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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Refine the
Risk-Based Decision-Making Framework for
Electric and Gas Utilities

Rulemaking 26-04-016
(Filed April 30, 2026)

**OPENING COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY ON
RAMP SCHEDULE ISSUES (TRACK 1)**

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OPENING COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY ON RAMP SCHEDULE ISSUES (TRACK 1)

Pursuant to the July 20, 2026 “Assigned Commissioner’s Scoping Memo and Ruling,” (Scoping Memo) and the September 21, 2026 “Administrative Law Judge’s Ruling Seeking Party Responses Regarding Track 1 Issues”¹ Pacific Gas and Electric Company (PG&E) submits these comments on Track 1 issues.

I. RESPONSE TO SCOPING MEMO TRACK 1 ISSUES

The Scoping Memo (p. 3) seeks comments on the following Track 1 issues:

Issue 1: Should the Commission modify the Rate Case Plan to allow SPD more time to complete its evaluation of a utility’s RAMP application?

a. Should the structure of the formal schedule allow parties the option to provide informal comments on RAMP filings in addition to formal comments on RAMP filings and SPD evaluation report?

b. Should other schedule and/or process changes be made to the RAMP framework?

Issue 2: Should the Commission require Alpine and WCG to file Risk Spending and Accountability Reports (RSAR) based on the requirements applied to other utilities in Decision (D.) 22-10-002, to create a mechanism for these utilities to comply with California Public Utilities Code section 591?

Response to Issue 1: First, as discussed below, PG&E accepts the Staff’s proposed modified RAMP schedule (extending Staff’s evaluation report by 60 days) with the reservation that a delay in the issuance of the Staff’s RAMP evaluation necessarily reduces the time available for PG&E to incorporate changes into its GRC filing. Furthermore, changes to the overall RAMP and GRC schedule adopted in the active Rate Case Plan (RCP) proceeding² could impact whether Staff’s proposed RAMP Schedule remains reasonable and workable. Accordingly,

¹ The due date for responding to the Track 1 issues identified in the September 21 ruling was revised by the October 1, 2026 “Amended ALJ Email Ruling Amending R.26-04-016 Rulings issued September 21 and 30, 2026.”

² R.26-09-003, Order Instituting Rulemaking to Revise the General Rate Case Plan (RCP Proceeding) for the Energy Utilities.

PG&E’s opinion in these comments on the proposed RAMP Schedule is subject to adjustment based on the outcome of the RCP proceeding.

Second, with respect to Issue 1.a, PG&E agrees that the formal schedule should allow parties the option to provide informal comments on RAMP filings in addition to formal comments on RAMP filings and the SPD evaluation report. PG&E supports the Staff proposal in the September 21 ALJ ruling that provides for informal comments by September 1.

Third with respect to Issue 1.b, PG&E has no further proposed changes to the RAMP schedule.

Response to Issue 2: In the September 21 ALJ Ruling (p. 1), the Commission clarified that “Respondents other than Alpine and WCG need only respond to the questions regarding [modifying the schedule for the Safety Policy Division’s (SPD) evaluations of Risk Assessment Mitigation Phase (RAMP) filings].”) Accordingly, PG&E takes no position on Issue 2.

II. RESPONSE TO THE SEPTEMBER 21 ALJ RULING: STAFF’S PROPOSED CHANGES TO THE RAMP SCHEDULE

The September 21 ALJ Ruling requests comments on the following RAMP schedule proposed by Staff:

Date	Days	Event
Test Year minus 3		
May 15	Day 0	Utility files application to initiate its RAMP proceeding
<i>By September 1</i>	<i>~Day 110</i>	<i>Informal comments on RAMP submission due to SPD and RAMP service list</i>
By ~~September 1~~ <i>October 31</i>	<del>~Day 110</del> ~Day 170	SPD files and serves report on utility’s RAMP submission
By ~~November 15~~ <i>21</i>	<del>~Day 184</del> ~Day 191	Opening comments on RAMP submission and the SPD report
By December 15	~Day 200 ~~205~~	Reply Comments

Specifically, the September 21 Ruling asks:

- a. Should the Commission modify the RAMP schedule as shown in the table above?
 - i. If yes, explain why.
 - ii. If no, identify which modification should not be adopted and explain why.
 - iii. If you have an alternative suggestion, provide that in your response and explain why.

PG&E Response to Staff Proposed Modified Schedule:

PG&E accepts the Staff's proposed modified schedule with the reservation described below. PG&E does not suggest an alternative schedule.

Delaying the SPD evaluation by 60 days – or even longer if further extensions are sought by SPD during the RAMP proceeding – undermines the Commission's stated goal that utilities have sufficient time to meaningfully incorporate SPD feedback into their GRC filing in the following year.³ Changes to risk models, risk value calculations, benefit-cost calculations and related analysis can be complex, resource-intensive, and time-consuming. For this reason, PG&E typically begins preparing its RAMP models and analysis two years prior to filing the RAMP. In order to be incorporated into testimony and workpapers for the GRC filing, risk value and Benefit-Cost calculation results for the GRC must be fully updated, validated, and finalized by February 1, approximately three and a half months before the May 15 GRC filing date. Developing risk model and benefit-cost calculation results for the GRC requires substantial time and effort. This work includes updating units and cost estimates for proposed mitigations and controls; incorporating an additional year of model input data compared to the RAMP models; performing additional required analyses such as Mitigation Portfolio Optimization; addressing SPD and Intervenor feedback; and validating a significant volume of data, calculations, and

³ In adopting the original Rate Case Plan schedule, the Commission explained that the schedule "will create additional time for [Commission Staff] and parties to complete their review of the utility's RAMP farther in advance of the subsequent GRC filing date, **so that the utility has as much time as possible to meaningfully incorporate the results of this review in its GRC application.**" D.20-01-002, p. 48, emphasis added.

results. Many of these activities must be performed concurrently and involve coordination among various stakeholders including risk owners, GRC witnesses, subject matter experts, model developers, validators, and risk managers. Extending the SPD Evaluation Report due date by 60 days or 2 months practically reduces PG&E's opportunity to incorporate recommended modeling changes from 5 months to only 3 months. Any additional extensions of the SPD Evaluation Report deadline that may be requested by Staff would further reduce the time available for this work. Depending on the timing, scope, and complexity of SPD's feedback, the shortened period may prevent PG&E from fully incorporating the feedback into the GRC filing.

III. CONCLUSION

PG&E appreciates the opportunity to provide these comments on the Track 1 issues in this Rulemaking regarding RAMP Schedule. For the reasons discussed above, PG&E accepts the proposed Staff RAMP schedule subject to the timing constraints and reservations identified in these comments.

Respectfully Submitted,

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