BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Application of Pacific Gas and Electric Company for Adoption of Electric Revenue Requirements and Rates Associated with its 2027 Energy Resource Recovery Account (ERRA) and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation	Application 26-05-007 (Filed May 15, 2026)

MOTION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) FOR LEAVE TO FILE REPLY COMMENTS IN RESPONSE TO CAL ADVOCATES' COMMENTS ON PG&E'S FALL UPDATE TESTIMONY

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November 10, 2026

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I. INTRODUCTION

Pursuant to Rules 11.1 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure ("Rules"), Pacific Gas and Electric Company ("PG&E") respectfully files this Motion for Leave to File Reply Comments in response to the California Public Advocates Office ("Cal Advocates") comments on PG&E's Fall Update Testimony on Friday, November 13, 2026.

II. RELIEF REQUESTED

PG&E respectfully requests that the Administrative Law Judge grant it leave to file reply comments in response to Cal Advocates' comments on PG&E's Fall Update Testimony for three reasons. First, Cal Advocates' comments raise new issues of fact that were not raised in testimony or briefing and not subject to applicant review or cross-examination; it is inappropriate for the Commission to consider new factual contentions as established in the record.[1] Indeed, Cal Advocates did not file testimony or briefs in this proceeding, making this PG&E's first opportunity to review Cal Advocates' concerns with the load forecast. Second, Cal Advocates' comments suggest that PG&E has failed to meet its burden of proof to demonstrate the reasonableness of its load forecast.[2] Third, absent an opportunity to respond to Cal Advocates' comments, new factual and legal challenges to PG&E's ERRA Forecast, as modified by its Fall

[1] Cal Advocates' Comments on PG&E Fall Update Testimony (Nov. 4, 2026), pp. 3-4.
[2] *Id*., p. 4.

Update testimony, would become part of the closed record without affording PG&E a fair opportunity to address or rebut those contentions.

Permitting PG&E to file reply comments would promote fundamental fairness and avoid prejudice. Cal Advocates' comments raise new factual and legal contentions after the close of the record. Absent an opportunity to respond, PG&E would be prejudiced by having those contentions considered by the Commission without a meaningful opportunity to address them, contrary to basic principles of due process and orderly administrative procedure. Given the expedited schedule in this proceeding and the Commission's planned issuance of a final decision in December to ensure that ERRA forecast costs are reflected in rates effective January 1, PG&E respectfully requests that the Commission rule on this motion as expeditiously as practicable and grant PG&E leave to file reply comments on November 13, 2026.

III. CONCLUSION

PG&E requests that the Commission expeditiously grant this Motion such that PG&E may file and serve its reply comments this Friday.

Respectfully submitted,

BY /s/ Maria V. Wilson
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