BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

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11/09/26
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Petition of the Utility Fire Alliance to adopt, amend, or repeal a regulation pursuant to Pub. Util. Code § 1708.5.	Petition No. _____ (Filed November 9, 2026)

THE UTILITY FIRE ALLIANCE PETITION TO ADOPT, AMEND, OR REPEAL A REGULATION PURSUANT TO PUBLIC UTILITIES CODE § 1708.5 AND OPEN A RULEMAKING TO DEVELOP A PATH TO FULL FIRE VICTIM RESTITUTION UNDER PUBLIC UTILITIES CODE § 719.3

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Petitioner, The Utility Fire Alliance ("UFA") respectfully petitions the California Public Utilities Commission ("Commission" or "CPUC"), pursuant to Public Utilities Code § 1708.5 and Rule 6.3 of the Commission's Rules of Practice and Procedure, to issue an Order Instituting Rulemaking ("OIR") "*to ensure there is a path to full restitution for wildfire victims*" and to develop restitution mechanisms that "*ensure full compensation is issued in a timely manner*" as required by Public Utilities Code § 719.3(c)(1)(A), (AB 2700, Chapter 959, Statutes of 2026). In support, UFA submits the prospective, class-wide information and verification rules in Appendix A, as the specific proposed regulatory text required by Rule 6.3. These rules are a means to produce a credible path to full victim compensation and not the ultimate objective of this petition.[1]

Specifically, UFA requests a quasi-legislative rulemaking with (1) a formal evidentiary fact-development track, (2) targeted party discovery concerning utility financial capacity and available non-ratepayer restitution mechanisms, (3) meaningful participation by wildfire survivors and fire-affected businesses and communities, (4) independent technical analysis including a comparison of non-ratepayer financing options, (5) enhanced transparency protections, and (6) a defined hearing and comment schedule that permits the Commission to

[1] Stats. 2026, ch. 959 (AB 2700), § 2 (adding Pub. Util. Code § 719.3(b), (c), (d), (e), (g)), chaptered Sept. 30, 2026; chaptered bill text: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB2700.

complete and publicly adopt its report, with actionable recommended pathway(s), milestones, benchmarks and the other § 719.3 requirements no later than January 1, 2028.

The requested proceeding would develop an efficient evidence-based path to full victim restitution as required by § 719.3. However, UFA does not ask the Commission in this petition to order implementation or payment through any identified restitution mechanism given that Section 719.3(g) expressly reserves implementation for subsequent statutory authorization. This petition instead seeks a fair, transparent, and technically rigorous process for the Commission to perform the duties the Legislature has assigned to it.

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I. INTRODUCTION AND SUMMARY OF REQUESTED RELIEF

AB 2700 (Stats. 2026, ch. 959) added Public Utilities Code § 719.3 and directed the Commission, on or before January 1, 2028, "*to ensure there is a path to full restitution for wildfire victims*" and to develop recommended "*restitution mechanisms, to ensure, among other things, that the verified restitution shortfalls are consistently and fairly paid...*"[2] This path to full restitution must support "*victims of wildfires caused by electrical corporations occurring before July 12, 2019*" and "*set a foundation and precedent for ensuring restitution for all wildfire victims, including victims of the 2025 Eaton Fire*."[3] Given that many of these fire victims continue to suffer due to the lack of full payment by the electrical corporations, the law expressly indicates that the identification of "*restitution mechanisms should be expedited*."[4] Therefore, UFA respectfully requests an expedited timeline for the proceeding.

Moreover, the Legislature did not simply direct the Commission to identify unpaid losses. Section 719.3 requires the Commission to (1) develop restitution mechanisms that include the "*establishment of timelines and benchmarks for achieving full* [victim] *compensation*" and (2) to consider financial tools (deferred or reduced shareholder dividends, retained earnings or equity contributions, bonds, etc.) that "*preserve utility financial stability while ensuring full victim compensation.*"[5]

UFA requests an expedited and appropriately scoped rulemaking to develop credible, financially supported pathways to full utility-caused wildfire victim restitution under Public Utilities Code § 719.3. The proceeding should evaluate feasible non-ratepayer funding mechanisms, develop payment timelines and benchmarks, and identify any additional statutory authorization needed to implement the recommended mechanisms.

To support that work, UFA seeks a transparent public record, information requirements and discovery, meaningful participation by wildfire survivors and affected communities, independent technical analysis where appropriate, and safeguards supporting open and accountable decision-making. The requested schedule should permit timely development and public review of actionable recommendations while preserving the statutory deadline. UFA does not seek an order implementing restitution payments through this petition. The specific relief

[2] Pub. Util. Code § 719.3(d)(1), (c)(1)(A), see also Legis. Counsel's Dig., Assem. Bill No. 2700, 2025–2026 Reg. Session, chaptered Sept. 30, 2026, second paragraph.
[3] Pub. Util. Code § 719.3(b), (d)(2).
[4] Stats. 2026, ch. 959, § 1(b)(3).
[5] Pub. Util. Code § 719.3(c)(1)(C), (e)(5) added by Stats. 2026, ch. 959, § 2.

requested is set forth in Section XI. Appendix A provides the proposed regulatory text, and Appendix B presents the proposed scope and milestone schedule.

The above relief is necessary to ensure just and fair restitution for wildfire survivors, the recovery of our families and the resiliency of communities across California. The Commission should not consider any less of a process given the substantial consequences for California. Indeed, the lack of restitution provided to fire victims has led to huge downstream implications for California including but not limited to a lack of community resiliency, insurance scarcity and general unaffordability in the wake of catastrophic utility-caused fires. Given these high stakes, this proposed proceeding established by the Commission must expeditiously provide a path to "*ensure full* [fire victim] *compensation is issued in a timely manner*" pursuant to § 719.3.[6]

II. PETITIONER AND INTEREST IN THE PROCEEDING

The Utility Fire Alliance ("UFA") is a California nonprofit public benefit corporation, incorporated on October 14, 2026, and registered with the California Secretary of State under Entity Number B20260461667. UFA was formed to advance charitable and educational public-interest objectives relating to utility accountability, safe, reliable and affordable utility service, community resilience, full recovery after utility-caused disasters, consumer and ratepayer protection, public education, and participation in administrative and judicial proceedings in furtherance of those purposes. UFA was formed by wildfire survivors and public-interest advocates with direct experience in the long-term consequences of utility-caused wildfires. UFA will represent and facilitate participation by wildfire survivors, fire-affected businesses, fire-torn communities, as well as residential and small commercial utility customers in Commission proceedings implicating wildfire recovery, utility accountability, safety, affordability, and reliability.

UFA has a direct and substantial interest in ensuring that the Commission's implementation of § 719.3 follows the Legislature's clear direction, develops a complete record, protects ratepayers from restitution cost shifting, and provides affected communities with meaningful access to the process. By filing this petition, UFA becomes a party to this petition proceeding under Rule 1.4(a)(1).

[6] Pub. Util. Code § 719.3(c)(1)(A), added by Stats. 2026, ch. 959, § 2; see also Legis. Counsel's Dig., Assem. Bill No. 2700, 2025–2026 Reg. Session, chaptered Sept. 30, 2026, second substantive paragraph.

III. STATUTORY BACKGROUND AND LEGISLATIVE DIRECTION

A) AB 2700 Establishes a State Policy of Full, Fair, and Timely Compensation

AB 2700 was signed into law by the Governor and chaptered on September 30, 2026, as Chapter 959, Statutes of 2026. Section 719.3 becomes effective January 1, 2027 and given the stated intent of the legislation to "***expedite*** *remedies for victims of wildfires,"* this petition is appropriately filed to further that stated legislative direction.[7] The Legislature, through this bill, declared that it is the policy of California that victims of utility-caused wildfires should be fully, fairly, and timely compensated, and that the "*ultimate responsibility and accountability*" for this victim compensation "*rests with the electrical corporation that ignited the wildfire*."[8]

The statute defines "full compensation" for PG&E wildfire victims from 2015 through 2018 whose claims were litigated through the bankruptcy process as payment of 100 percent of verified economic and noneconomic losses reflected in PG&E Fire Victim Trust Determination Notices. For other qualifying utility-fire victims, full compensation "*means 100 percent of the financial damages as determined by a court order, settlement agreement, utility compensation program, or other restitution mechanism*."[9]

B) Section 719.3 Requires Restitution Path(s) and Mechanism Recommendations

Section 719.3(b) requires the Commission to complete its report and recommendations by January 1, 2028 and Section 719.3(d)(1) requires the mechanisms developed for that report to "*ensure there is a path to full restitution for wildfire victims.*" The recommendations must ensure full and fair compensation in a timely manner while supporting long-term rate stability, and they may not authorize rate recovery for restitution payments. Section 719.3(d)(3) further requires a framework that can reduce administrative costs and streamline victim restitution processes.

Section 719.3(c) requires the Commission to ensure that "*verified restitution shortfalls are consistently and fairly paid*" and to "*ensure full compensation is issued in a timely manner*;" that incremental payments, if necessary, are proportional to verified losses; and require the "*establishment of timelines and benchmarks for achieving full compensation*."[10] Importantly, Section 719.3(c)(2) and (d)(1)-(2) also require that the identified pathways to full restitution must

[7] Pub. Util. Code § 719.3(c)(2).
[8] Stats. 2026, ch. 959, § 1(a)(5).
[9] Pub. Util. Code § 719.3(a)(2)(A)-(B).
[10] Pub. Util. Code § 719.3 (c)(1)(A)-(C).

be "*for all victims of wildfires caused by an electrical corporation*" and must "*prioritize and expedite remedies for victims of wildfires occurring between January 1, 2015, and July 12, 2019*."[11] UFA respectfully asks the Commission to provide a deliberative and transparent process towards these recommended remedies so that wildfire survivors, affected businesses and communities across California may have confidence in the proposed path(s) towards full restitution.

C) The Legislature Identified Specific Non-Ratepayer Financial Tools

Section 719.3(e) directs the Commission not to consider restitution mechanisms that authorize rate recovery. Instead, it must consider other measures, including:

- "*Deferred or reduced shareholder dividends*;"
- "*Retained earnings or equity contributions*;"
- "*Bonds or other unstructured or structured debt mechanisms*;"
- "*Access to existing wildfire-related financial structures, where permissible*;" and
- "*Other financial tools that preserve utility financial stability while ensuring full victim compensation*."

Evaluating those mechanisms requires more than receiving comments from parties to the proceeding. Each potential restitution pathway should be evaluated under a common, transparent set of criteria faithfully adhering to § 719.3. The Commission will need comparable financial data, a disciplined methodology, and a record capable of supporting conclusions about methods for full victim compensation, timing, utility stability, and ratepayer neutrality.

D) Section 719.3 Limits Implementation but Not CPUC's Duty to Develop a Full Record

Section 719.3(g) provides that the Commission may not implement the restitution mechanisms developed under the section unless explicitly authorized by statute. In keeping with this provision, UFA does not seek implementation through this petition. The requested OIR, as outlined within Appendix A, is directed to the Commission's current authority and duty to investigate, analyze, develop, and recommend mechanisms for full victim recovery and to generate the report with the specific pathways and benchmarks the Legislature mandated.

[11] Pub. Util. Code § 719.3(c)(2), (d)(1)-(2).

The proceeding should remain focused on fulfilling § 719.3's direction to ensure that victims of utility-caused wildfires are "*fully, fairly and timely compensated for their losses*."[12] Consistent with Article III, Section 3.5 of the California Constitution and controlling judicial authority, parties may identify concrete legal and financial constraints affecting particular proposed mechanisms, including any additional statutory authorization needed under § 719.3(g), without converting that analysis into a collateral challenge to the legislative mandate. UFA requests that the scoping memo preserve this distinction and maintain timely progress toward the statutory objectives.[13]

IV. A FORMAL OIR IS AN APPROPRIATE PROCEDURAL VEHICLE

A) Rule 6.3 Authorizes This Petition

Rule 6.3(a) permits any person to petition the Commission under Public Utilities Code § 1708.5 to adopt, amend, or repeal a regulation. A proposed regulation must apply to an entire class of entities or activities under Commission jurisdiction and to future conduct. The substantive reason for the proposed OIR is the Commission's new duties in accordance with § 719.3. This petition proposes prospective procedural and disclosure requirements applicable to the class of jurisdictional electrical corporations relevant to § 719.3 and to the Commission's development of statutory pathways for full utility-caused fire victim recovery. Appendix A supplies specific proposed wording as required by Rule 6.3(b).[14]

B) The Proposed OIR is Consistent with Section 719.3(d)(3)

Section 719.3 requires the State to "*establish a framework within existing commission processes*" such as the proposed rulemaking proceeding.[15] The proposed rulemaking would coordinate and use existing Commission records and administrative processes rather than establish a duplicative claims-administration system. UFA seeks a defined public forum to address the new regulatory questions and to respond to the clear legislative direction to set a path towards full victim restitution as presented by § 719.3, not the reconsideration of individual damage determinations.

[12] Stats. 2026, ch. 959, § 1 (b)(1)
[13] Cal. Const., art. III, § 3.5(a)–(c) (limitations on administrative determinations); CPUC Rules of Practice and Procedure, Rule 7.3 (scoping memo determining issues to be addressed and proceeding's schedule).
[14] Pub. Util. Code § 1708.5(a); Rule 6.3(a)-(b), and Rule 6.1.
[15] Pub. Util. Code § 719.3(d)(3).

C) A Rulemaking Should Develop Policies With Evidentiary Fact Development

Rule 6.1 authorizes the Commission to institute rulemakings to adopt rules, regulations, and guidelines for a class of public utilities or other regulated entities. The Commission has repeatedly used OIRs to implement new legislative mandates affecting electrical corporations, including its 2019 rulemaking implementing AB 1054. Importantly, for this petition, R.19-07-017 was focused on a different statutory financing framework. The Commission's decision (D.19-10-056) authorized a non-bypassable ratepayer charge supporting the Wildfire Fund and it did not contemplate the newly enacted § 719.3 duties or the associated victim restitution remedies.[16]

Indeed, a quasi-legislative OIR is appropriate because § 719.3 similarly requires a statewide policy framework and recommendations affecting a class of regulated electrical corporations. At the same time, the OIR can contain a formal fact-development phase. Rule 10.1 permits party discovery of relevant, nonprivileged matters from other parties, and Rule 10.2 provides subpoena procedures. The Commission and its staff also possess independent information-gathering authority, including under Public Utilities Code § 314.

Therefore, UFA respectfully requests an OIR with distinct policy and evidentiary tracks rather than an enforcement investigation focused on adjudicating past violations. To be clear, UFA does not seek adjudication of past misconduct, modification of final judgments, or reopening of bankruptcy determinations through this rulemaking. The requested proceeding would simply develop the information, analysis, and recommendations needed to address the new duties established by § 719.3.

D) A Formal Proceeding Is Necessary to Protect the Integrity and Utility of the Report

The proposed formal OIR is an appropriate and efficient mechanism for developing the uniform information requirements, tested financial analysis, and public participation needed to fulfill § 719.3. The Commission must assess losses, evaluate multiple financing mechanisms, protect confidential information, hear from affected communities, and formulate specific pathways and recommendations. A public docket, defined scope, discovery procedures, technical record, and comment process will materially improve the quality and legitimacy of the report while reducing the risk that any single stakeholder or regulated utility will shape the analytical framework through informal non-transparent mechanisms.

[16] D.19-10-056, Oct. 24, 2019, R.19-07-017.

UFA does not seek to exclude utilities from the process. Indeed, they must play a central role within the proceeding. Electrical corporations possess information essential to a technically sound analysis and must have a fair opportunity to present evidence and argument. However, through their active engagement in the proceeding, they must, along with all participants, adhere to and not distract from the clear legislative direction as expressed within § 719.3. The objective is parity, transparency, and a record-based process in which utilities, survivors, ratepayer representatives, businesses, and other stakeholders operate under common procedural rules.

V. PROPOSED SCOPE OF THE OIR

Track 1 - Verified Restitution Shortfalls and Data Integrity

The Commission should establish transparent, reliable and publicly explainable recommendations with a verified factual basis from which full victim compensation pathways can be developed while maintaining consistency with the statutory definitions of § 719.3(a). At minimum, this track should address:

- Aggregate verified losses and amounts previously paid for each qualifying wildfire or victim cohort, using the statutory definitions in § 719.3(a) while maintaining claimant confidentiality and obtaining claimant authorizations for disclosure and releases of information where required.
- Methodologies for calculating the remaining fire victim recovery shortfalls, including treatment of offsets, liens, administrative deductions, and prior distributions where legally relevant and consistent with § 719.3(a)(4)(B);
- Data necessary to distinguish economic and noneconomic losses and to identify business-related losses where the underlying determination mechanism permits that distinction;
- Processes for evaluating the time value of unpaid restitution, accrued interest on victim debts, and other economic consequences of delayed compensation;
- Procedures for obtaining data from utilities, trusts, settlement administrators, governmental entities, or other lawful sources while respecting privacy, protective orders, and applicable confidentiality obligations;
- Validation, audit, reconciliation, and error-correction procedures sufficient to support Commission findings; and

- A public-facing aggregate dataset and methodology that protects individual claimant information while permitting meaningful review of the Commission's calculations.

Track 2 - Utility Financial Capacity and Restitution Mechanisms

The Commission should develop a standardized evidentiary record concerning the financial tools identified by § 719.3(e). Rule 10.1 permits relevant, nonprivileged discovery from parties, subject to applicable limitations. In keeping with Commission's Rules of Practice and Procedure, discovery and required utility disclosures should address the following:

- Historical and projected shareholder dividends, dividend restrictions, and dividend capacity;
- Retained earnings, parent-company and utility-level equity, potential equity contributions, and capital-allocation policies;
- Existing debt, debt capacity, revolving credit facilities, secured and unsecured borrowing, structured and unstructured debt, bonds, securitizations, and comparable capital-market instruments;
- Credit ratings, debt covenants, liquidity requirements, regulatory capital considerations, and other constraints relevant to commercially reasonable timing;
- Existing wildfire-related financial structures, insurance proceeds, claims facilities, trusts, and other arrangements that may inform or support restitution mechanisms;
- Historical examples in which an electrical corporation or its parent used dividends, equity, debt, securitization, asset sales, or other financing to address liabilities or other regulatory obligations;
- The tax, accounting, cash-flow, credit, and corporate-governance consequences of candidate restitution mechanisms;
- Alternative payment schedules, including proportional interim payments where full immediate payment is not feasible; and
- Explicit confirmation that considered mechanisms do not depend on rate recovery for restitution payments.

The purpose of this discovery is not to prejudge the appropriate financing mechanism or impair utility stability. It is to create the evidentiary basis the Legislature contemplated when it directed

the Commission "*to balance the financial integrity of public utilities with the protection of ratepayers and the financial interest of the public, including wildfire victims*."[17]

Track 3 - Survivor, Business, Ratepayer, and Community Participation

The Commission should create participation mechanisms designed for people who are not regular CPUC practitioners. UFA requests:

- **Public participation hearings** or equivalent Commission-sponsored public forums in fire-affected regions, including at least one North Bay fire-area forum, one Butte County/Paradise-area forum, one SCE Eaton Fire-area forum together with statewide virtual participation;
- **Technical workshops** devoted to survivor and business recovery impacts and at least one workshop devoted to financing mechanisms;
- **Notices** explaining the proceeding, statutory mandate, scope, deadlines, and ways to participate;
- **The Commission's public-comment docket** should be used under Rule 1.18, with relevant public comments summarized and addressed in the final decision and report;
- **Further opportunities** for local governments, Tribes where applicable, community recovery organizations, small businesses, consumer representatives, and wildfire survivors to provide evidence or statements without unnecessary procedural barriers; and
- **Accessibility measures**, including remote participation and reasonable language or disability accommodations.

Track 4 - Independent Technical Analysis and Consultant Safeguards

Section 719.3 does not require the Commission to outsource its analysis. The Commission should remain responsible for the recommendations and report. If the Commission determines that outside financial, restructuring, actuarial, economic, accounting, or other expertise is necessary to support the proposed proceeding, UFA requests a transparent process that includes:

- A publicly described scope of work before consultant selection, with an opportunity for parties to comment on analytical questions and data needs;

[17] Stats. 2026, Ch. 959, § 1(a)(2), (striking balance between IOU and public/victim financial integrity).

- Appropriate competitive procurement or other lawful selection procedures with opportunities for parties to provide comments on that proposed Commission process;
- Disclosure and screening of material current or recent financial relationships with affected electrical corporations, their parent companies, major investors, claimant trusts, law firms, financing counterparties, or other materially interested entities;
- Contractual protection of Commission decisional independence and ownership of the analytical work product;
- Public release of nonconfidential methodologies, assumptions, models, and sources sufficient to permit meaningful review; and
- An opportunity for parties to test and respond to consultant analyses before the Commission relies on them.

Track 5 - Draft Report, Recommendations, Timelines, and Legislative Pathway

The OIR should culminate in a public draft report containing proposed findings, methodologies, financing analyses, recommended mechanisms, timelines and benchmarks, and any recommendations for subsequent statutory authority. Parties should receive a meaningful opportunity to comment and reply before final Commission action. The final report should identify which recommendations the Commission believes should be pursued under existing authority, without purporting to implement any mechanism barred by § 719.3(g).

VI. PROCEDURAL SAFEGUARDS, TRANSPARENCY PROTOCOLS

A) Enhanced Ex Parte Reporting

Under current Rule 8.2(a), ex parte communications in quasi-legislative proceedings are ordinarily permitted without restriction or reporting. Rule 8.2(d), however, authorizes the assigned Commissioner to restrict or prohibit ex parte communications or require reporting in a quasi-legislative proceeding. UFA requests such a ruling here. At minimum, substantive ex parte communications concerning the § 719.3 report, methodology, utility financial capacity, financing mechanisms, consultant scope or selection, proposed findings, or recommendations should be reported on the docket in substantially the same manner contemplated by Rule 8.4.

This safeguard should apply equally to utilities, investors, survivor organizations, consumer groups, businesses, and all other interested persons. The requested rule would not prevent stakeholder engagement. It would ensure that substantive advocacy capable of

influencing the statutory report is visible to all participants and can be tested against the public record. To be clear, UFA requests this reporting requirement for any resulting quasi-legislative proceeding, subject to the assigned Commissioner's authority under Rule 8.2(d), rather than as a restriction automatically applicable during consideration of this petition.

B) Confidentiality Should Be Narrowly Tailored

The Commission should protect legitimately confidential financial and personally identifying information through protective orders, redaction, aggregation, or in camera procedures where appropriate. At the same time, the existence, category, source, and general relevance of confidential submissions should be publicly indexed to the extent lawful so that confidentiality does not become a substitute for transparency.

C) Utilities Should Provide Information Through Common Requirements

To avoid asymmetrical or selectively framed submissions, the OIR should establish standardized data templates and common production requirements for similarly situated electrical corporations. Utilities may supplement those materials with explanatory testimony and advocacy, but the core record should be comparable across entities and mechanisms. However, given the specific requirements defined in § 719.3 to support and prioritize the recovery of 2015-2018 PG&E fire victims, the Commission should require more detailed submissions from PG&E and in particular those matters assigned to the PG&E Fire Victim Trust ("FVT") and leading to the FVT shortfall.[18]

D) The Proceeding Should Preserve Commission Independence

Neither UFA nor any other stakeholder should control the report or related analysis. The Commission should maintain responsibility for scope, evidence, consultant selection, findings, and recommendations. The procedural protections requested here are designed to make that process transparent, guided by appropriate stakeholder engagement, and with public accountability to ensure that any recommended mechanisms, when implemented through further legislation, will lead to the full restitution of wildfire victims and the recovery of families across the many fire-torn communities of California.

[18] Pub. Util. Code § 719.3(a)(2)(A), § 719.3 (c)(2) & (d)(1), (full recovery in FVT determination notices).

VII. PROPOSED EXPEDITED SCHEDULE

Because § 719.3 becomes effective January 1, 2027 and requires a completed report by January 1, 2028, UFA proposes a scope and schedule substantially similar to the outline set forth within Appendix B. This schedule should balance the need to expeditiously drive the proceeding given the (1) statutory deadline and (2) ongoing harms to fire victims awaiting full compensation, with the need to (3) ensure a fulsome proceeding that faithfully adheres to § 719.3 requirements while (4) resisting scope creep into areas not defined within the legislation.

Furthermore, UFA requests that the expedited proceeding focus on the required "restitution mechanisms" as defined within §§ 719.3(c)–(d) to ensure that the recommendations and associated report include substantive compensation pathways, benchmarks and relevant financial analysis. Importantly, a petition filed in 2026 does not guarantee a January 2027 OIR given that § 1708.5(b) generally gives the Commission six months to act on a petition, subject to a statutory extension. UFA therefore proposes that the Commission consider a schedule with concurrently addressed milestones substantially similar to those outlined within Appendix B that run from the actual commencement date and asks the Commission to consider all lawful means of preserving the reporting deadline.[19]

To be clear, fire victims, particularly those from the 2015-2018 PG&E fires, have been waiting and suffering way too long while relying upon PG&E's commitment to "*fully and fairly compensate all eligible wildfire.*" UFA respectfully requests that the Commission consider the fact that many wildfire survivors have been unable to pay medical bills and rebuild their homes and businesses due to a lack of recovery. Therefore, every effort should be made to efficiently and clearly identify the specific recommended pathways for full recovery where justice, transparency and opportunities for participation in the proceeding are not short-changed. Through this type of expedited process, the Legislature may choose to quickly enact the recommendations put forward by the Commission and finally provide fire victims with much needed relief.

VIII. PROPOSED REGULATION REQUIRED BY RULE 6.3

UFA's principal objective is to open a proceeding capable of developing a meaningful path to full restitution in accordance with § 719.3. Rule 6.3(b) requires a petition seeking adoption or

[19] Pub. Util. Code § 1708.5(b)(1)-(2) (six-month review period); § 719.3(b) (Jan. 1, 2028 report deadline).

amendment of a regulation to provide specific proposed regulatory wording. UFA therefore proposes the regulation set forth in Appendix A that sets out future-conduct, information-submission and validation standards for a class of regulated electrical corporations, intended to supply the evidence needed to identify reliable pathway(s) and the associated statutory report. To support a proceeding oriented towards a meaningful path to full restitution, UFA requests consideration and adoption of the process and validation requirements set forth in Appendix A. These requirements would support the factual and financial analysis necessary to develop prospective restitution mechanisms, payment timelines, and benchmarks consistent with Public Utilities Code § 719.3 while clearly satisfying Rule 6.3(a).[20]

IX. RULE 6.3 PRIOR COMMISSION LITIGATION OF THE ISSUES

To UFA's knowledge, the specific issues presented by this petition, specifically the procedural rules, evidentiary record, financial disclosures, public participation structure, transparency safeguards, and schedule for implementation of newly enacted Public Utilities Code § 719.3, have not previously been litigated or decided by the Commission. AB 2700 was chaptered on September 30, 2026 and § 719.3 becomes effective January 1, 2027.

Rule 6.3(b) requires that a petition for rulemaking state whether the issues raised have, to the petitioner's knowledge, been previously litigated before the Commission, and if so to provide relevant information on that prior litigation. There are several Commission proceedings that have addressed similar issues before the Commission. However, while prior utility and wildfire-financing proceedings addressed related financial subjects, none have addressed the distinct newly enacted mandate to develop a path to full compensation under § 719.3(c)–(d), nor the particular class-wide information standards UFA now proposes.

In R.19-07-017, D.19-10-056 addressed the AB 1054 Wildfire Fund non-bypassable charge, not a prospective data protocol under § 719.3.[21] In I.19-09-016, D.20-05-053 addressed PG&E's plan of reorganization and related regulatory conditions.[22] In A.20-04-023, D.21-04-030 examined PG&E financing and stress-test issues.[23] In A.21-01-004, D.21-05-015 addressed a related financing order.[24] However, while these decisions provide useful precedent and data, they

[20] Rule 6.3(a)-(b), CPUC Rules of Practice and Procedure, effective May 1, 2021.
[21] D.19-10-056, Oct. 24, 2019, R.19-07-017.
[22] D.20-05-053, May 28, 2020, I.19-09-016.
[23] D.21-04-030, Apr. 22, 2021, A.20-04-023.
[24] D.21-05-015, May 6, 2021, A.21-01-004.

did not resolve the process or recommended utility-fire victim recovery and restitution remedies now required by § 719.3.

Rule 6.3(f) precludes consideration of a petition concerning an issue on which the Commission acted, or decided not to act, within the preceding 12 months. UFA recognizes that this restriction concerns the substantive issues presented, not merely whether identical regulatory language was previously proposed. This Petition responds directly to the newly enacted requirements of AB 2700, approved and chaptered on September 30, 2026, and effective January 1, 2027.[25]

The Petition does not seek reconsideration of the California Wildfire Fund or the victim restitution provisions adopted through SB 254 continuation account. Rather, it seeks a formal proceeding to address the distinct questions presented by § 719.3. Relevant records from earlier proceedings can inform this work without reopening their outcomes or duplicating their evidentiary development. This limited request is distinguishable from the broad, overlapping policy review rejected in D.24-10-011, where the Commission identified issues already being considered in active proceedings or addressed within the preceding 12 months.[26] To UFA's knowledge as of the filing date, the Commission has neither acted on nor decided not to act on the distinct § 719.3 implementation issues identified here within that period. UFA therefore submits that Rule 6.3(f) does not bar this Petition. The requested proceeding would address newly prescribed restitution objectives while relying upon relevant existing Commission processes.

X. RULE 6.3 SERVICE AND PROCEDURAL REQUIREMENTS

Rule 6.3(b) requires specific proposed wording, a prior-proceedings account and verification of factual assertions**.** Consistent with Rule 6.3(c), UFA consulted with the Public Advisor's Office on October 30, 2026, and received service lists on November 6, 2026. UFA has served this Petition on the four Commission officials specified in Rule 6.3(c), together with the additional recipients identified through that consultation, as reflected in the accompanying Certificate of Service.[27]

[25] Stats. 2026, ch. 959 (AB 2700), § 2, adding Pub. Util. Code § 719.3(a), (b), (c)(1)(B)–(C), (d)(1), (d)(3), and (e); Cal. Const., art. IV, § 8(c)(1)
[26] D.24-10-011, Oct. 17, 2024, P.24-03-013, pp. 17-27, (denying petition that overlapped with active proceedings, issues considered within preceding 12 months).
[27] Rule 6.3(c), CPUC Rules of Practice and Procedure, effective May 1, 2021.

William B. Abrams, Executive Director, is eligible under Rule 1.11 and has verified supported factual assertions on behalf of UFA, following the UFA Board's written authorization.[28] All statements purporting to be based on personal knowledge have a sufficient evidentiary basis. UFA followed the CPUC electronic-filing and service requirements in force on the actual filing date. This 2026 filing will use the Commission's May 2021 Rules of Practice and Procedure. Rule 6.3(d) generally provides a 30-day response period, and a 10-day reply period unless changed by the assigned ALJ.

XI. CONCLUSION AND REQUEST FOR RELIEF

For the foregoing reasons, The Utility Fire Alliance respectfully requests that the Commission grant this Petition and take the following actions to develop pathways to full wildfire victim restitution as contemplated by AB 2700 and pursuant to Public Utilities Code § 719.3:

1. Grant this petition under Public Utilities Code § 1708.5 and Rule 6.3;
2. Institute, on or promptly after January 1, 2027, an expedited and appropriately scoped OIR to implement the Commission's responsibilities under Public Utilities Code § 719.3 to established pathways to full fire victim restitution and consider Appendix A;
3. Require proposals for the restitution pathway(s) to identify sources of funding, proportional interim payments where appropriate, and milestones toward full victim compensation;
4. Preliminarily categorize the OIR as quasi-legislative while expressly authorizing evidentiary fact development, hearings or workshops as needed, and party discovery under Article 10;
5. Name appropriate electrical corporations as respondents and require standardized financial and restitution-related disclosures;
6. Adopt the proposed regulation in Appendix A, or substantially similar procedural requirements, after notice and opportunity for comment;
7. Establish the five-track scope described in this petition, as further described in Appendix B or a substantially similar scope;
8. Hold public participation hearings or equivalent public forums and technical workshops that provide meaningful access for wildfire survivors, businesses, ratepayers, and fire-affected communities;

[28] Rule 1.11, CPUC Rules of Practice and Procedure, effective May 1, 2021.

9. If outside technical experts are retained, use an independent and transparent scope, procurement, conflict-screening, and disclosure process;
10. Issue a Rule 8.2(d) ruling requiring public reporting of substantive ex parte communications concerning the § 719.3 recommendations;
11. Adopt an expedited schedule substantially consistent with Section VII and Appendix B, with sufficient time for public review and comments, and in consideration of ongoing harms due to the lack of fire victim restitution, in advance of the January 1, 2028 deadline;
12. Complete the final § 719.3 report through a noticed and transparent Commission action; and
13. Grant such other and further relief as the Commission determines necessary and appropriate to faithfully carry out § 719.3.

Dated: November 9, 2026

Respectfully submitted,

THE UTILITY FIRE ALLIANCE, A NONPROFIT PUBLIC BENEFIT CORPORATION

/s/ William B. Abrams
William B. Abrams
Executive Director / Authorized Representative
The Utility Fire Alliance
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VERIFICATION UNDER RULE 1.11

I, William B. Abrams, declare:

I am the Executive Director and a duly appointed officer of The Utility Fire Alliance, the petitioner in this matter, and am authorized to make this verification on its behalf. I have reviewed the foregoing Utility Fire Alliance Petition to adopt, amend, or repeal a regulation pursuant to Pub. Util. Code § 1708.5 and concerning the development of a path to full wildfire restitution under Public Utilities Code § 719.3, including its appendices. The factual statements in the foregoing document and attached appendices are true of my own knowledge, except as to matters stated on information or belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 9, 2026, at Santa Rosa, California.

/s/ William B. Abrams
William B. Abrams
Executive Director and Authorized Officer
The Utility Fire Alliance

APPENDIX A – PROPOSED REGULATION

AB 2700 FIRE VICTIM RESTITUTION PATH DEVELOPMENT RULES

APPENDIX A – PROPOSED REGULATION

AB 2700 FIRE VICTIM RESTITUTION PATH DEVELOPMENT RULES

Proposed for consideration pursuant to Public Utilities Code §§ 719.3, 701, 1701, and 1708.5 and CPUC Rule 6.3:

Rule 1. Purpose, Class and Applicability. These rules govern the Commission's process for developing restitution mechanisms, benchmarks, and pathways to full restitution, and the associated reporting required by Public Utilities Code § 719.3. The regulated class consists of electrical corporations, as defined in Public Utilities Code § 218, that are subject to the Commission's jurisdiction. These rules apply prospectively to that class, with utility information-submission requirements limited to matters reasonably necessary to effectively carry out § 719.3.

Rule 2. Formal Proceeding. The Commission shall develop the § 719.3 required restitution pathway(s) through a formal public proceeding that provides a docketed record, reasonable opportunities for party participation, public comment, discovery and evidentiary fact development, technical workshops, and such hearings as the Commission determines necessary.

Rule 3. Standardized and Proportionate Information Requirements. Each respondent electrical corporation shall provide, in a form and schedule established by the Commission, within its lawful possession, custody or control, information reasonably necessary to evaluate the restitution mechanisms identified in § 719.3, including relevant information concerning dividends, retained earnings, equity contributions, debt capacity, bonds, structured or unstructured debt, existing wildfire-related financial structures, liquidity, credit considerations, and other financial tools. The Commission may require supplemental information and will permit reasonable party discovery consistent with Article 10 of the Rules of Practice and Procedure. Information requests should identify the unresolved analytical issue that additional production would address. Requests concerning nonparties or records outside a respondent's possession, custody, or control shall proceed through applicable lawful procedures.

Rule 4. Ratepayer Neutrality and Restitution Funding. No recommended restitution mechanism developed under § 719.3 shall authorize rate recovery for restitution payments. Analyses presented in the proceeding shall separately identify any potential ratepayer effects and shall not assume recovery of restitution payments through Commission-authorized rates.

Rule 5. Verified Restitution Shortfall Methodology. The Commission shall establish a transparent methodology for assessing verified restitution shortfalls consistent with the definitions in § 719.3(a). The methodology shall identify data sources, validation procedures, aggregation methods, treatment of prior payments and relevant offsets, and protections for confidential or personally identifying information. The Commission shall also evaluate the time value of money associated with unpaid restitution, including accrued interest on debt or equivalent financial losses, measured from the date compensation was legally due or reasonably should have been paid through the actual or projected date of payment in full, using transparent and legally supportable rates and assumptions. Such amounts shall be separately identified and evaluated for inclusion in recommended restitution mechanisms, consistent with applicable law and any additional statutory authorization required. The public analysis shall report the statutory determination measure separately from actual distributions and any estimated remaining unpaid balance while protecting personally identifying information.

Rule 6. Public and Community Participation. The Commission shall provide meaningful opportunities for wildfire victims, fire-affected businesses and communities, residential and small commercial utility customers, consumer representatives, local governments, Tribes where applicable, and other interested persons to participate. The Commission shall use public forums, workshops, written public comment, remote access, and other appropriate mechanisms to facilitate participation, including formal public participation hearings.

Rule 7. Independent Technical Analysis. If the Commission uses outside consultants or experts in developing the § 719.3 recommendations as part of the proceeding, it shall use appropriate procurement and conflict-screening procedures; publicly describe the consultant's scope of work and material assumptions to the extent lawful; and provide parties a reasonable opportunity to review and respond to nonconfidential methodologies and analyses on which the Commission may rely. The Commission should also consider such parties as part of the decisional process for selecting and/or contracting with any outside consultants or experts. However, while parties may comment on proposed analytical questions, qualifications, and disclosed conflicts of prospective consultants, the ultimate consultant selection, procurement, and contract administration shall remain with the Commission.

Rule 8. Transparency of Substantive Communications. For any quasi-legislative proceeding implementing § 719.3, the assigned Commissioner should, pursuant to Rule 8.2(d), require

reporting of substantive ex parte communications concerning the report, verified-shortfall methodology, utility financial capacity, financing mechanisms, consultant scope or selection, proposed findings, or recommendations. Reporting requirements shall apply neutrally to all interested persons. Independent of those decision, nonconfidential data and analyses materially relied on for the restitution recommendations should, where lawful, be accessible for stakeholder review and comment.

Rule 9. Confidentiality. Confidential treatment shall be no broader than necessary to protect information entitled to protection by law. Where practicable, the Commission shall use redaction, aggregation, protective orders, or other means that permit maximum public disclosure of methodologies, categories of information, and nonconfidential conclusions.

Rule 10. Draft Report and Comment. Before finalizing the § 719.3 recommendations and associated report, the Commission shall publish or serve a draft report or equivalent proposed findings and recommendations and provide a reasonable opportunity for party and public comment and reply.

Rule 11. Timelines and Benchmarks. The proceeding schedule shall permit the Commission to complete the § 719.3 pathway(s) definition and associated reporting no later than January 1, 2028. The Commission shall develop the timelines and benchmarks for achieving full fire victim compensation required by § 719.3. The record shall evaluate each proposed mechanism's funding capacity, payment timing, proportional interim-payment options where appropriate, and full-compensation benchmarks.

Rule 12. No Implementation Without Further Statutory Authority. Nothing in these rules authorizes implementation of a restitution mechanism in violation of § 719.3(g). The purpose of these rules is to develop the factual record and analysis, to identify fire victim recovery pathways and recommendations required by § 719.3.

APPENDIX B – UFA PROPOSED OIR SCOPE AND MILESTONE SCHEDULE

APPENDIX B – UFA PROPOSED OIR SCOPE AND MILESTONE SCHEDULE

This appendix further organizes the five substantive tracks as described in Section V of the Petition, together with the transparency and governance issues described in Section VI.

1) Proposed OIR Scope

UFA recognizes that the Commission will establish the final category, issues, and schedule through the OIR and Scoping Memo but proposes these issue areas to ensure that the process addresses the substantive mechanisms and timelines in § 719.3. In keeping with these goals, UFA proposes the following as a preliminary scoping framework to begin upon the actual commencement of an OIR and to preserve the January 1, 2028 statutory deadline:

Issue Area 1 – Verified Restitution Shortfalls

- What data and methodology should the Commission use to quantify verified restitution shortfalls under § 719.3(a)?
- What aggregate information can be made public while protecting claimant privacy?
- What validation and reconciliation procedures are needed?
- How will the Commission assess the time value of unpaid restitution, accrued interest on associated debts, and the economic consequences of delayed compensation?
- What total and fire-specific unpaid balances should inform the development of payment mechanisms, proportional interim payments and full-compensation milestones?

Issue Area 2 – Financial Mechanisms

- What non-ratepayer mechanisms listed in § 719.3 are the most optimal financially and have plausible non-ratepayer funding capacity and in what amounts?
- What non-ratepayer mechanisms listed in § 719.3 appropriately balance the financial interests of utilities with the full financial recovery of wildfire survivors, similarly situated businesses and California's fire-affected communities?
- How would liquidity, credit and debt terms affect timing of victim restitution payments?
- What utility financial information is necessary to assess those mechanisms?
- What payment schedules and benchmarks can achieve full victim compensation while supporting utility financial stability?

Issue Area 3 – Public Participation

- What public forums, workshops, hearings and accessible participation mechanisms are needed to ensure broad public participation?
- How should fire survivor and business recovery evidence be incorporated into the record?

Issue Area 4 – Independent Analysis

- What outside expertise, if any, is necessary?
- What conflict-screening, methodology-disclosure, and peer-review protections should apply?

Issue Area 5 – Transparency and Governance

- What ex parte reporting rule should apply under Rule 8.2(d) to improve the record?
- What confidentiality protocol will maximize public access while protecting legally confidential information?
- How should parties reasonably be provided with discovery rights related to utility financials for the purposes of assessing the relative effectiveness of proposed restitution mechanisms?
- How will the Commission preserve decisional independence and an auditable record?

Issue Area 6 – Final Report and Legislative Recommendations

- What type of findings, timelines, benchmarks, and recommended pathways to full fire victim restitution should appear in the final report?
- What concrete mechanisms or combination of mechanisms can be recommended as pathways to full restitution for the PG&E 2015-2018 fire victims under § 719.3(d)(1)?
- What concrete mechanisms or combination of mechanisms can be recommended path(s) to full restitution for 2025 SCE Eaton Fire victims and other similarly situated utility-caused fire victims under § 719.3(d)(2)?
- For each recommended restitution path, what evidence supports it?
- What are the tradeoffs among the proposed restitution paths in terms of timeliness, shareholder contributions, financial stability for victims and utilities, etc.?

2) Proposed OIR Schedule

UFA understands that the proposed dates and milestones may be adjusted by the Commission so long as the final schedule preserves adequate fact development, public and party participation, and meaningful review before the statutory deadline. The need to expeditiously address the previously defined scope given the ongoing harms to fire victims awaiting necessary

recovery dollars to rebuild their homes and their lives must be balanced with the need to fully adhere to the provisions within § 719.3. Given these scope and timing constraints, UFA proposes the following preferred schedule assuming January 2027 commencement. The following milestones may be adjusted and conducted concurrently if commencement occurs later, while preserving the statutory deadline:

Target	**Milestone**
January 2027	Commission institutes OIR; identifies respondents; preliminary category and scope; appoints Commissioner/ALJ.
February 2027	Prehearing conference; party appearances; discovery protocol; confidentiality/protective-order process; ex parte transparency ruling.
March 2027	Scoping Memo; standardized utility data requirements; initial verified-shortfall data plan; consultant decision and scope process if needed.
March-May 2027	Initial utility productions and party discovery; shortfall-data reconciliation; technical workshops to weigh the relative effectiveness of funding mechanisms.
April-June 2027	Regional and virtual survivor/business/community public forums; written public comment period.
June-August 2027	Expert testimony/analysis on financing mechanisms; supplemental discovery; workshops; rebuttal analyses.
September 2027	Commission staff/consultant preliminary findings or technical report placed on the record.
October 2027	Draft § 719.3 report and proposed recommendations released for party and public comment.
October-November 2027	Opening and reply comments; final public workshop if necessary; record closes.
December 2027	Commission publicly considers and adopts final report/recommendations at a noticed voting meeting or by comparably transparent final action.
No later than January 1, 2028	Final § 719.3 report completed and transmitted/published as required by law.