

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Application of Pacific Gas and Electric
Company for Authority, Among Other
Things, to Increase Rates and Charges for
Electric and Gas Service Effective on
January 1, 2027 (U 39 M)

Application 25-05-009

**COMMENTS OF THE PUBLIC ADVOCATES OFFICE
ON PROPOSED DECISION AUTHORIZING INTERIM RATE RECOVERY**

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TABLE OF CONTENTS

	<u>Page</u>
TABLE OF AUTHORITIES	ii
I. INTRODUCTION	1
II. DISCUSSION.....	2
A. The Proposed Decision Commits Legal Error Because it Applies an Incorrect Legal Standard.	2
1. PG&E’s IRR request fails to show a “need and urgency” for a premature ratepayer funded rate increase.	6
2. PG&E’s IRR request fails to demonstrate how a premature ratepayer-funded rate increase is necessary for “fairness to both the utility and the public.”	6
B. The PD Commits Factual and Legal Error in Relying on <i>TURN v. CPUC</i> Because the Facts of that Case are Inapposite to the Facts in PG&E’s IRR Request.	8
C. The Proposed Decision Contains a Technical Error on Page 13.	11
III. CONCLUSION	11
APPENDIX A	

TABLE OF AUTHORITIES

Page(s)

Cases

TURN v. Pub. Util. Comm’n, 44 Cal.3d 870, 880 (1988) Passim

California Public Utilities Code

Section 451 Passim

Section 454 Passim

Commission Decisions

D.78441 Passim

D.78665 Passim

D.92496 Passim

D.83-05-036..... 1, 3

D.83-12-068..... 9

D.85-12-085..... 9

D.87-06-021 4

D.00-02-046.....Passim

D.03-02-033 4

D.11-05-018..... 6

D.13-10-051 2, 3

D.15-04-021 6

D.18-01-009 6

D.20-10-026..... 7

D.24-09-003 7

Commission Rules of Practice and Procedure

Rule 14.3(a) 1

Rule 14.3(c) 1

I. INTRODUCTION

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) hereby submits the following opening comments on the Proposed Decision Authorizing Interim Rate Recovery (Proposed Decision), pursuant to Rule 14.3(a) of the California Public Utilities Commission’s Rules of Practice and Procedure.¹

The Commission should modify the Proposed Decision to correct factual, legal, and technical errors that result in Pacific Gas and Electric Company (PG&E) receiving an unjust and unreasonable \$456 million ratepayer funded interim rate recovery (IRR).² Specifically, PG&E fails to meet its burden of proof to show that its request is just and reasonable.³ The Proposed Decision commits legal error because it applies the wrong legal standard to conclude that PG&E is entitled to IRR, as discussed in detail below. PG&E neither demonstrates that it is facing a financial emergency nor that its investment costs are indisputably reasonable.⁴ Further, even if the Commission were to use its discretion to grant PG&E IRR under the lower *TURN v. CPUC* standard, PG&E still fails to meet its burden of proof to show that such summary relief is warranted.⁵

The Commission should not force ratepayers, through an IRR, to prepay for costs that may never materialize. Instead, the Commission should wait until there is a full review of PG&E’s \$16.637 billion request for a base revenue requirement increase in the

¹ Proposed Decision Authorizing Interim Rate Recovery, September 23, 2026 (Proposed Decision).

² Proposed Decision, Ordering Paragraph (OP) 1 at 16; Rule 14.3(c).

³ PD, Findings of Fact (FoF) 1, 2 at 38; Public Utilities Code (Pub. Util. Code) Sections 451, 454; Decision (D.)92496 at 2 (“[T]he burden of proof is on the utility applicant to establish the reasonableness of energy expenses sought to be recovered”); D.00-02-046 at 36 (“[N]o public utility shall change any rate . . . except upon a showing before the Commission, and a finding by the Commission that the new rate is justified.”); D.83-05-036 at 2 (“Of course, the burden of proof is on the utility applicant to establish the reasonableness of energy expenses sought to be recovered. We expect a substantial affirmative showing by each utility with percipient witnesses in support of all elements of its application.”).

⁴ Pub. Util. Code Sections 451, 454; D.78665; D.78441.

⁵ Pub. Util. Code Sections 451, 454.

current General Rate Case (GRC).⁶ Such a large IRR to PG&E from ratepayers is especially concerning because PG&E has stated that it is reducing its capital investment projects by \$2 billion (\$1 billion of which is CPUC jurisdictional) in 2027.⁷

II. DISCUSSION

A. The Proposed Decision Commits Legal Error Because it Applies an Incorrect Legal Standard.

Generally, under Public Utilities Code Sections 451 and 454, the Commission may not grant any increase for investment-related costs, such as IRR, prior to a final determination that the larger costs at issue are reasonable and prudent.⁸ The Commission has however acknowledged exceptions to this general rule; when a utility faces a “financial emergency” or when the utility “investment costs are indisputably reasonable.”⁹

⁶ 2027 General Rate Case Application of Pacific Gas and Electric Company (U 39 M), May 15, 2025 (PG&E 2027 GRC Application).

⁷ PG&E’s Spending Cut Amid Wildfire Liability Dispute is Decried by Watchdog as ‘Blackmail,’ Fewer Power Hookups Loom for Homes, Data Centers, Tech Hubs and Manufacturing Plants, The Mercury News, available at: <https://www.mercurynews.com/2026/09/02/pge-fire-electric-gas-oakland-california-bill-economy-home-build-jobs/> [accessed on October 13, 2026]; See, PG&E Launches Strategic Review to Build a Better, More Affordable Energy Future for California Customers, PG&E Newsroom Press Release, September 2, 2026, available at: <https://www.pge.com/en/newsroom/press-release-details.77a6f479-b055-45f1-bbea-0bea442774c2.html> [accessed on October 13, 2026]; See also, Turning Point For PG&E and California, PG&E Corporation Post Legislative Session Update, September 2, 2026 (PG&E September 2, 2026 Leg Update) at 4, available at: https://s21.q4cdn.com/673114418/files/content_files/PG-E-Post-Legislative-Session-Update-2026.pdf [accessed on October 13, 2026].

⁸ D.13-10-051 at 16 (“[T]he Commission is not permitted to grant any increase for investment-related costs, such as interim rates, prior to a final determination that the costs are reasonable and prudent.”); *S. Cal. Gas Co. v. Pub. Util. Comm’n*, 50 Cal. 3d 31, 35, (1990) (“A utility may recover all costs which the commission determines to be reasonable and prudent by adjusting rates paid by its customers. If the commission determines that any costs were not reasonably incurred, it orders the utility to make an adjustment to reduce rates prospectively or make a refund to its ratepayers”).

⁹ See, D.13-10-051 at 20, where the Commission denied interim rate relief to a utility for failure to meet its burden of proof (“We have, at times, granted interim rate relief in advance of the required findings in situations where utility’s request for rate relief was accompanied by a showing of a financial emergency or where the utility’s investments costs are indisputably reasonable. In this case, Kerman’s request is not based on financial emergency”); See also, D.78665, where the Commission denied an interim rate increase upon finding no financial emergency; D.78441.

Here, PG&E does not claim that it needs IRR because it is experiencing a financial emergency or that its request is indisputably reasonable.¹⁰ Instead, PG&E states that the Commission should use its discretion under another exception to Public Utilities Code Sections 451 and 454, enumerated by the California Supreme Court in *TURN v. CPUC* and discussed in more detail below, to provide IRR relief up to and above \$1 billion.¹¹ In response to PG&E’s request, the Proposed Decision erroneously grants PG&E an unjust and unreasonable \$456 million ratepayer funded IRR.¹² The Proposed Decision states that PG&E’s IRR request is “just and reasonable” because the request “is subject to refund and sufficiently justified.”¹³ This is not an appropriate legal standard; a rate increase does not become reasonable as a result of action the Commission may take after it has already approved the rates.¹⁴ Rather, it must be found reasonable based on facts before the Commission before the rates are approved.¹⁵ A rate increase that is based on the fact that PG&E claims the increase is “subject to refund” is not sufficient to meet PG&E’s burden of proof. PG&E must show that the rate request is just and reasonable under the Public Utilities Code.¹⁶ The Commission has defined reasonable to mean “that at a particular time any of the practices, methods and acts engaged in by the utility follows the exercise of reasonable judgement.”¹⁷ In addition, to determine if PG&E’s

¹⁰ D.13-10-051; D.78665; D.78441.

¹¹ Motion of Pacific Gas and Electric Company (U 39 M) for Interim Rate Recovery, May 7, 2026 (PG&E IRR Motion) at 1, 3.

¹² Proposed Decision at 10, 12.

¹³ Proposed Decision at 10.

¹⁴ D.92496 at 2 (“[T]he burden of proof is on the utility applicant to establish the reasonableness of energy expenses sought to be recovered”); D.00-02-046 at 36 (“[N]o public utility shall change any rate . . . except upon a showing before the Commission, and a finding by the Commission that the new rate is justified.”); D.83-05-036 at 2 (“Of course, the burden of proof is on the utility applicant to establish the reasonableness of energy expenses sought to be recovered. We expect a substantial affirmative showing by each utility with percipient witnesses in support of all elements of its application.”).

¹⁵ D.92496 at 2; D.00-02-046 at 36; D.83-05-036 at 2.

¹⁶ Pub. Util. Code Section 451.

¹⁷ Pub. Util. Code Section 451; D.03-02-033 at 4-5 (“In Decision (D.) 87-06-021, we defined reasonable to mean that at a particular time any of the practices, methods, and acts engaged in by a utility follows the exercise of reasonable judgment in light of facts known or which should have been known at the time the

request is “justified,” it is important to specifically identify what facts in PG&E’s request make it “justified” so as to understand the standard the Commission is using to replace or supplement the existing law.¹⁸ The Proposed Decision does not identify which facts make PG&E’s request justified, so the standard the Commission is applying remains unclear.

The applicable legal standard, established in *TURN v. CPUC*, is that a utility’s IRR request is “just and reasonable” if the facts are such that they, in “*fairness to both the utility and the public required immediate action.*”¹⁹ (Emphasis Added). Thus, under *TURN v. CPUC*, IRR requires a utility to show: (1) a need for *immediate action* (or in other words a *need and urgency* and not merely a net benefit), as well as (2) *fairness to both the utility and the public*. The Proposed Decision disagrees. It erroneously contends that a showing of urgency or extraordinary circumstances is not needed to authorize IRR.²⁰ This statement is legally flawed as shown below.

The Proposed Decision’s contention-is the result of a flawed analysis of *TURN v. CPUC*.²¹ Specifically, the contention appears to be based on the concluding paragraph in *TURN v. CPUC* which states, “We conclude that the [C]ommission had authority to determine that the interim rate increases, subject to refund, prescribed by its decisions of December 18, 1985, and April 16, 1986, are “just and reasonable” (§ 451) and “justified”

decision was made. The act or decision is expected by the utility to accomplish the desired result at the lowest reasonable cost consistent with good utility practices. Good utility practices are based upon cost effectiveness, reliability, safety, and expedition. A reasonable act is not limited to the optimum practice, method, or act to the exclusion of all others, but rather encompasses a spectrum of possible practices, methods, or acts consistent with the utility system need, the interest of the ratepayers and the requirements of governmental agencies of competent jurisdiction.”).

¹⁸ D.00-02-046 at 36 (“[N]o public utility shall change any rate . . . except upon a showing before the Commission, and a finding by the Commission that the new rate is justified.”).

¹⁹ Proposed Decision at 5; *TURN v. Pub. Util. Comm’n*, 44 Cal.3d at 879 (“In the present case, the commission was not faced with an ‘emergency’ in the sense of a threat to the utility’s survival, but the situation was one in which fairness to both the utility and the public *required immediate action.*” (Emphasis Added)).

²⁰ Proposed Decision at 10.

²¹ Proposed Decision at 10.

(§ 454, subd. (a)).”²² However, the Proposed Decision fails to acknowledge that this sentence was premised on the antecedent fact that “the situation was one in which fairness to both the utility and the public required immediate action.”²³ Specifically, the *TURN v. CPUC* Court found that PG&E had met its burden of proof and shown that immediate IRR was necessary and fair to both the utility and the public because: (1) a major new power plant that was the subject of the IRR represented a substantial part of the utility’s capital investment; (2) the new plant’s operation would result in savings; and (3) a considerable period of time was expected to elapse before final determination of the prudence of the utility’s investment in the new plant.²⁴ Therefore, *TURN v. CPUC* requires a showing that a utility’s IRR request is "just and reasonable" and "justified," which requires a utility to show “need and urgency” as well as “fairness to both the utility and the public”²⁵ before the Commission may exercise its discretion to approve such a request.

Based on an application of the correct legal standard, the Commission must revise the Proposed Decision and deny PG&E’s request for IRR because PG&E fails to meet its burden of proof.²⁶

²² *TURN v. Pub. Util. Comm’n*, 44 Cal. 3d at 880.

²³ *TURN v. Pub. Util. Comm’n*, 44 Cal. 3d at 879.

²⁴ *TURN v. Pub. Util. Comm’n*, 44 Cal.3d at 876.

²⁵ *TURN v. Pub. Util. Comm’n*, 44 Cal.3d at 879

²⁶ *TURN v. Pub. Util. Comm’n*, 44 Cal.3d at 879; Pub. Util. Code Sections 451, 454.

1. PG&E’s IRR request fails to show a “need and urgency” for a premature ratepayer funded rate increase.

PG&E’s fails to meet its burden of proof to show that its request for IRR is “urgent and needed.” In particular, PG&E fails to identify an operational need for IRR to fund projects that have yet to be approved. Nor has PG&E identified any concrete, time-sensitive harm to either customers or the utility that cannot be adequately addressed through the GRC where a final Decision is expected in May 2027.²⁷ The core rationale of applying interim rates is to prevent harm from a delay, which PG&E has not shown.²⁸

Therefore, as PG&E has failed to meet its burden of proof in demonstrating a need and urgency for a premature interim rate increase, the Commission should deny PG&E’s IRR request and require PG&E to wait until a final Decision to the current GRC is adopted in May 2027.²⁹

2. PG&E’s IRR request fails to demonstrate how a premature ratepayer-funded rate increase is necessary for “fairness to both the utility and the public.”

The Proposed Decision errs in granting PG&E IRR even under its incorrect legal standard that only requires PG&E to show, by a preponderance of the evidence, that the IRR provides “fairness to both the utility and the public.”³⁰ The Commission has ruled that the “fairness to both the utility and the public” requirement can be met by any one of the following factors: promote fairness to both the utility and the public; reduce the

²⁷ *Assigned Commissioner’s Scoping Memo and Ruling*, July 31, 2025 (PG&E 2027 GRC Scoping Ruling) at 19.

²⁸ *See*, PG&E IRR Motion.

²⁹ *See*, PG&E 2027 GRC Scoping Ruling at 19.

³⁰ D.15-04-021; *People v. Garcia* (1975) 54 Cal.App.3d 61, 69 (preponderance is “such evidence as, when weighed with that opposed to it, has more convincing force and the greater probability of truth.”); D.18-10-019 at 31 (Preponderance of the evidence in ratesetting proceedings means that “the applicant must present more evidence that supports the requested result than would support an alternative outcome.”). *See also*, D.18-01-009 at 9 (the “Commission has applied the preponderance of the evidence standard since the inception of the ERRRA proceeding process...”); D.11-05-018 at 68 (“[T]he Commission has held that the standard of proof the applicant must meet is that of a preponderance of the evidence...”).

potential for rate shock; preserve the financial integrity of the utility, minimize costs incurred by ratepayers, ensure rate stability; and smooth rate impacts on customers.³¹

The Proposed Decision states that, “we are persuaded by PG&E that interim rate relief is appropriate, specifically to *smooth rates* and *alleviate potential rate shock*.”³² (Emphasis Added). The Proposed Decision further states, “Given the need to ensure *stability of rates*, we partially grant the IRR Motion.”³³ (Emphasis Added). The Proposed Decision claims that, “The timing of the instant decision, in advance of the Annual Electric True-up Advice Letter, would allow implementation of the interim rate relief in the winter season to avoid the potential of layered rate increases in the summer months, when total customer bills are typically higher.”³⁴ The Proposed Decision is incorrect.

As Cal Advocates shows in its response to PG&E’s IRR motion, PG&E’s claim that interest savings of a mere \$14 to \$21 million would smooth customer rates and reduce rate volatility is speculative at best, relies on a questionable assumption, and is de minimis.³⁵ Specifically, even if the Commission were to assume that PG&E’s estimated interest savings are accurate, the average residential bill impact would see a reduction of only 10 to 15 cents per month.³⁶ In contrast, Cal Advocates estimates that due to the 2027 GRC and other cost recovery requests, the average customer bill could increase by \$37/month in 2027 and by \$70/month in 2030.³⁷ Thus, the magnitude of any estimated potential benefit to individual customers is trivial relative to the rate increase requested as part of this GRC and other PG&E requests.

³¹ PG&E IRR Motion at 5-6; Proposed Decision at 10-11; D.20-10-026; D.24-09-003 at 7-8.

³² Proposed Decision at 11.

³³ Proposed Decision at 12.

³⁴ Proposed Decision at 10.

³⁵ Cal Advocates Response to PG&E IRR Request at 6; PG&E IRR Motion at 7.

³⁶ Cal Advocates Response to PG&E IRR Request at 6.

³⁷ Cal Advocates Response to PG&E IRR Request at 6; See also, The Public Advocates Office, The Full Bill Impact of PG&E’s Expected Rate Requests, March 5, 2026, at 3, available at: <https://www.publicadvocates.cpuc.ca.gov/-/media/cal-advocates-website/files/press-room/reports-and-analyses/260305-public-advocates-office-pge-revenue-requests-fact-sheet.pdf>

Moreover, PG&E's claim that IRR would smooth rates and reduce rate volatility is speculative hyperbole.³⁸ Not only is PG&E asking ratepayers to pre-pay for costs that may never materialize, but PG&E's own calculations show ratepayers will only receive a 2-3% rate benefit in January 2027 and almost no rate benefit by September 2028.³⁹ While rate smoothing is a general policy preference, the Commission should reject PG&E's hyperbolic rate smoothing arguments as a sufficient basis for a \$456 million premature increase in IRR, especially as ratepayers are currently facing a severe affordability crisis.

Therefore, even under the Proposed Decision's incorrect and lower legal standard, PG&E fails to demonstrate, by a preponderance of the evidence, that the circumstances in this case warrant IRR from California ratepayers.

B. The PD Commits Factual and Legal Error in Relying on *TURN v. CPUC* Because the Facts of that Case are Inapposite to the Facts in PG&E's IRR Request.

The Proposed Decision states that, "[I]nterim rate recovery is not, and should not be, routine" but then erroneously approves PG&E's request for IRR based on the Commission's discretion alone.⁴⁰ This reasoning is internally inconsistent and the Proposed Decision is arbitrary and capricious because the Commission's discretion is a routine element of all Commission decisions or decision making. The Court in *TURN v. CPUC* did not uphold the Commission's Decision that granted PG&E IRR based on Commission discretion alone but rather because the Commission exercised its discretion based on facts that showed "fairness to both the utility and the public required immediate action."⁴¹ Thereby, the Court recognized the Commission's discretion is justified when

³⁸ Cal Advocates Response to PG&E IRR Request at 7; PG&E IRR Motion at 7-10.

³⁹ Cal Advocates Response to PG&E IRR Request at 8; PG&E IRR Motion at 8.

⁴⁰ Proposed Decision at 5; *TURN v. Pub. Util. Comm'n*, 44 Cal.3d at 879 ("In the present case, the commission was not faced with an 'emergency' in the sense of a threat to the utility's survival, but the situation was one in which fairness to both the utility and the public *required immediate action*." (Emphasis Added)).

⁴¹ *TURN v. Pub. Util. Comm'n*, 44 Cal.3d at 879.

the Commission finds “fairness to both the utility and the public requires immediate action” as an exception to the statutory requirement that rates must be reasonable before they are approved. The Commission has no discretion to grant premature rate recovery in any manner that is inconsistent with Pub. Utils. Code §454 in the exercise of its discretion.

While the Proposed Decision is correct that the Commission has the authority to set interim rates under *TURN v. CPUC*, the Commission is not *required* to provide IRR and cannot do so in an arbitrary and capricious fashion. Here, the facts in PG&E’s IRR request are significantly different and distinguishable from the facts in *TURN v. CPUC* and do not warrant the relief PG&E requests.

In *TURN v. CPUC*, the Court upheld the Commission’s December 18, 1985 Decision, Decision (D.)85-12-085, to grant IRR to PG&E to collect and credit PG&E’s Diablo Canyon Adjustment Account, a major-additions adjustment clause (MAAC) account, for the initial operation of Unit 1 of PG&E’s Diablo Canyon Nuclear Power Plant (Diablo Canyon). The Court found that PG&E’s investment in Unit 1 of Diablo Canyon exceeded \$3 billion, a substantial capital investment especially for that time, that had accumulated from 1967 to the commencement of Unit 1’s operations in 1985.⁴² According to D.18-12-085, PG&E’s own estimates showed that interim rates for Unit 1 would result in an imputed rate base of \$1.903 billion, or about 63% of the \$3 billion investment in Unit 1 of Diablo Canyon.⁴³ The \$3 billion investment in Unit 1 represented approximately 41% of PG&E’s rate base at the time.⁴⁴ In addition, the cash flow that would arise out of estimated fuel savings from the operation of Unit 1 was found to reduce PG&E’s cost of raising capital and, more importantly, was not dependent on increased payments from current ratepayers.⁴⁵ Finally, the court ruled the Commission properly anticipated a substantial delay in a final prudency determination

⁴² *TURN v. Pub. Util. Comm’n*, 44 Cal.3d at 873.

⁴³ D.85-12-085 at 7-9.

⁴⁴ See, D.83-12-068, 14 CPUC 2d at 134, 174.

⁴⁵ *TURN v. Pub. Util. Comm’n*, 44 Cal.3d at 876.

because there were still three more phases of the proceeding left for the Commission to resolve remaining cost issues. In effect, the Court acknowledged the Commission's determination of both need and fairness.

In the present case, PG&E has made no showing of need. It doesn't show its cash flow is affected by any delay in issuing the decision for this GRC. PG&E also has not made substantial capital expenditures in the current GRC. Indeed, PG&E seeks Commission authorization for future costs and projects in the GRC, not past capital investments.⁴⁶ The Commission's review of a utility's proposed future costs and investments is a well understood principle of forecast ratemaking.⁴⁷ Unlike the \$3 billion of capital expenditures that PG&E invested in Unit 1 of Diablo Canyon, the costs that are part of the current GRC have not been incurred, are inherently uncertain, and may not occur at all. Further, the Commission may modify, reduce, or fully reject many proposed expenditures under examination in the current GRC.

In addition, PG&E's Motion for IRR claims minimal savings of \$14 to \$21 million out of a \$16.637 billion base revenue requirement, in contrast to *TURN v. CPUC* where the Commission found "substantial fuel savings" of \$300 million annually.⁴⁸ Unlike in *TURN v. CPUC*, where the Court found a IRR was not dependent on increased payments from current ratepayers, Cal Advocates estimates that PG&E's cost recovery requests could increase average customer bills by \$37/month in 2027 and by \$70/month in 2030.⁴⁹

⁴⁶ PG&E 2027 GRC Application.

⁴⁷ See, Ratemaking Fundamentals and Principles, National Association of Regulatory Utilities Commissioners, available at: <https://www.naruc.org/commissioners-desk-reference-manual/3-ratemaking-fundamentals-and-principles/>.

⁴⁸ Cal Advocates Response to PG&E IRR Request at 6; *TURN v. Pub. Util. Comm'n*, 44 Cal.3d at 877, 879.

⁴⁹ *TURN v. Pub. Util. Comm'n*, 44 Cal.3d at 877; Cal Advocates Response to PG&E IRR Request at 6; See also, The Public Advocates Office, The Full Bill Impact of PG&E's Expected Rate Requests, March 5, 2026, at 3, available at: <https://www.publicadvocates.cpuc.ca.gov/-/media/cal-advocates-website/files/press-room/reports-and-analyses/260305-public-advocates-office-pge-revenue-requests-fact-sheet.pdf>

Lastly, a final determination in the current GRC will not take a considerable period of time. Unlike in *TURN v. CPUC*, where Unit 1 of Diablo Canyon took almost three decades for the plant to come into service and there was still three more phases of the proceeding left for the Commission to resolve remaining cost issues, a final Decision in the current GRC is scheduled for next year in May 2027.⁵⁰

Therefore, PG&E's current IRR request and *TURN v. CPUC* are inapposite. The Commission should deny PG&E's request because it does not meet the *TURN v. CPUC* standard where fairness to both the utility and the public requires immediate action.

C. The Proposed Decision Contains a Technical Error on Page 13.

Notwithstanding the above, the final Decision should correct a technical error on Page 13 of the Proposed Decision. In order to avoid any potential confusion, the Commission should replace the statement "we find recovery of 85 percent of the revenue requirement change reasonable" to "we find a reduction of 85% of the requested revenue requirement increase to be reasonable."

III. CONCLUSION

Given the Proposed Decision's legal, factual, and technical errors, the Commission should modify the Proposed Decision and reject PG&E's request for California ratepayers to pay for an unjustified \$486 million increase in revenue requirement via an IRR.

⁵⁰ PG&E 2027 GRC Scoping Ruling at 19; *TURN v. Pub. Util. Comm'n*, 44 Cal.3d at 876.

Respectfully submitted,

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APPENDIX A

Recommended Changes to Conclusions of Law

Proposed additions are underlined; proposed deletions are in ~~strike through~~:

Conclusion of Law:

2. In TURN v. PUC, the California Supreme Court held that ~~the Commission could set interim rates as long as the rate is subject to refund and sufficiently justified~~ a utility's interim rate relief request is "just and reasonable" and "justified" if the facts warrant such relief, such as a situation "in which fairness to both the utility and the public required immediate action."
3. The totality of circumstances does not justify ~~justifies~~ granting interim cost recovery prior to a determination on whether the costs are reasonable.
4. It is not reasonable for the Commission to authorize PG&E to recover, on an interim basis, 55, 75, or 85 percent of its requested combined total \$1.188 billion revenue requirement increase for TY 2027, beginning January 1, 2027, to remain in effect until implementation of a final decision ~~55 percent of PG&E's requested revenue requirement increase for Electric Distribution and Electric Generation, and 85 percent of PG&E's requested revenue requirement decrease for Gas Distribution, and Gas Transmission & Storage.~~
6. ~~The amount authorized for interim rate recovery by this decision is subject to refund, with interest, depending on the final resolution of all outstanding issues in this proceeding.~~