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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Approval of Regionalization Proposal. (U 39 M)	Application 20-06-011 (Filed June 30, 2020)

PETITION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 M) FOR MODIFICATION OF D.22-06-028

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Dated: November 13, 2026

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I. INTRODUCTION AND PETITION SUMMARY

Pursuant to Rule 16.4 of the Commission's Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E) submits this Petition for Modification ("PFM") in order to seek clarifying changes to Decision (D.) 22-06-028, *Decision Approving a Multi-Party Settlement Agreement in Part and a South San Joaquin Irrigation District Settlement in Totality* (Decision) issued in the above captioned proceeding.

Specifically, PG&E seeks to add clarifying conclusions of law to the Decision that PG&E retains authority to modify the non-officer job titles of the regional leadership positions while preserving the governance framework and operational objectives of the Regional Service Model (RSM), which was adopted and implemented as a condition of resolving PG&E's 2019 Chapter 11 bankruptcy.

The remainder of this PFM provides (1) relevant procedural history regarding PG&E's post-bankruptcy reorganization, the development of the RSM through A.20-06-011, and the provisions of D.22-06-028 implicated by the instant PFM; (2) context for PG&E's decision to modify the job titles for the Regional Vice President and Regional Safety Director roles as Heads of Region and Regional Safety Leaders, respectively; and (3) an explanation of why this Petition is appropriate to file more than one year after D.22-06-028 was issued, as required by Commission Rule 16.4(d), among other procedural requirements.

This Petition is accompanied by a declaration affirming that new facts presented in this Petition regarding PG&E's experience implementing the RSM are true and correct, as required by Commission Rule 16.4(b).

II. PROCEDURAL HISTORY

The Regional Service Model emerged from the extensive regulatory, legislative, and bankruptcy proceedings that followed PG&E's 2019 Chapter 11 filing, reflecting a shared objective of improving the company's accountability and responsiveness to the communities it serves. Those proceedings were shaped by a broader recognition that, as a monopoly provider of electric and gas distribution service, PG&E occupies a unique position. Customers generally do not have the ability to choose another distribution service provider, making local transparency, responsiveness, and accountability essential components of the company's relationship with customers, local governments, tribes, community organizations, and other stakeholders. Indeed, PG&E provides electric and natural gas service to approximately 16 million people across a 70,000-square-mile service territory in Northern and Central California, serving communities across 47 counties and 247 cities that range from dense urban centers to remote rural and forested regions, encompassing diverse economic, geographic, cultural, and environmental conditions.

Against this backdrop, state policymakers, regulators, local elected officials, ratepayer advocates, myriad other stakeholders, and PG&E explored ways to strengthen community engagement and incorporate local perspectives into company decision-making. Those efforts culminated in the development of a regionalized organizational structure—referred to interchangeably herein as the Regional Service Model, RSM, Regionalization, and Regional Restructuring—which divided PG&E's service territory into five sub-regions and established dedicated regional leadership within each region. The model was intended to bring leaders closer to customers and communities, elevate local concerns within the company, improve responsiveness to regional needs, and strengthen accountability to customers.

The resulting RSM was intended to serve more than an organizational function. It was designed to create durable pathways for community engagement and to help ensure that local needs, circumstances, and priorities would be reflected in PG&E's planning, operations, and customer service activities. The model sought to provide customers and community stakeholders with identifiable regional leaders who could develop local relationships, understand regional concerns, and advocate for those concerns within the company's decision-making processes. By placing leadership closer to the communities it serves, the RSM was designed to improve operational decision-making and advance utility performance in areas such as safety, reliability, emergency response, and customer care by ensuring that local conditions, operational realities, and community perspectives informed company actions. This Petition does not seek to alter these objectives.

PG&E remains committed to the RSM framework adopted in A.20-06-011 and to maintaining meaningful opportunities for customers, local governments, tribes, community organizations, and other stakeholders to engage with company leadership embedded into each of the five regions to ensure that customer voice and the needs of the hometowns PG&E serves remain at the heart of utility decision-making. Rather, the issue presented here is whether PG&E has authority to modify the job titles for these non-officer leadership positions while preserving the governance framework, community engagement objectives, and operational intent of the RSM. The history of the RSM, detailed below, demonstrates that its purpose has always been to promote accountability, responsiveness, and community engagement, not to prescribe a particular management job classification.

A. PG&E's 2019 Bankruptcy and Plan of Reorganization

In the aftermath of multiple catastrophic wildfires for which PG&E's electric infrastructure was the source of ignition, PG&E faced billions of dollars in potential wildfire liabilities, severe deterioration in its financial condition, and significant public concern regarding the utility's safety culture and governance.

On January 29, 2019, PG&E and its parent corporation filed voluntary petitions for relief under Chapter 11 of the United States Bankruptcy Code. The bankruptcy filing occurred against the backdrop of legislative efforts to stabilize California's electric utility sector, compensate wildfire victims, and protect ratepayers from the consequences of utility insolvency. Those efforts culminated in the enactment of Assembly Bill (AB) 1054, which established a statewide wildfire insurance framework and imposed enhanced safety, governance, and oversight requirements on the state's large electrical corporations. PG&E's emergence from bankruptcy was therefore not merely a financial restructuring, but a process closely intertwined with regulatory and legislative objectives intended to restore public trust, improve utility governance, and reduce future wildfire risk.

On September 26, 2019, the Commission opened Order Instituting Investigation ("OII"), I.19-09-016.[1] The OII was scoped "to afford parties the opportunity to be heard and comment on:" (1) any "[Commission] regulatory review resulting from a proposed plan of reorganization," (2) any "proposed settlement agreement resolving PG&E's Chapter 11 case between PG&E and Commission staff filed in connection with a plan, any regulatory approvals required pursuant to

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[1]/ I.19-09-016, O*rder Instituting Investigation on the Commission's Own Motion to Consider the Ratemaking and Other Implications of a Proposed Plan for Resolution of Voluntary Case filed by Pacific Gas and Electric Company, pursuant to Chapter 11 of the Bankruptcy Code, in the United States Bankruptcy Court, Northern District of California, San Francisco Division, In re Pacific Gas and Electric Corporation and Pacific Gas and Electric Company, Case No.19-30088.*

Public Utilities Code Section 3292 in order for PG&E to become eligible to participate in the wildfire fund established pursuant to [AB] 1054," (3) "other regulatory approvals required by AB 1054," and (4) "any other matter that may need to be decided by this Commission in connection with a [reorganization] plan."[2] In scoping the OII, the Commission also recognized the jurisdictional boundaries between it and of the Bankruptcy Court, noting:

> [W]hile the Commission regulates the relationship between public utilities and their ratepayers, the Bankruptcy Court is mostly concerned with the relationship between the debtor and its creditors. The Bankruptcy Code further explicitly recognizes that utility ratemaking is the province of governmental regulatory commissions….[3]

Accordingly, the OII created a forum for issues of state-law jurisdiction to be evaluated and submitted to the Bankruptcy Court for consideration to facilitate efficient resolution of PG&E's Chapter 11 case.[4] Parties to the OII engaged in extensive discovery before filing written testimony, briefs and comments.

On February 18, 2020, the Commission issued the *Assigned Commissioner's Ruling and Proposals* (ACR) "relating to the application of state law to the proposed plan of reorganization" and requested that Parties file supplemental testimony on the ACR Proposals.[5] ACR Proposal 6, "Regional Restructuring," mirrored a recommendation offered in PG&E's testimony to "create local operating regions to bring management closer to the customers they serve."[6] Regional Restructuring, as summarized by the Commission in ACR Proposal 6, would serve:

> [T]o assure [PG&E] is more responsive and accountable to the particular needs and circumstances of the customer base, improve customer service and safety at the local level,

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2/ OII, p. 2.

3/ *Id*., p. 4.

4/ *Id*., p. 6; *see also* Response of PG&E to OII (Oct. 11, 2019), p. 3.

5/ ACR, p. 1, available at: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M327/K303/327303409.PDF (accessed Nov. 3, 2026).

6/ *Id*., Appendix A, p. 7.

and include customer service focused metrics, such as interconnection, outage response and other localized safety issues.[7]

Evidentiary hearings to evaluate all ACR proposals, including Regional Restructuring, were held February 25, 2020, through March 4, 2020.[8]

In support of the regional service model, PG&E witnesses explained the potential value of the proposed RSM to build strong relationships with local communities and their elected leaders;[9] enhance customer care opportunities developed in partnership with diverse customer groups, including customers with disabilities, medically vulnerable customers, and customers with limited English capabilities;[10] and ensure that operational efficiencies developed at the centralized leadership level are not carried out absent consideration of local needs and perspectives.[11]

Following evidentiary hearings and post-hearing briefing, the ACR proposals became an integral part of the Commission's evaluation of PG&E's proposed Plan of Reorganization. The record developed regarding those proposals was subsequently presented to the United States Bankruptcy Court, Northern District of California, San Francisco Division (the Bankruptcy Court).

The Bankruptcy Court incorporated the Regional Restructuring proposal into the final Confirmed Plan, dissolving and reconstituting PG&E upon exiting bankruptcy. Among other things, the Confirmed Plan directed PG&E to (1) "seek to implement a regional restructuring plan," (2) "file an application with the CPUC by June 30, 2020 regarding its proposed

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7/ *Id*.

8/ D.20-05-053, p. 9.

9/ I.19-09-016, Transcript (Tr.) Vol. 5, 1001:25 to 1002:8, available at: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M328/K717/328717830.PDF (accessed Nov. 13, 2026).

10/ *Id.*, Tr. Vol. 2, 193:1-16, available at: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M328/K474/328474005.PDF (accessed Nov. 13, 2026).

11/ *Id.,* Tr. Vol. 5, 1019:1-10, available at: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M328/K717/328717830.PDF (accessed Nov. 13, 2026).

restructuring," and (3) "take interim steps in furtherance of its proposed regional restructuring."[12] More broadly, the Bankruptcy Court directed PG&E to "comply with and implement the provisions of" the ACR proposals "to the extent adopted by" and "as modified by" the Commission's final decision in I.19-09-016 approving PG&E's Plan of Reorganization.[13]

The Bankruptcy Court further recognized that the Commission would retain ultimate authority over implementation of the ACR proposals, including Regional Restructuring. The court explained that PG&E's compliance obligations would continue following emergence from bankruptcy and remain in place "except insofar as such provisions are in the future waived, modified or terminated by the CPUC."[14] Accordingly, while the Bankruptcy Court directed PG&E to take interim steps toward implementation of the RSM, it preserved the Commission's continuing regulatory jurisdiction to oversee, modify, or terminate those requirements through its own proceedings on a going forward basis.

B. Application of PG&E for Approval of Regional Restructuring Plan

Consistent with ACR Proposal 6 and the Confirmed Plan requirements, PG&E took interim steps to implement regional restructuring and, on June 30, 2020, filed Application (A.) 20-06-011 seeking approval of its Regionalization Proposal. Parties filed comments on the proposal on December 16, 2020. After considering those comments and input received during multiple stakeholder workshops, PG&E filed an Updated Regionalization Proposal on February 26, 2021. Parties submitted comments on the Updated Regionalization Proposal on April 2, 2021.

On May 9, 2022, the Commission issued its *Proposed Decision Approving a Multi-Party Settlement Agreement in Part and South San Joaquin Irrigation District in Totality*. Parties filed

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[12]/ *In re PG&E Corp*., No. 19-30088 (Bankr. N.D. Cal June 20, 2020), Order Confirming Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated June 19, 2020 (hereinafter "Confirmed Plan"), p. 17, lines: 1-4, ECF No. 8053, available at: https://restructuring.ra.kroll.com/pge/ (accessed Nov. 13, 2026).

[13]/ *Id.,* p. 16, lines 9-13.

[14]/ *Id.,* p. 16, lines 12-13.

opening and reply comments on the Proposed Decision (PD) in May 2022. On June 23, 2022, the Commission issued D.22-06-028, approving, with conditions, the Multi-Party Settlement Agreement (MPSA) among PG&E, California Farm Bureau Federation (CFBF), California Large Energy Consumers Association (CLECA), Center for Accessible Technology (CforAT), Coalition of California Utility Employees (CUE), Public Advocates Office at the California Public Utilities Commission (Cal Advocates), Small Business Utility Advocates (SBUA), and William B. Abrams. Through D.22-06-028, the Commission adopted, with modifications, PG&E's Updated Regionalization Proposal.

The parties to the MPSA recommended approval of PG&E's Updated Regionalization Proposal together with: (1) a phased implementation approach; (2) stakeholder engagement requirements throughout implementation; and (3) guidance regarding recovery of human resources, information technology, and real estate costs associated with regionalization.

C. The Regional Service Model Adopted in D.22-06-028

D.22-06-028 established five service regions: (1) North Coast; (2) North Valley and Sierra; (3) Bay Area; (4) South Bay and Central Coast; and (5) Central Valley. These regions were designed to "coincide with county boundaries, group customers and communities with similar characteristics, operational risk, and safety considerations, and establish equitable regional sizes to improve overall operations." PG&E further proposed that each service region be led by a Regional Vice President (RVP) to improve local engagement, accelerate decision-making, and enhance accountability for operational and customer outcomes.

The Regional Service Model contemplated two complementary leadership tracks. First, each region would be led by an RVP serving as the principal regional leader responsible for community engagement, coordination of cross-functional activities, and accountability for regional operational and customer outcomes. The RVPs were intended to serve as PG&E's primary public-facing representatives within their respective service territories and to elevate local issues requiring coordination across multiple functional organizations.

Second, the proposal established a Regional Safety Director (RSD) position for each service region. Unlike the RVPs, the RSDs were not intended to serve as regional business leaders. Rather, the RSDs were designed to provide a direct connection between regional operations and PG&E's enterprise-wide Safety organization. The RSDs were responsible for monitoring and improving employee, contractor, and public safety performance within their assigned regions; providing independent oversight and assessment of safety practices; identifying and escalating safety concerns; and promoting consistency with companywide safety objectives and risk-management practices.

Consistent with these distinct functions, the Updated Regionalization Proposal contemplated separate reporting relationships for the two leadership tracks. The RVPs were connected to centralized executive leadership through the Customer organization, reporting up to the Executive Vice President and Chief Customer Officer (now the Utility President and EVP of Customer & Corporate Affairs) and the Utility CEO.[15] The RSDs, by contrast, reported to the Chief Safety Officer and were aligned with PG&E's enterprise Safety organization while supporting regional leadership on safety matters. PG&E explained that these reporting relationships would connect regional leaders to senior company decision-makers capable of escalating and mobilizing responses to complex cross-functional issues.

Accordingly, the governance structure adopted through D.22-06-028 contemplated not only the creation of five geographic service regions, but also parallel regional and enterprise leadership structures. RVPs served as the primary connection between regional operations and executive leadership responsible for customer and community engagement, while RSDs

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[15]/ Application 20-06-011 (Feb. 26, 2021), Updated Regionalization Proposal, p. 6 ("The [Plan of Reorganization] POR Decision [D.20-05-053] requires the Regional Vice Presidents to report to the Utility's CEO and President. Since the role and function of the President has been replaced by three executive officers, the Regional Vice Presidents will report directly to the Executive Vice President and Chief Customer Officer (who, in combination with the Executive Vice President and Chief Operating Officer and the Executive Vice President of Engineering and Strategy, will serve as a functional equivalent in place of the Utility President."). Now that PG&E once again has a Utility President (*i.e.,* Carla Peterman, the Utility President and EVP of Customer & Corporate Affairs), the Heads of Region will once again maintain a reporting relationship with the Utility President, as shown in Figure 1 on page 13 herein.

provided an independent connection between regional operations and the Company's centralized safety and risk-management functions. Together, these complementary reporting structures were intended to ensure both regional responsiveness and alignment with PG&E's broader corporate leadership, safety, and operational objectives.

III. THE COMMISSION SHOULD CLARIFY PG&E'S AUTHORITY TO IMPROVE THE RSM CONSISTENT WITH THE OBJECTIVES OF D.22-06-028

Since adoption of regionalization, PG&E has gained substantial experience implementing and operating the regional structure approved in D.22-06-028. That experience reveals that the RSM's success is driven principally by the strength of its regional teams, the relationships those teams maintain with local governments and community stakeholders, and their familiarity with regional conditions and priorities.

Regional leaders serve as a critical bridge between centralized corporate functions and the communities PG&E serves by facilitating two-way communication, issue escalation, strategic planning, and coordination across the enterprise. Importantly, PG&E's experience also demonstrates that the core objectives of regionalization are achieved through sustained local engagement, clear accountability, effective issue escalation, and strong connections between regional and centralized leadership structures.

As part of broader efforts to improve organizational effectiveness across the Company, PG&E is streamlining its management structures, clarifying reporting relationships, and better aligning leadership roles with the functions they perform. These efforts promote efficient decision-making, avoid unnecessarily complex management structures, and ensure that personnel closest to PG&E's operations, customers, and communities are empowered to identify issues, elevate concerns, and facilitate timely resolution.

PG&E believes the core objectives of regionalization can continue to be achieved even if certain leadership positions are re-titled, re-leveled, or repositioned. Accordingly, PG&E seeks clarification that D.22-06-028 permits PG&E to modify the job titles and organizational leveling of Regional Vice Presidents and Regional Safety Directors, provided that such changes do not

alter the substantive functions, responsibilities, or governance objectives approved by the Commission. As discussed below, PG&E's proposed changes in its leadership model preserve the fundamental structure and objectives of the RSM while allowing the Company to better align leadership positions with the responsibilities they perform and the operational needs they support.

A. The Commission Should Clarify PG&E's Authority to Retitle and Relevel the Regional Vice President Positions While Preserving Their Regional Leadership Functions

As described above, the Regional Service Model approved in D.22-06-028 contemplated regional leaders who would serve as PG&E's principal representatives within each service territory, maintain strong relationships with local governments and community stakeholders, facilitate issue identification and escalation, and provide accountability for regional operational and customer outcomes. The Commission's review of the Regional Service Model focused on these functions and responsibilities and on the role regional leadership would play in advancing the objectives of regionalization.

Notably, neither the MPSA nor the underlying Regionalization Proposal identified the Vice President title itself as essential to achieving those objectives. Rather, the approved framework emphasized the responsibilities, authority, visibility, and community engagement functions performed by regional leadership. In PG&E's experience, those functions have proven to be the principal drivers of the model's success.

After nearly five years of operating under the Regional Service Model, PG&E has determined that those functions can continue to be performed effectively without maintaining five separate Vice President-level positions. PG&E has found that the effectiveness of regional leadership derives principally from the strength of regional teams, their familiarity with local conditions, their relationships with community stakeholders, and their ability to connect regional operations with centralized decision-makers, rather than from a particular title or organizational level.

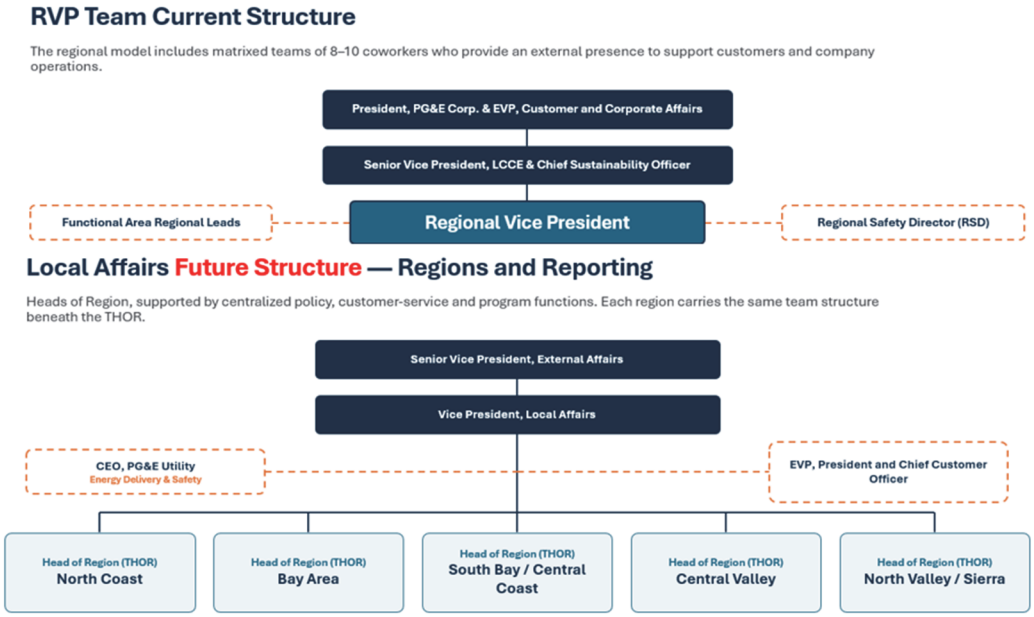
Accordingly, PG&E seeks clarification that D.22-06-028 permits the Company to retitle and relevel the current Regional Vice President positions as "Heads of Region." Depending on organizational needs and the qualifications and experience of individual leaders, Heads of Region positions may be classified at either the Director or Senior Director level. Regardless of title or organizational level, however, the positions would continue to perform the same core regional leadership functions approved by the Commission and would remain responsible for maintaining the community engagement, regional accountability, and issue-escalation responsibilities that are central to the Regional Service Model.

PG&E has created and seated a Vice President of Local Affairs who is responsible for coordinating and supporting the Company's regional organizations. Under this structure, the five Heads of Region would report to the VP of Local Affairs within the Executive Vice President and Chief Customer Officer organization. The Heads of Regions would maintain a “dotted-line” or “skip-level” reporting relationship to the Utility CEO and the Executive Vice President and Chief Customer Officer.

This structure would preserve the direct connection between regional leadership and senior executive leadership contemplated by the Regional Service Model while providing a more streamlined and consistent framework for regional oversight. Organizational charts comparing the current RVP Team structure to the proposed team structure are included in

Figure 1 below for comparison.

Figure 1. Org Chart for Proposed "Head of Region" Positions



The proposed structure would provide PG&E greater flexibility to staff these important regional leadership positions. Rather than limiting the roles to Vice President-level positions, the Head of Region positions could be filled by qualified Directors or Senior Directors with the operational, stakeholder-engagement, customer, and community-relations experience necessary to effectively perform the functions of regional leadership. This flexibility would support succession planning, facilitate continuous staffing of these critical positions, and promote alignment between the organizational level of regional leadership positions and comparable roles elsewhere in the Company. PG&E believes these proposed changes are consistent with the objectives and requirements of D.22-06-028 because they preserve the core functions of regional leadership, maintain regional accountability and community engagement, and retain the governance framework connecting regional operations to centralized executive leadership.

B. The Commission Should Clarify PG&E's Authority to Retitle and Relevel the Regional Safety Director Positions While Preserving Their Safety Oversight Functions

As described above, the Regional Service Model approved in D.22-06-028 contemplated a Regional Safety Director (RSD) assigned to each service region. Unlike the Regional Vice

Presidents, who function as regional leaders and primary community representatives, the RSDs serve as a direct connection between regional operations and PG&E's Enterprise Safety organization. The RSDs provide regional safety leadership, identify and escalate safety concerns, monitor safety performance, and help ensure consistency with companywide safety objectives and risk-management practices.

Through nearly five years of operating under the Regional Service Model, PG&E has identified opportunities to better align these positions with the broader Safety and Risk governance structure while preserving their substantive responsibilities. Unlike the Regional Vice President positions, which operate within a distinct regional leadership structure, the RSD positions are embedded within the Enterprise Safety organization. As a result, organizational effectiveness depends not only on the functions performed by the positions, but also on clear reporting relationships and lines of authority within the broader operational leadership structure.

PG&E has found that maintaining Director-level Regional Safety Director positions in circumstances where those positions report to other Director-level leaders can create ambiguity regarding decision-making authority, accountability, and organizational responsibilities. Better alignment of organizational levels and reporting relationships would promote clearer authority, improve issue escalation pathways, and support more efficient decision-making while preserving the functions approved by the Commission.

Accordingly, PG&E seeks clarification that D.22-06-028 permits the Company to retitle the Regional Safety Director positions as "Regional Safety Leaders." Depending on organizational needs and the qualifications and experience of individual leaders, the Regional Safety Leader positions may be classified at either the Manager or Director level. Regardless of title or organizational level, however, the positions would continue to perform the same core safety oversight, issue-identification, risk-escalation, and regional safety leadership functions contemplated by the Regional Service Model.

Importantly, the proposed changes would not alter the role of regional safety leadership within PG&E's Safety and Risk governance structure. Regional Safety Leaders would continue to serve as an independent connection between regional operations and PG&E's centralized Safety and Risk organization, ensuring that regional safety concerns and emerging risks continue to be elevated and addressed through established enterprise governance processes.

PG&E believes these proposed changes are consistent with the objectives and requirements of D.22-06-028 because they preserve the substantive safety functions, accountability mechanisms, and governance objectives approved by the Commission.

Nevertheless, because D.22-06-028 references Regional Safety Directors as part of the approved Regional Service Model governance framework, PG&E seeks clarification through this Petition for Modification, out of an abundance of caution and in the interest of regulatory transparency.

IV. SPECIFIC PROPOSED MODIFICATIONS TO DECISION WORDING

Pursuant to Rule 16.4(b), PG&E proposes the following specific modifications to the Decision:

- Insert a new Conclusion of Law that reads: "PG&E has discretion to change the title of the Regional Vice Presidents to Heads of Region and determine the appropriate job level and pay scale for these positions."
- Insert a new Conclusion of Law that reads: "PG&E has discretion to change the title of the Regional Safety Directors to Regional Safety Leaders and determine the appropriate job level and pay scale for these positions."

V. PROCEDURAL MATTERS

A. The Timing of the Petition is Appropriate

Pursuant to Rule 16.4(d), PG&E submits that good cause exists to seek modification more than one year after issuance of D.22-06-028. The requested clarification is based on lessons learned in implementing and operating the RSM, as described herein.

That experience has demonstrated that the objectives of regionalization, including strong community engagement, regional accountability, effective issue identification and escalation, and robust connections between regional operations and centralized leadership will be preserved while providing PG&E greater flexibility to align leadership positions with operational needs and enterprise governance structures. The proposed modifications reflect insights gained through implementation of the RSM and are intended to improve organizational effectiveness without altering the functions, responsibilities, or governance objectives approved by the Commission.

Because the basis for the requested relief arose from experience gained after implementation of the RSM, need for this clarification could not reasonably have been evaluated at the time D.22-06-028 was issued. Accordingly, PG&E respectfully submits that consideration of this Petition is appropriate and consistent with Rule 16.4(d).

B. Proposed Schedule

Out of an abundance of caution and in the interest of regulatory transparency, PG&E is seeking clarification through this Petition for Modification to relevel the RVP positions to Head of Region roles and the RSD positions to Regional Safety Leader roles, consistent with the proposals described herein.

Concurrently with this PFM, PG&E will submit a letter to the Executive Director pursuant to Rule 16.6 to request that the Executive Director authorize PG&E to proceed with releveling while the PFM is pending. Timely resolution of this Petition would provide certainty regarding the future structure of regional leadership and regional safety governance, support

implementation of PG&E's broader organizational-effectiveness initiatives, and facilitate workforce and succession planning for these important positions. PG&E therefore respectfully requests that the Commission review and act on this Petition as expeditiously as practicable as proposed below:

Activity	Date
File PFM & Serve Rule 16.6 Letter	November 13, 2026
Intervenor Comments Due	December 11, 2026
PG&E Reply to Intervenor Comments	December 21, 2026
Commission Decision on PFM	March 2027

C. Stakeholder Engagement and Need for Hearings

In advance of filing this Petition, PG&E conducted stakeholder outreach to the Multi-Party Settlement Agreement (MPSA) stakeholders: the California Farm Bureau Federation (CFBF), the California Large Energy Consumers Association (CLECA), the Center for Accessible Technology (C4AT), the Coalition of California Utility Employees (CUE) the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), the Small Business Utility Advocates (SBUA), and William B. Abrams.

Because the parties to the MPSA have previously participated in discussions concerning the Regional Service Model and regional leadership structure, PG&E invited those stakeholders to participate in a stakeholder meeting on September 25, 2026 to discuss the proposal and provide feedback.[16] Representatives from Cal Advocates, CLECA, CFBF, and William Abrams attended the September 25 stakeholder meeting where PG&E provided information on its planned PFM, solicited stakeholder feedback, and answered stakeholder questions.

[16]/ At the time of the September 25 meeting, PG&E had not yet determined whether to re-level the Regional Safety Director positions; however, discussion around this proposed change was included in the draft PFM distributed to the MPSA parties on November 5, 2026.

On November 5, 2026, PG&E circulated a draft PFM and draft Rule 16.6 letter to the stakeholder group. In light of stakeholder feedback and questions, the draft Petition and 16.6 letter provided additional clarity regarding the justification for filing the Petition at this time, the impacts of the proposed changes on regional safety leadership positions, the relevant reporting relationships, and information on PG&E's broader efforts to continuously evaluate and refine its management structures, reporting relationships, and compensation practices, as described in greater detail in the 16.6 letter.

In response to PG&E's outreach, CUE indicated that it does not oppose the PFM. Mr. Abrams posed questions to PG&E, which PG&E attempted to answer through the circulated document drafts and through direct communications with Mr. Abrams. No other stakeholders responded to the opportunity to comment on the draft PFM to express support or opposition. PG&E remains committed to working collaboratively with stakeholders as the Commission considers this PFM.

PG&E has engaged proactively with stakeholders and provided multiple opportunities for feedback and discussion. This PFM presents a narrow request concerning the organizational level of regional leadership positions and does not propose modifications to the RSM structure, responsibilities, or objectives. Accordingly, it is PG&E's position that evidentiary hearings are likely not necessary, and that any questions of fact that may arise can be clarified in a written record.

D. Service

Pursuant to Rule 16.4(c), this PFM has been served on all parties to A.20-06-011, in which the Commission approved PG&E's Updated Regionalization Plan and related RSM requirements. Pursuant to Rule 16.4(f), any responses to this PFM must be filed within 30 days of the date of filing of this PFM and served on PG&E and all parties served with this PFM.

Correspondence and service to PG&E for this Petition should be addressed to:

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VI. CONCLUSION

Based on the foregoing, PG&E respectfully requests that the Commission modify D.22-06-028 as set forth herein.

Respectfully submitted,

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PACIFIC GAS AND ELECTRIC COMPANY

Dated: November 13, 2026

DECLARATION OF ANNA BROOKS

I, the undersigned, say:

I am an officer of PACIFIC GAS AND ELECTRIC COMPANY, a California corporation, and am authorized, pursuant to Code of Civil Procedure Section 466, paragraph 3, to make this declaration for that reason; I have read the foregoing Petition for Modification and I am informed and believe the matters therein are true and, on that ground, I allege that the matters stated therein are true.

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

Executed at Oakland, California, on November 13, 2026.

Anna Brooks

Vice President, Local Affairs

PACIFIC GAS AND ELECTRIC COMPANY