BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY (U39M) FOR AUTHORIZATION TO RECOVER COSTS RELATED TO ITS ENTERPRISE RESOURCE PLANNING AND GEOGRAPHIC INFORMATION SYSTEMS	Application 26-11-004

MOTION OF THE PUBLIC ADVOCATES OFFICE FOR EXTENSION OF TIME TO FILE RESPONSE TO MOTION FOR AUTHORITY TO ESTABLISH MEMORANDUM ACCOUNT

I. INTRODUCTION

Pursuant to Rule 11.6 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, the Public Advocates Office of the California Public Utilities Commission (Cal Advocates), submits this motion for extension of the time limit to respond to a motion submitted by Pacific Gas and Electric Company (U 39 M) (hereafter, PG&E) in the above-referenced proceeding.

II. PROCEDURAL BACKGROUND

On November 3, 2026, PG&E filed Application (A.) 26-11-004 with the Commission.[1] In A. 26-11-004, PG&E seeks to implement revenue requirements based on a combined forecasted cost of approximately $874.1 million for the period November 3, 2026, through December 31, 2030, so as to recover costs associated with modernizing PG&E's Enterprise Resource Planning (ERP) and Geographic Information System (GIS) platforms.[2] PG&E's total forecasted cost of this modernization is approximately $2.9 billion.[3]

On November 4, 2026, PG&E filed a motion to establish the "Enterprise Resource Planning and Geographic Information System Transformation Memorandum Accounts"

[1] See, *Application of Pacific Gas and Electric Company (U 39 M) for Authorization to Recover Costs Related to Its Enterprise Resource Planning and Geographic Information Systems* (Application), dated November 3, 2026.

[2] Application at 1.

[3] Application at 1.

(collectively, ERP/GIS Transformation Memorandum Accounts or Memorandum Accounts).[4] PG&E filed its Motion one day after it filed the Application and two days before the Application was placed on the Commission's Daily Calendar.[5]

As noted in its concurrent Motion for Party Status in this proceeding,[6] Cal Advocates has a statutory obligation to represent and advocate on behalf of the interests of public utility customers before the Commission and to obtain the lowest possible rate consistent with reliable and safe service levels and the state's environmental goals.[7]

III. REQUEST FOR EXTENSION OF TIME TO FILE RESPONSE TO MOTION

Rule 11.1 of the Commission's Rules of Practice and Procedure (Rules) requires any responses to written motions to be filed and served within 15 days of the date that the motion was served, except as otherwise provided in these Rules.[8] Rule 11.6 further provides that a party may seek an extension of any of the time limits established under the Commission's Rules.[9]

PG&E filed its Motion two days before the original Application was calendared. The Commission's Rules provide that any party seeking to submit a protest of an application has 30 days from the date the notice of the filing of the application first appears in the Daily Calendar to submit such a protest.[10] The procedural purpose of Rule 2.6 is to provide all interested parties a sufficient period to review the application and a clear deadline that corresponds to fair notice to all interested parties.

The Commission's Rules currently do not limit the filing of motions upon initiation of an application. As a result, applicants may submit an application and a motion related to that application, before the application is noticed in the Daily Calendar and before any intervenor has

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[4] See, *Motion of Pacific Gas and Electric Company (U 39 M) to Establish Enterprise Resource Planning and Geographic Information System Transformation Memorandum Accounts* (Motion), filed November 4, 2026, at 1.

[5] See, Daily Calendar, dated Friday, November 6, 2026, at 13 (assigning application number A.26-11-004 to the subject proceeding).

[6] See, *Motion of the Public Advocates Office for Party Status*, filed November 16, 2026, at 1-2.

[7] Pub. Util. Code, § 309.5.

[8] Rules of Practice and Procedure, Rule 11.1(e).

[9] Rules of Practice and Procedure, Rule 11.6.

[10] Rules of Practice and Procedure, Rule 2.6(a).

appeared in the matter. The unavoidable effect is that Cal Advocates and any other parties that intend to participate in the proceeding lose time to respond to the motion. Moreover, intervening parties are further prejudiced as they must oppose the motion, while simultaneously evaluating the newly filed application. Here, where the Motion was filed two days before the Application was placed on the November 6, 2026, Daily Calendar, Cal Advocates has lost two of the days it would otherwise have had to respond to the Motion.[11]

A two-day extension, however, would not avail Cal Advocates of any meaningful opportunity to respond to the Motion. The reduced time to respond to the Motion also coincides with Cal Advocates' and other potentially interested parties' efforts to draft their respective protests to the Application. Moreover, extending the time to respond to the Motion to the following week coincides with the Thanksgiving holiday when many parties' personnel are unavailable. Therefore, Cal Advocates respectfully requests the deadline for filing its response to the Motion be extended from November 19, 2026, to December 7, 2026, the deadline for the filing of protests under Rule 2.6.[12]

Rule 11.6 further requires a party seeking a time extension to make a good-faith effort to ask other parties to the proceeding whose interests may be affected by the extension to agree to such an extension.[13] Any party requesting the extension must report the results of this good faith effort to acquire other parties' agreement when it files its motion for extension of time.[14] If the extension is granted, the party requesting the extension shall notify all other parties to the proceeding of the extension, unless the grant of the extension is by oral ruling delivered on the record of the proceeding.[15]

A review of the service list for this proceeding shows that as of the date of this filing no parties other than PG&E and Cal Advocates have made an appearance or requested party status. As required by Rule 11.6, on November 16, 2026, Cal Advocates has solicited PG&E's agreement to the above extension of time to file its response to the Motion. PG&E supports Cal

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[11] Rules of Practice and Procedure, Rule 11.1(e).

[12] Cal Advocates intends to file its protest to the Application on this same date.

[13] Rule 11.6.

[14] Rule 11.6.

[15] Rule 11.6.

Advocates' request for an extension. PG&E and Cal Advocates have agreed to the following filing deadlines for their respective filings in this proceeding:

Due Date	**Action**
December 7 *(currently due 11/17)*	- Cal Advocates to file its Response to PG&E's Motion. -Cal Advocates to file its protests to the Application.
December 22 *(currently due 12/17)*	-PG&E to file its reply to Cal Advocates' Response and Cal Advocates' protest to Application.

IV. CONCLUSION

Cal Advocates' participation in this proceeding is necessary and appropriate. Cal Advocates' request for sufficient time to submit its response to the Motion is reasonable and unopposed. For the reasons stated above, Cal Advocates respectfully requests the Commission grant an extension to file its response to the Motion to December 7, 2026.

Respectfully submitted,

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