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

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.

Application No. 25-05-009
(Filed May 15, 2025)

(U 39 M)

MOTION FOR PARTY STATUS OF CONSUMER WATCHDOG

Gerald B. Singleton (208783)
Paul Starita (219573)
SINGLETON SCHREIBER, LLP
591 Camino De La Reina, Ste. 1025
San Diego, CA 92108
(619) 771-3473
gsingleton@singletonschreiber.com
pstarita@singletonschreiber.com

Attorneys for Interested Party,
CONSUMER WATCHDOG

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INTRODUCTION

Pursuant to Rules 1.4 and 11.1 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), Consumer Watchdog respectfully moves for party status in this proceeding “Application No. 25-05-009, 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” (U39M) (Application).

Pacific Gas and Electric Company’s (PG&E) Application seeks a sweeping increase in the revenues it collects from captive ratepayers, including a 2027 test year base revenue requirement of approximately \$16.637 billion—roughly \$1.237 billion above currently authorized 2026 levels—together with proposed Post Test Year Ratemaking increases for 2028 through 2030. The outcome of this proceeding will directly and materially affect the rates, charges, and bills paid by the residential and small-business customers on whose behalf Consumer Watchdog advocates.

Of particular interest to Consumer Watchdog is PG&E’s requests to increase rates to implement its wildfire mitigation plan to reduce wildfire risk, and to recover costs for undergrounding investments—an interest sharpened by PG&E’s recent public statements that it is deferring approximately \$2 billion in planned 2027 investment, including infrastructure work bearing on wildfire safety. (PG&E Application, pp. 4, 14.)¹

Consumer Watchdog therefore seeks party status to represent the affordability, cost-allocation, and ratepayer-protection interests of those customers throughout this proceeding.

¹ <https://sjvsun.com/business/energy/pge-delays-2-billion-in-spending-after-wildfire-bill-setback/>

GROUNDS FOR MOTION

Rule 1.4(b) requires a person seeking party status by motion to (1) fully disclose the persons or entities on whose behalf the motion is made and their interest in the proceeding, and (2) state the factual and legal contentions the person intends to make and show that the contentions will be reasonably pertinent to the issues already presented. (Cal. Code Regs. tit. 20, § 1.4.) As set forth below, Consumer Watchdog satisfies both requirements.²

A. Description of Consumer Watchdog.

Consumer Watchdog is a nonprofit, nonpartisan consumer advocacy organization that works to protect the interests of utility ratepayers and consumers, including residential and small-business customers in PG&E's service territory. Consumer Watchdog has a long-standing mission of advocating for just, reasonable, and affordable utility rates; for the prudent and transparent expenditure of ratepayer funds; and for the fair allocation of costs among customer classes. Consumer Watchdog also brings the perspective of California residents and ratepayers who ultimately bear the cost of the revenue requirement at issue in this Application and who depend on the wildfire-mitigation work that PG&E's rates are meant to fund. Since its establishment in 1985, Consumer Watchdog has occasionally initiated, and participated in, Commission proceedings. (See, for example, the participation of the organization (then known as The Network Project) in R. 85-09-08, the Commission's investigation of telephone billing errors, particularly billing for landline calls not completed. See also its participation (then known as The Foundation for Taxpayer and Consumer Rights) in Investigation 02-04-026, challenging the Commission's Alternative Plan of Reorganization under Chapter 11 of the Bankruptcy Code for PG&E, May 9, 2002 and *Foundation for Taxpayer and Consumer Rights v. Calif. Public Utilities Comm.* (S105807); writ of mandate denied.)

This Motion is made solely on behalf of Consumer Watchdog and the California resident and ratepayer interests it represents, and not on behalf of any undisclosed person or entity.

² On or about September, Consumer Watchdog previously attempted to move for party status and an order showing cause that was not accepted.

B. Statement of Interest Pertinent to the Issues Presented.

Consumer Watchdog has a direct, substantial, and immediate interest in the outcome of this proceeding. The Application asks the Commission to authorize a large increase in the revenue PG&E collects from ratepayers. A large portion of the revenue requirement at issue seeks funding for PG&E's wildfire-mitigation program. PG&E has reported spending \$15.9 billion on wildfire mitigation between 2019 and 2024. Those increases fall directly on the residential and small-business ratepayers whose interests Consumer Watchdog advances. The Commission has recognized its obligation to consider whether utility rates are affordable while ensuring, under Public Utilities Code Section 451, that costs recovered from ratepayers are just and reasonable and consistent with safe and reliable service.

In harmony with that obligation, Consumer Watchdog's core interest is in ensuring that ratepayers receive the benefit of the safety work they are paying for, and that they are not charged for mitigation that PG&E does not perform or defers.

That interest has been brought into sharp focus by PG&E's own recent public statements. In September 2026, hours after the Legislature declined to pass wildfire-liability reform, PG&E's Chief Executive Officer announced that the company will defer about \$2 billion in planned 2027 investment, reducing its planned 2027 investments by roughly 15%, while launching a strategic review of its business.³ PG&E stated the deferral is driven by the cost and difficulty of financing its operations under California's current wildfire-liability framework, which it says raises its borrowing costs.⁴ News reports indicate that the reduction may affect infrastructure such as poles, wires, and sensors.⁵

PG&E's deferral announcement coincides with, and directly implicates, issues already squarely before the Commission in this proceeding. The record reflects longstanding concern

³ PG&E defers \$2 billion in planned 2027 investment after liability bill fails found at <https://www.msn.com/en-us/news/other/pg-e-defers-2-billion-in-planned-2027-investment-after-liability-bill-fails/ar-AA2bwHpP>

⁴ <https://nypost.com/2026/09/06/us-news/pge-cuts-2-billion-in-planned-spending-over-wildfire-liability-fight/>

⁵ <https://nypost.com/2026/09/06/us-news/pge-cuts-2-billion-in-planned-spending-over-wildfire-liability-fight/>

about PG&E’s deferral of safety-related work: the Public Advocates Office has shown that PG&E deferred its overhead conductor replacement work, which PG&E acknowledges is a key mitigation for hazardous wire-down events, for *five* consecutive years, resulting in a cumulative underspend of approximately \$238.4 million. (Opening Brief of the Public Advocates Office on Pacific Gas and Electric Company’s 2027 General Rate Case Application at pp. 68–69.)

The Application and the Public Advocates Office’s briefing also place directly in issue PG&E’s wildfire-mitigation memorandum accounts (the WMPMA and FRMMA) and whether wildfire-mitigation costs should be recovered through those accounts or within the general rate case. (Opening Brief of the Public Advocates Office on Pacific Gas and Electric Company’s 2027 General Rate Case Application at p. 26.)

In addition, on October 23, 2026, the Public Advocates Office filed a motion in this proceeding to address PG&E’s announcement of \$2 billion in deferred expenditures and capital restricting.

Consumer Watchdog’s interest in whether ratepayers pay for wildfire mitigation that is actually performed is therefore reasonably pertinent to issues already presented.

C. Factual and Legal Contentions Consumer Watchdog Intends to Make in this Proceeding.

Consumer Watchdog intends to make the following factual and legal contentions, among others, as its review and the proceeding develop. Each is reasonably pertinent to issues already presented in this Application.

1. Consumer protection — pay for performance. The Commission should ensure that ratepayers pay only for wildfire-mitigation and safety work that PG&E actually performs. In light of PG&E’s announced deferral of approximately \$2 billion in planned 2027 investment and its documented history of deferring overhead conductor replacement work for five consecutive years, the Commission should scrutinize whether amounts sought in this Application correspond to work that will be completed on schedule. The Commissioner should mandate PG&E complete

all wildfire mitigation work included in its Application as a basis to support a rate increase, and detail that work with deadlines in its order.

2. Affordability. Consistent with the Commission's affordability obligations and Public Utilities Code Section 451, the Commission should weigh the cumulative bill impact on residential and small-business ratepayers and limit any authorized increase to costs that are necessary, reasonable, and cost-effective.

3. Memorandum and balancing accounts. The Commission should closely examine PG&E's wildfire-mitigation memorandum accounts (WMPMA and FRMMA) and related cost-recovery mechanisms to ensure ratepayers are not charged, through those accounts or otherwise, for deferred or unperformed mitigation.

4. Financial and public-policy implications of the deferral strategy. PG&E states that its deferral is driven by the cost of financing under the current liability framework, and that its higher borrowing costs are ultimately borne by customers. Consumer Watchdog will contend that the Commission should ensure ratepayers are protected where a utility reduces or defers planned safety investment for financing reasons while simultaneously seeking to increase the rates those ratepayers pay, and that higher financing costs are not simply passed through without scrutiny of their necessity and reasonableness.

5. Transparency and accountability. The Commission should require PG&E to account, transparently and in detail, for deferred work, the reasons for deferral, and the disposition of ratepayer funds authorized but not spent on the mitigation work for which they were collected.

Consumer Watchdog is continuing to review the Application and its supporting testimony and seeks the ability to address additional issues within the scope of this proceeding as they arise through further review, analysis, discovery, and investigation.

D. Party Status and Service

By filing this motion, Consumer Watchdog seeks to gain party status. Consumer Watchdog consents to “email only” service and requests that the following individual be added to the service list for A.25-05-009 as Consumer Watchdog’s representative in this proceeding:

Gerald B. Singleton
Paul Starita
Jonna Lothyan
SINGLETON SCHREIBER, LLP
591 Camino De La Reina, Ste. 1025
San Diego, CA 92108
(619) 771-3473
Email: gsingleton@singletonschreiber.com
Email: pstarita@singletonschreiber.com
Email: jlothyan@singletonschreiber.com
Email: tbarba@singletonschreiber.com

William Pletcher
CONSUMER WATCHDOG
6330 San Vicente Boulevard, Suite 250
Los Angeles, California 90048
Telephone: (310) 392-2632
Email: will@consumerwatchdog.org

E. Relief Requested

Consumer Watchdog requests that the assigned Administrative Law Judge or the Commission grant this Motion and:

1. Grant Consumer Watchdog full party status in Application No. 25-05-009, with all rights of a party;
2. Add Consumer Watchdog and its designated representative(s) to the official service list for Application No. 25-05-009; and
3. Grant such other and further relief as the Commission deems just and reasonable.

CONCLUSION

Consumer Watchdog's participation will not broaden the scope of this proceeding, prejudice any party, or cause undue delay. Consumer Watchdog accepts the record of this proceeding and is prepared to abide by the schedule and scope established in the Commission's scoping memo. For the foregoing reasons, Consumer Watchdog respectfully requests that the Commission grant this Motion for Party Status and add Consumer Watchdog to the service list for Application 25-05-009.

Date: October 27, 2026

Respectfully submitted,

/s/ Paul Starita

Gerald B. Singleton

Paul Starita

SINGLETON SCHREIBER, LLP

591 Camino De La Reina, Ste. 1025

San Diego, CA 92108

(619) 771-3473

gsingleton@singletonschreiber.com

pstarita@singletonschreiber.com

Attorneys for CONSUMER WATCHDOG