BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Petition of the City and County of San Francisco for a Valuation of Certain Pacific Gas & Electric Company Property Pursuant to Public Utilities Code Sections 1401-1421.	P.21-07-012

MOTION FOR LEAVE TO SUBMIT CONFIDENTIAL VERSION OF THE CITY AND COUNTY OF SAN FRANCISCO'S REPLY IN SUPPORT OF ITS MOTION FOR AN ORDER REQUIRING PACIFIC GAS AND ELECTRIC COMPANY TO OBTAIN COMMISSION AUTHORIZATION UNDER SECTION 851 BEFORE DISPOSING OF SUBSTATION I, AND FOR A PRELIMINARY INJUNCTION PRESERVING THE STATUS QUO PENDING THAT DETERMINATION UNDER SEAL

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CITY AND COUNTY OF SAN FRANCISCO

Dated: November 12, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U 338-E) For Approval of Its 2026 ERRA Forecast Proceeding Revenue Requirement	Application No. 25-05-008

MOTION FOR LEAVE TO SUBMIT CONFIDENTIAL VERSION OF THE CITY AND COUNTY OF SAN FRANCISCO'S REPLY IN SUPPORT OF ITS MOTION FOR AN ORDER REQUIRING PACIFIC GAS AND ELECTRIC COMPANY TO OBTAIN COMMISSION AUTHORIZATION UNDER SECTION 851 BEFORE DISPOSING OF SUBSTATION I, AND FOR A PRELIMINARY INJUNCTION PRESERVING THE STATUS QUO PENDING THAT DETERMINATION UNDER SEAL

Pursuant to Rule 11.4 of the California Public Utilities Commission's Rules of Practice and Procedure, the City and County of San Francisco (City) hereby submits this motion for leave to file under seal the confidential version of its November 12, 2026 *Reply in Support of its Motion for an Order Requiring Pacific Gas and Electric Company (PG&E) to Obtain Commission Authorization Under Section 851 Before Disposing of Substation I, and for a Preliminary Injunction Preserving the Status Quo Pending that Determination* (Reply) in the above-captioned proceeding.

The Reply contains certain information from documents PG&E has claimed are confidential. Specifically, the Motion references and reproduces portions of:

- *PG&E's Opposition to the City's Motion for an Order Requiring Pacific Gas and Electric Company (PG&E) to Obtain Commission Authorization Under Section 851 Before Disposing of Substation I, and for a Preliminary Injunction Preserving the Status Quo Pending that Determination* (Opposition), and
- *Declaration of Satvir Nagra in Support of PG&E's Opposition to the City's Motion for an Order Requiring Pacific Gas and Electric Company (PG&E) to Obtain*

Commission Authorization Under Section 851 Before Disposing of Substation I, and for a Preliminary Injunction Preserving the Status Quo Pending that Determination (Nagra Declaration).

PG&E has designated relevant portions of its Opposition (citing the Nagra Declaration) and the Nagra Declaration as confidential. PG&E has claimed that portions of the declaration contain sensitive information about PG&E's electric infrastructure, that this information is not available to the public and discusses the design of key components of Mission Substation, Substation I, and the surrounding infrastructure, as well as PG&E's internal analyses regarding reliability and resiliency.

The City does not, at this time, dispute that the information designated in the Nagra Declaration is confidential, and relies on PG&E's representations.

The City also includes information the City claims is confidential in Exhibit A to the *Declaration of Joshua M. Keene in Support of the City's Reply in Support of its Motion for an Order Requiring Pacific Gas and Electric Company (PG&E) to Obtain Commission Authorization Under Section 851 Before Disposing of Substation I, and for a Preliminary Injunction Preserving the Status Quo Pending that Determination* (Keene Declaration). Exhibit A is an updated Letter of Intent to purchase Substation I, and includes an offer price. The offer price is confidential because the disclosure of that offer price could economically harm the City by impacting the prices offered by other parties for the property.

To the City's knowledge, the information in these documents is not already public, and cannot be aggregated, redacted, summarized, or otherwise protected in a way that allows partial disclosure.

For the foregoing reasons, the City moves to file the confidential version of its Reply and the Keene Declaration in the above-captioned docket under seal.

Respectfully submitted,



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November 12, 2026

ATTACHMENT A

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Petition of the City and County of San Francisco for a Valuation of Certain Pacific Gas & Electric Company Property Pursuant to Public Utilities Code Sections 1401-1421.	P.21-07-012

[PROPOSED] ADMINISTRATIVE LAW JUDGE RULING GRANTING MOTION FOR LEAVE TO SUBMIT CONFIDENTIAL VERSION OF THE CITY AND COUNTY OF SAN FRANCISCO'S REPLY IN SUPPORT FO ITS MOTION FOR AN ORDER REQUIRING PACIFIC GAS AND ELECTRIC COMPANY TO OBTAIN COMMISSION AUTHORIZATION UNDER SECTION 851 BEFORE DISPOSING OF SUBSTATION I, AND FOR A PRELIMINARY INJUNCTION PRESERVING THE STATUS QUO PENDING THAT DETERMINATION UNDER SEAL

On November 12, 2026, the City and County of San Francisco (City) submitted a *Motion for Leave to Submit Confidential Version of the City and County of San Francisco's Reply in Support of its Motion for an Order Requiring Pacific Gas and Electric Company (PG&E) to Obtain Commission Authorization Under Section 851 Before Disposing of Substation I, and for a Preliminary Injunction Preserving the Status Quo Pending that Determination* (Motion for Leave), seeking leave to file under seal the confidential version of the City's November 12, 2026 *Reply in Support of its Motion for an Order Requiring Pacific Gas and Electric Company (PG&E) to Obtain Commission Authorization Under Section 851 Before Disposing of Substation I, and for a Preliminary Injunction Preserving the Status Quo Pending that Determination* (Reply) in the above-captioned proceeding. Certain information contained in the Reply is information PG&E claims is confidential. The City does not challenge PG&E's designation of such information as confidential.

IT IS HEREBY ORDERED that the City's Motion may be filed under seal.

DATED: _____ By:_____
Administrative Law Judge