July 27, Alvarez sent an email to her. Alvarez explained that the meter was stolen several years ago, and requested inspection reports, field notes, and documentation to substantiate any claims and billing associated with the alleged unauthorized use. Rodriguez never responded in writing or provided any documentation substantiating the claims.

On July 24, Rodriguez called Alvarez, confirming receipt of the email and stating that she would not tell Alvarez anything regarding her findings, and that she'd see him in court.

On July 25, Rodriguez left Alvarez a voicemail, requesting that Alvarez move a dog at his mother's personal place of residence so Rodriguez can get access to the PG&E meter. Because Alvarez was not in the area, he contacts his mother and asks her to move the dog.

In spite of Rodriguez's failure to discuss the bill or provide any investigative findings, Alvarez received a PG&E invoice dated September 7, 2026, with a total amount due of over \$4.2M by September 25, 2026. The estimated energy use claimed by PG&E cannot be accurate given the actual energy that could be supplied to the Address.

On September 10, Alvarez called Rodriguez after having reviewed the bill, noting that there must be some mistake because it is scientifically and mathematically impossible for a small warehouse with a 200amp panel to be supplied with the amount of electricity alleged. Rodriguez replied that there was no mistake as she ran the numbers 3 times with the best computers, and that she had seen other warehouses with larger bills. Rodriguez admitted that she had not seen and had no knowledge of the power supply breaker specifications, and that she only knew the size of the building. She claimed that a supervisor had signed off on the \$4.2M invoice.

Without any prompting or mention of the CPUC by Alvarez, Rodriguez advised Alvarez not to contest the bill with the CPUC. She said, “If you think about going to the CPUC, they will take your DCC license away. You have a cannabis license right? They are all part of the state and they will strip your license, so I would be careful about your next move. I wouldn’t want to open up a can of worms if I were you.” When Rodriguez asked for further clarification, Alvarez reiterated that filing a complaint with the CPUC would jeopardize Alvarez’s commercial cannabis license.

Since the September 10 call, Alvarez has taken pictures of the meter, which does not appear to be tampered with. Alvarez has additionally consulted with a licensed electrician to determine the levels of use that are possible given the electrical panel on site, as well as actual use based on Alvarez’s equipment at the warehouse.

Unfortunately, the property is in a high crime area and the meter may have been tampered with. Alvarez has indicated that he is willing to pay for any energy that was consumed by him and that he derived benefit from. However, Alvarez has never committed energy theft nor could he have consumed the levels estimated by Rodriguez.

Alvarez has attempted to contact PG&E directly since his last communication with Rodriguez to resolve the outstanding billing issues, but has been referred back to Rodriguez.

Maximum Theoretical and Actual Use of Power

Ruben Alvarez consulted with Bell Chan, a licensed electrician (License #899541) at Samco Construction Company.

Actual use calculations were provided by Mr. Chan for maximum possible use, according to the specifications of the equipment on site while the account was active. The equipment includes lighting, air conditioning system, electrical fans, and refrigerator, as shown on – **25,652.17kW per month or 307,825.92 kW per year.**

Mr. Chan also calculated the maximum possible use given the specifications of the meter panel. The calculations show the maximum theoretical level at 100% load and the safe continuous capacity 80% limit set by the National Electrical Code. If a user were to operate the equipment 24 hours per day every day of the year, the maximum consumption would be **574,560 kW per year.**

PG&E is claiming use of **3,324,000 kW to 3,600,000 kW per year**, which is not possible given the constraints of the physical capacity of the panel and capabilities of what the copper wiring could carry without melting and causing electrical fires.

Relief Requested

Implement immediate collection freeze, prevent retaliatory service disconnection and threats against Alvarez's business and state cannabis license.

Prohibit transfer of alleged and estimated historical balance to any new accounts held by Ruben Alvarez. Prohibit imposition of late fees, penalties, and imposition of investigative costs.

Grant a motion of protective order to prevent confidential information from being disseminated regarding Ruben Alvarez's commercial cannabis license and operations, for public safety purposes.

Enforce CPUC Rule 10.1, requiring PG&E to provide raw data, historical billing logs, electric tariff Rule 17 meter testing results, testimony, and utility meter audits.

Require that per Public Utilities Code Section 415, PG&E revise its estimated bill so the bill is fair and reasonable, and not discriminatory against legal cannabis growers. Charges should reflect actual usage based on equipment in the warehouse during billed period. This is usage of 25,652.17kW per month, per calculations of a licensed electrician. Allow Alvarez to enter into a payment plan on the balance that is due.

Waive calculated fees that extend past the lookback window (CPUC Rule 17.1), as estimates include periods where PG&E failed to maintain or routinely read its physical equipment.