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

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| Application of Pacific Gas and Electric Company (U 39 E) for Approval of Electric Rule No. 30 for Transmission-Level Retail Electric Service<br>(U 39 E) | Application No. 24-11-007<br>(Filed November 21, 2024) |

# PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E) MOTION TO HOLD PROCEEDING IN ABEYANCE

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Dated: October 5, 2026

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# PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E) MOTION TO HOLD PROCEEDING IN ABEYANCE

On June 18, 2026, the Federal Energy Regulatory Commission ("FERC") issued an Order to Show Cause ("OSC")[1] to the California Independent System Operator ("CAISO") and each of the participating transmission owners ("PTOs") in the CAISO region, including Pacific Gas and Electric Company ("PG&E"). PG&E is required to respond to the roughly 60 deficiencies FERC identified in PG&E's transmission owner ("TO") tariff, including cost responsibility issues that may impact proposed Electric Rule 30. To address these deficiencies, PG&E must propose revisions to its TO tariff by November 16, 2026.[2] Pursuant to Rule 11.1 of the Rules of Practice and Procedure of the California Public Utilities Commission (CPUC or Commission), Pacific Gas and Electric Company (PG&E) respectfully moves to hold this proceeding in abeyance until PG&E's TO tariff is final and effective.

[1] *California Indep. Sys. Operator Corp., et al.*, 195 FERC ¶ 61,214 (2026).

[2] *California Indep. Sys. Operator Corp., et al.*, 196 FERC ¶ 61,131 (2026).

Holding this proceeding in abeyance will allow the Commission to fully consider any impacts of the FERC OSC, including PG&E's final revised TO tariff, as well as new California legislation which may require the Commission to implement certain provisions in Electric Rule 30. While PG&E appreciates Judge Toy's August 7, 2026 Ruling Seeking Comments on Proceeding Status ("Order Reopening Record"), this Order provided parties the opportunity to comment on the OSC. Temporarily staying this proceeding would allow parties to comment on how Electric Rule 30 may be impacted by PG&E's revised TO tariff and new legislation. A stay of this proceeding will enable the Commission to avoid inconsistent regulatory requirements and enact a lasting regulatory structure for interconnection of retail transmission-level customers.

Any stay of this proceeding should not delay the Commission's consideration of the May 7, 2026 Partial Settlement Agreement, which addresses information sharing issues that are unrelated to the FERC OSC or new legislation.[3]

## I. BACKGROUND

### A. Electric Rule 30

PG&E filed an application seeking approval of Electric Rule No. 30 on November 21, 2024. Proposed Electric Rule No. 30 sought to "create[] a streamlined, transparent, and equitable approach for interconnecting … non-residential customers requesting retail electric service at transmission voltages between 50kV and 230kV."[4]

[3] *See* Joint Motion for Adoption of Partial Settlement Agreement filed by PG&E the Public Advocates Office at the Commission ("Cal Advocates") and California Community Choice Association ("CalCCA") (May 7, 2026).

[4] A.24-11-007, PG&E Application at 1, 8.

In proposed Electric Rule 30, PG&E categorized the grid upgrades necessary to interconnect retail transmission-level customers as Facility Type 1, 2, 3, and 4. Costs for Facility Type 1 are typically recovered under CPUC jurisdiction (*i.e.* through PG&E's General Rate Case) and costs for Facility Types 2-4 are typically recovered under FERC jurisdiction (*i.e.* through PG&E's Transmission Owner Tariff Formula rate).[5] PG&E proposed that customers provide upfront funding, with an opportunity for refund after energization, for Facility Type 1-3 projects, which are "facilities generally needed to interconnect a new customer facility."[6] For Facility Type 4, which include "upgrades to the existing transmission system that may be needed to accommodate the new transmission-level customer's load," customers would not provide upfront funding, but would instead contribute to these projects through retail transmission rates. This proposal was in line with CPUC, FERC, and court precedent which require that projects designed to support the broader grid are recovered through rates.[7]

On March 11, 2025, Commission President Reynolds issued the *Assigned Commissioner's Scoping Memo and Ruling on Pacific Gas and Electric Company's Request to Implement a New Electric Rule 30 Tariff* ("Scoping Memo"). Among the issues in the Scoping Memo were "cost causation," the "jurisdictional split between FERC and CPUC costs for these transmission-level load interconnections," "allocat[ion of] the cost of new transmission-level infrastructure between existing ratepayers and the transmission-level applicant," and "the process and timeline for adding costs … to the ratebase."[8]

On November 21, 2025, ALJ Toy issued the *Administrative Law Judge's Ruling*

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[5] Whether an electric transmission facility is under FERC or Commission jurisdiction for the purposes of cost recovery is determined based on whether the facility: (1) is under CAISO operational control; and (2) has any degree of integration into the transmission network. *See Cal. Dep't. of Water Res. v. FERC*, 489 F.3d 1029, 1037 (9th Cir. 2007); *Pacific Gas and Electric Company*, Opinion No. 466-B, 108 FERC ¶ 61,297 (2004), at 62,512.

[6] A.24-11-007, PG&E Application at 9.

[7] *See* PG&E Limited Opening Post-Hearing Brief (May 8, 2026) at 11-15 (citing cases).

[8] Scoping Memo at 6-7.

*Suspending Proceeding Schedule*.

On January 9, 2026, ALJ Toy issued the *Administrative Law Judge's Ruling Establishing Proceeding Schedule*. In this order, ALJ Toy ordered parties to submit testimony regarding whether and how Facility Type 4 costs should be allocated directly to individual retail customers.[9]

On August 7, 2026, ALJ Toy issued the *Ruling Seeking Comments on Proceeding Status* ("Order Reopening Record") seeking comments regarding the FERC OSC. The Order Reopening Record states that "[f]ollowing the submittal of reply comments, the record will be submitted." On August 24, 2026, ALJ Toy issued an order extending the time to file comments. Parties filed opening comments on September 9, 2026 and reply comments on September 21, 2026. In opening comments, numerous parties addressed the need for coordination between Electric Rule 30 and the FERC OSC. The Public Advocates Office at the Commission ("Cal Advocates") noted Electric Rule 30 should "complement[] the proposed *pro forma* agreement put forward by FERC" and that there may need to be a mechanism to "use the Rule 30 agreement as a substitute for the FERC proposed *pro forma* agreement at CAISO to avoid duplicative requirements."[10] The Utility Reform Network ("TURN") asserted that "any Rule 30 outcome should include a coordination mechanism for future FERC/CAISO tariff developments."[11] The National Resources Defense Council ("NRDC") commented that "the Commission … should ensure that Rule 30 aligns with likely future actions by CAISO."[12]

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[9] *Administrative Law Judge's Ruling Establishing Proceeding Schedule* (Jan. 9, 2026).

[10] Cal Advocates Opening Comments at 4-5.

[11] TURN Opening Comments at 2.

[12] NRDC Opening Comments at 7.

## B. FERC OSC

On October 23, 2025, the Secretary of Energy directed FERC to initiate a rulemaking concerning the interconnection of large loads (the "Advance Notice of Proposed Rulemaking" or "ANOPR").[13] The ANOPR urged FERC to develop a rulemaking to address, among other things, study procedures, flexible interconnection, co-located facilities, and assignment of costs for large load customers.[14]

On June 18, 2026, FERC issued the OSC to the CAISO and each of the 24 PTOs within the CAISO region, including PG&E.[15] The OSC identifies roughly 60 deficiencies in the CAISO Tariff and the individual TO tariffs, including PG&E's TO Tariffs, relating to large load customers. These deficiencies can be categorized into issues regarding: large-load application, study, and operational framework; reliability and real-time operational safeguards; cost transparency and cost-shift protections; co-location, behind-the-meter generation, flexible load, and electrically proximate load rules; and failure to require evaluation of innovative/lower-cost alternatives. Under the OSC, the CAISO and PTOs are required to either demonstrate why their respective tariffs remain just and reasonable or explain what changes are necessary to remedy these tariffs.

On August 12, 2026, the CAISO published a straw proposal (the "Straw Proposal") regarding its intended changes to its tariff. On September 2, 2026, 28 stakeholders, including the Commission and five parties to this proceeding – PG&E, the Public Advocates Office at the Commission, California Community Choice Association, Google, LLC, and the Independent Energy Producers Association – submitted comments in response to the Straw Proposal.

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[13] *Interconnection of Large Loads to the Interstate Transmission System*, Docket No. RM26-4-000, Notice Inviting Comments (Oct. 27, 2025).

[14] ANOPR at 10-14.

[15] *See* Order Instituting Proceeding Under Section 206 of the Federal Power Act ("OSC"), Docket No. EL26-71-000.

FERC has granted the CAISO and PTOs an abeyance to respond to the OSC, and has required CAISO and the PTOs to provide proposed tariff revisions by November 16, 2026.[16] To propose tariff revisions, PG&E, the other PTOs, and the CAISO will submit filings under Section 205 of the Federal Power Act. Under Section 205, FERC must address PG&E's filing within 60 days of its submission.[17]

Among the deficiencies identified in the OSC, the deficiencies concerning cost shifting are relevant to the final resolution of Electric Rule 30. Specifically, FERC has determined that PG&E's TO tariff "lack[s] adequate mechanisms to mitigate the risk of cost shifting among transmission customers, which may result in unjust and unreasonable rates for transmission service."[18] FERC has also expressed "concern[] about the apparent lack of a *pro forma* cost recovery agreement between CAISO, the relevant transmission owner, and the Eligible Customer taking transmission service on behalf of large loads that help ensure that Eligible Customers bear the risk and are ultimately responsible for costs incurred to provide transmission service including the cost of network upgrades."[19]

### C. Relevant Legislation

In the 2026 legislative session, the California legislature passed and Governor Newsom signed at least three bills that direct the Commission to take certain actions which could impact proposed Electric Rule 30.[20] These bills are effective on January 1, 2027, and the Commission will need to consider whether their requirements need to be reflected in Electric Rule 30 or in another proceeding.

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[16] *California Indep. Sys. Operator Corp., et al.*, 196 FERC ¶ 61,131 (2026).

[17] 16 U.S. Code § 824d(d)-(e).

[18] OSC ¶ 65.

[19] *Id.* ¶ 76.

[20] In addition to the bills set forth, *infra*, four other bills will impact large load customers, but do not appear to impact Electric Rule 30: Assem. Bill No. 1577 (2025-2026 Reg. Sess.); Assem. Bill No. 2469 (2025-2026 Reg. Sess.); Assem. Bill No. 2619 (2025-2026 Reg. Sess.); Sen. Bill No. 887 (2025-2026 Reg. Sess.).

First, Senate Bill ("SB") 886 directs the Commission to, on or before January 1, 2028, "establish a tariff for the interconnection of a participating customer[21] seeking to receive retail electric service at the transmission level."[22] This tariff must, under SB 886, include certain provisions for cost responsibility, refunds, and termination fees.[23]

Second, Assembly Bill ("AB") 2383 requires the Commission to establish a "transmission … service tariff" that is "consistent with" the terms of SB 886.[24] AB 2383 also requires the Commission to establish a generation service tariff that ensures "participating customers" "pay[] for those incremental generation cost increases resulting" from the customers' load.

Third, SB 1168 "require[s] the [C]ommission to assess opportunities for rate structures to ensure data centers pay a reasonable share of their costs associated with transmission and distribution needs, ensure that data centers pay for their proportionate share of load increases and procurements needed to reliably serve their loads while maintaining consistency with the applicable integrated resource planning requirements, and alleviate cost pressures on residential ratepayers."[25]

## II. THE COMMISSION SHOULD HOLD ELECTRIC RULE 30 IN ABEYANCE

The Commission "may, with propriety, find it is efficient for its own docket and the fairest course for the parties to enter a stay of an action before it, pending resolution of independent proceedings which bear upon the case."[26] Where a federal regulatory body is

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[21] Assem. Bill No. 2383 (2025-2026 Reg. Sess.) ("AB 2383") defines a "participating customer" as a "data center tariffed pursuant to" this bill.

[22] Sen. Bill No. 886 (2025-2026 Reg. Sess.) ("SB 886") at 945.2, 945.3.

[23] *Id.* at 945.3(a)(3)-(5).

[24] AB 2383 at 945.4.

[25] Sen. Bill No. 1168 (2025-2026 Reg. Sess.) ("SB 1168").

[26] *Mediterranean Enters. v. Ssangyong Corp.* 708 F.2d 1458, 1465 (9th Cir. 1983) (quoting *Leyva v. Certified Grocers of Cal., Ltd.*, 593 F.2d 857, 864 (9th Cir. (1979)).

considering similar issues, this Commission has repeatedly determined it is appropriate to hold a proceeding in abeyance, in the interest of efficiency and to ensure regulatory alignment. For example, the Commission stayed an application by DCR Transmission, LLC in which DCR also filed a related FERC Section 205 filing, as the Commission determined "it would be inefficient for two public agencies to address the same issues simultaneously."[27] To avoid inefficiency and the "potential for the two regulatory bodies to reach conflicting positions," the Commission "suspend[ed] the proceeding activities until the conclusion of the FERC Section (§) 205 rate case."[28]

Similarly, the Commission has stayed or postponed consideration of applications where the findings of a parallel federal regulatory or court proceeding would impact resolution of those applications.[29] "[A]waiting the court decision may … provide guidance that facilitates action by this Commission."[30]

Electric Rule 30 may be impacted by two events that are likely to be resolved in January 2027. First, PG&E must, by November 16, 2026, file a Section 205 filing at FERC to revise its TO tariff. FERC must address this filing by January 2027.[31] This filing will, among other things, address FERC's stated concerns regarding cost shifting among transmission customers, as set forth in the OSC. Second, three California bills that address large load customers take effect on January 1, 2027. Holding this proceeding in abeyance until these two issues are resolved, will allow the Commission to consider their impact –

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[27] *Administrative Law Judge's Ruling Suspending Proceeding Activities Pending Action by the Federal Energy Regulatory Commission*, A.16-10-012 (Mar. 04, 2024) at 2.

[28] *Id.* at 2-3.

[29] *See Application of Los Angeles Cellular Tel. Co. for A Certificate of Pub. Convenience & Necessity to Provide Cellular Radiotelephone Serv. in the Greater Los Angeles Metro. Area*, D.86-06-058, 21 CPUC 2d 285 ((June 25, 1986) (holding proceeding in abeyance pending Federal Communications Commission decision); *Application of North County Communications Corp. of California (U5631c) for Approval of Default Rate for Termination of Intrastate, IntraMTA Traffic Originated by CMRS Carriers.*, D.10-06-006, 2010 WL 2543043, at *9 (similar).

[30] *North County*, 2010 WL 2543043, at *9.

[31] 16 U.S. Code § 824d(d)-(e).

and will provide an opportunity for parties to comment. This short stay will ensure the Commission can establish a regulatory framework that is lasting and will not conflict with federal or state law. Doing so will be "efficient for [the Commission's] docket and the fairest course for the parties."[32]

### A. Staying Electric Rule 30 Will Enable Parties to Address and the Commission to Consider the Impact of the OSC and PG&E's Revised TO Tariff

To avoid the possibility of inconsistent cost responsibility approaches, the Commission should hold this proceeding in abeyance until PG&E's revised TO tariff is final and effective. The FERC OSC and Electric Rule 30 both intend to address certain aspects of cost responsibility for the network upgrades necessary to interconnect retail large load customers. Specifically, the OSC requires PG&E to establish "adequate mechanisms to mitigate the risk of cost shifting among transmission customers."[33] Electric Rule 30 proposes to "efficiently and uniformly interconnect new retail electric customers using cost allocation rules that are just and reasonable for both new customers, as well as PG&E's existing customers."[34] The result here is that two regulatory bodies are concurrently attempting to address the issue of how costs necessary to support the influx of large load customers can be allocated to ensure costs are not shifted to other customers. The input of PG&E's state and federal regulators is welcome, but this parallel effort should promote regulatory certainty while avoiding inconsistency and confusion. Inconsistency among regulations would likely result in uncertainty and turmoil in the market. It is critical that

[32] *Mediterranean Enters. V. Ssangyong Corp.*, 708 F.2d at 1465 (9th Cir. 1983).

[33] OSC ¶ 65.

[34] A.24-11-007, PG&E Application at 6.

the Commission temporarily stay the Electric Rule 30 proceeding until the FERC OSC process is complete to avoid this.

The OSC is intended to resolve issues that are broader and are "upstream" of Electric Rule 30. Specifically, the FERC OSC requires PG&E to revise its TO tariff to prevent cost shifting, and expressly requires a "*pro forma* cost recovery agreement between CAISO, the relevant transmission owner, and the Eligible Customer taking transmission service on behalf of large loads."[35] Within the CAISO, an "Eligible Customer" is almost always a utility.[36] In practice, this means PG&E must establish a cost recovery framework that is "upstream" of the Electric Rule 30 framework,[37] which outlines cost recovery between PG&E as a utility and the retail customer. Regulations, like rivers, flow downstream, so establishing a "downstream" regulation first introduces a greater risk of inconsistency.[38]

As to scope, FERC issued the OSC to the CAISO and each of the 24 PTOs within the CAISO region.[39] It similarly issued five related orders to show cause to the other independent system operators and regional transmission operators (ISOs/RTOs).[40] In practice, this means that FERC will need to address cost responsibility frameworks for each PTO in the CAISO region in a manner that is workable.[41] The CAISO in its Straw Proposal

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[35] OSC ¶ 76.

[36] *See id.* ¶ 3 n.12 (citing CAISO definition of Eligible Customer).

[37] *See, e.g.*, Commission Comments on the CAISO Straw Proposal (Sept. 2, 2026) (repeatedly describing aspects of the OSC response as "upstream"), available at: <https://stakeholdercenter.prod.caiso.com/Comments/AllComments/43a11ec9-fe21-4255-bb1c-336ad3703845#org-44e8e616-d17d-4636-9810-76f9b958b592> (accessed Sept. 25, 2026).

[38] *Id.* (CAISO tariff revisions could "minimize coordination overhead by allowing upstream changes to simply flow down").

[39] *See* OSC.

[40] *See PJM Interconnection, L.L.C.*, 195 FERC ¶ 61,211 (2026); *Midcontinent Indep. Sys. Operator, Inc.* 195 FERC ¶ 61,212 (2026); *Southwest Power Pool, Inc.* 2026 FERC LEXIS 849*, 195 FERC ¶ 61,213 (2026); *ISO New England Inc.*, 195 FERC ¶ 61,215 (2026); *N.Y. Indep. Sys. Operator, Inc.*, 195 FERC ¶ 61,216 (2026).

[41] FERC granted the motions to rescind the OSC for six Southern California cities and the Western Area Power Administrator. *See California Indep. Sys. Operator Corp., et al.*, 196 FERC ¶ 61,131 (2026).

noted the need for PTOs to establish cost responsibility frameworks that are consistent.[42] Multiple stakeholders echoed the CAISO's remarks in their comments on the CAISO Straw Proposal.[43] As a result, PG&E will need to coordinate on its revised TO tariff with the CAISO and the other PTOs within the CAISO region – and FERC may consider how any cost recovery proposals interact with proposals in response to the other five orders to show cause as well. Additionally, each of the six order to show cause proceedings are on the same timeline, with each of the six ISOs/RTOs, and nearly every PTO in each region, set to file Section 205 applications to revise their tariffs on November 16, 2026. Seeking to disrupt that process and timeline is impractical.

By contrast, PG&E's application for approval of Electric Rule 30 addresses only PG&E. A short stay of this proceeding impacts only PG&E and large load retail customers within its service territory. While that impact should not be minimized, it is on a considerably smaller scale than the FERC OSC process. Allowing the broader proceedings to be resolved first (likely by January 2027) before finalizing Electric Rule 30 is the surest path to a clear regulatory framework.

### B. Staying Electric Rule 30 Will Provide Opportunities to Address and Consider the Impact of New Legislation

In addition to the FERC OSC, the Commission will at least need to consider whether new legislation may impact Electric Rule 30. SB 886, SB 1168, and AB 2383 all require the Commission to implement regulations, applicable to all jurisdictional utilities,

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[42] CAISO Large Load Considerations Straw Proposal (Aug. 11, 2026) at 6 ("the PTOs [should] develop consistent tariff policies"), available at: file:///C:/Users/j15c/AppData/Local/Temp/MicrosoftEdgeDownloads/50fad721-036f-4aa9-baaf-64f195527a5a/Large-loads-Straw-Proposal-Aug-11-2026.pdf (accessed Sept. 25, 2026).

[43] *See, e.g.*, Southern California Edison Comments on Straw Proposal (Sept. 2, 2026); State Water Contractors Comments on Straw Proposal (Sept. 2, 2026) (emphasizing the need for coordination "so that transmission customers are not exposed to inconsistent cost allocation outcomes depending on which PTO territory a given large load happens to interconnect in").

addressing large load customers. In particular, SB 886 requires the Commission to "establish a tariff for the interconnection of a participating customer seeking to receive retail electric service at the transmission level," specifying certain requirements addressing disclosure of duplicative applications, cost responsibility, refunds for advanced costs, and early termination fees.[44] This tariff would need to apply to all CPUC-jurisdictional utilities.[45]

To date, parties have not had the opportunity to comment on whether proposed Electric Rule 30 is consistent with this legislation or whether any revisions are necessary for compliance. Finalizing Electric Rule 30 now without the opportunity to consider and address this legislation will be inefficient, requiring further proceedings that will burden the Commission and the parties. Holding final resolution of Electric Rule 30 in abeyance for a few months to allow FERC to address the OSC – and for parties to address California legislation – will allow for the Commission to create a lasting regulatory structure. SB 886 does not require implementation until January 1, 2028[46] so staying Electric Rule 30 for a short period does not imperil that deadline.

### C. A Stay Will Not Delay Resolution of Related Issues

Importantly, a stay would not impact resolution of the Partial Settlement Agreement. This Partial Settlement Agreement concerns issues regarding information sharing, reporting, and coordination of service among applicable load serving entities. Its provisions are not impacted by the OSC or new legislation. Indeed, as CalCCA noted in its opening comments in response to the Order Reopening Record, approval of the Partial Settlement Agreement is necessary to ensure CalCCA's constituents and PG&E's energy procurement division have sufficient access to information to serve retail customers.[47]

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[44] SB 886 at 945.3(a).

[45] *Id.*

[46] *Id.* at 945.2(a).

[47] *See generally* CalCCA Opening Comments.

Accordingly, the Commission should approve the Partial Settlement Agreement without further delay.

Apart from the Partial Settlement Agreement, staying Electric Rule 30 would not impact the Commission's consideration of exceptional case filings seeking approval of retail transmission-level interconnections under Electric Rules 2, 15, and 16 or customers' ability to use interim Electric Rule 30. While a lasting regulatory framework is established, retail customers still need a pathway to seek approval of clear terms for interconnection in the interim. Customers should not be prejudiced while FERC and the Commission consider a permanent regulatory framework.[48]

## III. CONCLUSION

For the reasons stated above, PG&E respectfully requests that the Commission hold this proceeding in abeyance until PG&E's revised TO tariff is final and effective. Within ten (10) business days after PG&E's revised TO tariff is final and effective, PG&E will notify the Commission.

Prior to the date of this filing, PG&E reached out to every party to this proceeding and met and conferred with the Alliance for Retail Energy Markets ("AReM"), Cal Advocates, CalCCA, California Coalition of Large Energy Users ("CLEU"), the California Large Energy Consumers Association ("CLECA"), Google LLC ("Google"), National Resource Defense Council ("NRDC"), Shell Energy, Sierra Club, and The Utility Reform Network ("TURN"), to discuss this motion. The following parties provided their position on PG&E's motion:

Google and CLECA support the motion. CLECA stated: "CLECA supports holding the proceeding in abeyance, provided the motion clarifies that, during the stay, Interim Rule 30's special-exception provision will remain available to existing customers adding incremental transmission-level load to decarbonize, electrify, or support electric-vehicle

[48] *See, e.g.*, OSC ¶ 5 (PTOs should "propose a reasonable implementation period to ensure minimal disruption to such existing commercial arrangements").

charging, or existing EITE facilities adding load to modernize or expand their California operations. CLECA's support does not extend to the motion's request for approval of the Partial Settlement insofar as the Partial Settlement would authorize disclosure of confidential, customer-specific interconnection information to Sierra Club."NRDC and Sierra Club oppose the motion.

AReM and CalCCA take no position on the motion.

Cal Advocates stated that it "will not be providing its position prior to PG&E filing its motion."

Respectfully Submitted,

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