

Attachment A
Draft Rate Case Plan

SUMMARY OF RATE CASE PLAN

Table 1: Risk Assessment and Mitigation Phase (RAMP) Submission and
Phase 1 General Rate Case (GRC) Applications

Date	Days	Event
Test Year minus 3		
May 15	Day 0	Utility files application to initiate its RAMP proceeding ¹
By September 1	~Day 110	Safety and Policy Division (SPD) files and serves report on utility's RAMP submission.
By November 15	~Day 184	Opening comments on RAMP submission and the SPD report
By December 1	~Day 200	Reply Comments
Test Year minus 2		
May 15	Day 0	Utility files GRC application, and serves prepared testimony
By May 30	~Day 15	Utility holds public workshop on overall GRC application
30 days after Daily Calendar notice	~Day 30	Due date for protests and responses to GRC application, pursuant to Rule 2.6(a)
By June 30	~Day 45	Prehearing Conference held
By August 15	~Day 90	Scoping Memo of Assigned Commissioner issued
To be decided		Public Participation Hearings
By December 15	~Day 215	Cal Advocates and other intervenors serve opening testimony
Test Year minus 1		
By January 30	~Day 260	Concurrent rebuttal testimony served
By February 25	~Day 285	Evidentiary hearings begin
By March 15	~Day 305	Evidentiary hearings end
To be decided		Update testimony and hearings, if necessary
By April 20	~Day 340	Briefs filed
By May 12	~Day 360	Reply briefs filed
By August 3	~Day 445	Status conference, proceeding submitted for Commission decision [Rule 13.14(a)]
By November 1	~Day 535	Proposed decision mailed for comment
By December 1	~Day 565	Final decision adopted
Test Year		
January 1	~Day 595	Effective date of final decision

¹ In Rulemaking (R.) 26-04-016, the Order Instituting Rulemaking to Refine the Risk Based Decision Making Framework for Electric and Gas Utilities, the Commission is considering whether to modify the RAMP schedule and process. (See July 20, 2026, Assigned Commissioner's Scoping Memo and Ruling in R.26-04-016 at 3). Any proposed changes to the RAMP schedule and process are deferred to R.26-04-016.

SUMMARY OF RATE CASE PLAN

Table 2: Phase 2 GRC (Rate Design) Applications

Beginning 90 Days After Filing of Phase 1 GRC Application		
Date	Days	Event
By August 15	0	Applicant's complete electric rate design proposal filed
30 days after Daily Calendar notice	~Day 30	Due date for protests and responses to GRC application, pursuant to Rule 2.6(a)
By September 30	~Day 45	Prehearing Conference held
By November 15	~Day 90	Scoping Memo of Assigned Commissioner issued
By November 25	~Day 100	Utility submits updated electric rate design
By January 22	~Day 170	Cal Advocates submit electric rate design exhibits
By March 3	~Day 200	Other intervenors submit electric rate design exhibits
	~Day 221-232	Electric Rate Design evidentiary hearings
By April 11	~Day 239	Electric Rate Design rebuttals submitted
	~Day 249-253	Electric Rate Design rebuttal hearings
By May 13	~Day 271	Opening briefs filed
By May 27	~Day 285	Reply briefs filed
By August 19	~Day 369	Proposed decision mailed for comment

Table 2: Phase 2 GRC (Rate Design) Applications –
Edison Only

Beginning 90 Days After Filing of Phase 1 GRC Application - Edison Only		
Date	Days	Event
By August 15	0	Applicant's complete electric unit marginal costs, marginal cost revenue responsibility, revenue allocation, and rate design application filed and supporting testimony served ("rate design phase")
30 days after Daily Calendar notice	~Day 30	Due date for protests and responses to GRC application, pursuant to Rule 2.6(a)
By September 30	~Day 45	Prehearing Conference held
By November 15	~Day 90	Scoping Memo of Assigned Commissioner issued
By December 23	~Day 130	Utility submits updated electric rate design exhibits
By February 21	~Day 190	Cal Advocates submit electric rate design exhibits
By April 2	~Day 230	Other intervenors submit electric rate design exhibits
	~Day 263-281	Electric Rate Design evidentiary hearings
By June 20	~Day 309	All parties serve electric rate design rebuttals
	~Day 319-330	Electric Rate Design rebuttal hearings
By July 30	~Day 349	Opening briefs filed
By August 13	~Day 363	Reply briefs filed
By November 7	~Day 449	Proposed decision mailed for comment

SUMMARY OF ELECTRIC RATE DESIGN WINDOWS

Day Schedule² RCP

Parties may file proposed electric rate design revisions from July 20 to 25,³ November 20 to 25,⁴ or December 20 to 26⁵ prior to an attrition year with copies served on all other parties

0	July, November or December 26th (see footnote) of Test Year and first Attrition year
30	Comments on proposed rate design revisions to be filed and served on all parties
44	Replies to comments to be submitted and served
58	Administrative Law Judge (ALJ) ruling on the necessity to reopen the GRC for consideration of any or all electric rate design proposals
72	Hearings begin
76	Last day of hearings
83	Concurrent briefs submitted and served
107	ALJ Draft decision filed and served on all parties
127	Initial comments on ALJ Draft filed and served
132	Reply comments on ALJ Draft filed and served
142	Final decision expected by this date

² If Day falls on Saturday, Sunday or holiday, the next working day should be observed.

³ PP&L and SPPC will be in July.

⁴ PG&E and SDG&E will be in November.

⁵ SCE will be in December.

TABLE 1
SUMMARY OF ELECTRIC RATE DESIGN WINDOW SCHEDULES

Day Schedule	Event	PG&E Date	SPPC Date	SCE Date	SDG&E Date	PP&L Date
0	Proposed electric rate design revisions filed.	25-Nov	25-Jul	25-Dec	25-Nov	25-Jul
30	Comments on proposed revisions due.	25-Dec	24-Aug	24-Jan	25-Dec	24-Aug
44	Reply to comments due.	08-Jan	07-Sep	07-Feb	08-Jan	07-Sep
58	ALJ rules on reopening GRC.	22-Jan	21-Sep	21-Feb	22-Jan	21-Sep
72	Hearings begin.	05-Feb	05-Oct	07-Mar	05-Feb	05-Oct
76	Last day of hearings.	09-Feb	09-Oct	11-Mar	09-Feb	09-Oct
83	Concurrent briefs submitted.	16-Feb	16-Oct	18-Mar	16-Feb	16-Oct
107	ALJ draft decision due.	12-Mar	09-Nov	11-Apr	12-Mar	09-Nov
127	Initial comments on draft due.	01-Apr	29-Nov	01-May	01-Apr	29-Nov
132	Reply to comments on ALJ draft due.	06-Apr	04-Dec	06-May	06-Apr	04-Dec
142	Final decision due.	16-Apr	14-Dec	16-May	16-Apr	14-Dec
	Date rates become effective.	01-May	01-Jan	a/	01-May	01-Jan

a/Rates are effective the first Sunday in June

Note: If the above dates fall on Saturday, Sunday, or holiday, the next working day should be observed.

RATE CASE PLAN⁶

RAMP Submission and Phase 1 GRC Applications

Day 0 (Test year minus 3)

1. The utility shall comply with all Commission decisions and orders when submitting their Risk Assessment and Mitigation Phase (RAMP) filings. Data requests and responses to the Commission's Safety Policy Division (SPD) and intervenors shall be completed in a timely and complete fashion.

Day 0 (Test Year minus 2)

1. The application shall be filed and served in conformity with the Rules of Practice and Procedure except that one hard copy of the application and associated testimony shall be served on the Chief ALJ. The utility shall provide notification to customers, within 45 or 75 days as required by Rule 3.2.
2. The application shall include final exhibit, prepared testimony, and other evidence, and shall be served on all parties to the last general rate case. The application, final exhibits, and all other evidence shall incorporate the utility's RAMP submission and any subsequent changes. No bulk or major updating amendments or recorded data to amend the final exhibits, prepared testimony, or other evidence shall be allowed, except as provided on page A-23.
3. Applicant shall file a comparison exhibit showing changes that have occurred between the RAMP submission and risks presented in the GRC filing.
4. Applicant shall deliver five complete sets of the application and final exhibits plus two complete sets of the workpapers supporting the application and final exhibits to the Cal Advocates Project Manager.
5. Unless instructed otherwise, Applicant, staff, and interested parties shall send two hard copies of all exhibits, prepared testimony, and other evidence served after Day 0 to the ALJ. One copy shall be served on the

Reporting Branch. Service of testimony and exhibits on parties shall be

⁶ Page A-16 contains a list of the energy utilities to which the RCP applies.

consistent with the requirements of the Rules of Practice and Procedure. Prepared testimony should not be filed in the Docket Office after Day 0; only briefs, comments on the ALJ proposed decision, and other pleadings are to be filed.

Day 2 - 30

The ALJ(s), in concurrence with the assigned Commissioner, shall set the day, time, and place for the prehearing conference. At the appropriate time, the utility shall give notice of the Public Participation Hearings, pursuant to Rule 13.1, using the format shown on page A-24.

Day 15

Applicant holds public workshop on overall GRC application.

Day 45

A prehearing conference is held:

1. To take appearances.
2. To raise and resolve any procedural matters.
3. To schedule hearings and specify areas of participation if known, and specify dates for testimony if necessary to expedite the hearing procedure.

Day 90

Scoping Memo and Ruling of assigned Commissioner issued.

TBD

Public participation hearings will be held during this period. They may be held concurrently with evidentiary hearings if necessary to complete the hearings according to this plan.

Day 215

Cal Advocates and other intervenors serve opening testimony.

Day 260

Concurrent rebuttal testimony served. Rebuttal evidence shall refute the evidence of other parties and shall not reassert or reargue a party's direct evidence. No bulk or major updating amendments or recorded data shall be allowed in rebuttal evidence. Additional witnesses, cumulative testimony, and unproductive cross-examination

shall be minimized. Rebuttal evidence shall clearly reference by number the exhibit or transcript page of the direct evidence of the party rebutted.

Day 285 - 305

Evidentiary hearings begin.

1. Hearings shall ordinarily be held not less than 15 days a month. Unless otherwise specified by the assigned ALJ(s), applicant shall be responsible for providing an updated cross-examination schedule and exhibit list during hearings.
2. Where an agreement between applicant and staff is disputed by other parties, those parties shall have the right to cross-examine applicant and staff in that order. The examination will be closely controlled to prevent an undue consumption of time.

TBD

Update testimony and hearings, as necessary. Update testimony shall be limited to the issues included on page A-23.

Day 340

Opening briefs filed. The assigned ALJ(s) may outline specific issues to be briefed. Briefing of additional issues is optional. Deadline to request oral argument (per Rule 13.14).

Day 360

Reply Briefs may be filed. Date proceeding is submitted, unless oral argument is held.

Phase 2 GRC Applications (90 Days after filing of Phase 1 GRC application)

Day 0

Applicant shall file a complete electric rate design proposal and serve supporting exhibits and testimony. No bulk or major updating amendments or recorded data to amend the exhibits or prepared testimony shall be allowed thereafter, except as provided on page A-23.

Day 30

Due date for protests and responses to GRC application, pursuant to Rule 2.6(a).

Day 2 - 30

The ALJ(s), in concurrence with the assigned Commissioner, shall set the day, time, and place for the prehearing conference. At the appropriate time, the utility shall give notice of the Public Participation Hearings, pursuant to Rule 13.1, using the format shown on page A-24.

Day 45

A prehearing conference is held:

4. To take appearances.
5. To raise and resolve any procedural matters.
6. To schedule hearings and specify areas of participation if known, and specify dates for testimony if necessary to expedite the hearing procedure.

Day 90

Scoping Memo and Ruling of assigned Commissioner issued.

Day 100

Applicant may submit updated electric rate design exhibits.

Day 170

Cal Advocates serves prepared testimony.

Day 200

Intervenors serve prepared testimony.

Days 221-232

Evidentiary hearings.

Day 239

Electric rate design rebuttal exhibits shall be distributed by this day.

Days 249-253

Electric rate design rebuttal hearings

Day 271

Electric rate design phase opening briefs filed and served. The ALJ may outline specific rate design issues to be briefed. Briefing of additional electric rate design issues is optional. Last date to request oral argument (per Rule 13.14).

Day 285

Reply briefs may be filed and served. Proceeding submitted, unless oral argument is held.

Phase 2 GRC Applications (90 Days after filing of Phase 1 GRC application – Edison Only)

Day 0

Applicant shall file a complete electric rate design proposal and serve supporting exhibits and testimony. No bulk or major updating amendments or recorded data to amend the exhibits or prepared testimony shall be allowed thereafter, except as provided on page A-23.

Day 30

Due date for protests and responses to GRC application, pursuant to Rule 2.6.

Day 2 - 30

The ALJ(s), in concurrence with the assigned Commissioner, shall set the day, time, and place for the prehearing conference. At the appropriate time, the utility shall give notice of the Public Participation Hearings, pursuant to Rule 13.1, using the format shown on page A-24.

Day 45

A prehearing conference is held:

7. To take appearances.
8. To raise and resolve any procedural matters.
9. To schedule hearings and specify areas of participation if known, and specify dates for testimony if necessary to expedite the hearing procedure.

Day 90

Scoping Memo and Ruling of assigned Commissioner issued.

Day 130 -

Applicant may submit updated electric rate design exhibits.

Day 190

Cal Advocates serves prepared testimony.

Day 230

Intervenors serve prepared testimony.

Days 263-281

Evidentiary hearings.

Day 309

Electric rate design rebuttal exhibits shall be distributed by this day.

Days 319-330

Electric rate design rebuttal hearings

Day 349

Electric rate design phase opening briefs filed and served. The ALJ may outline specific rate design issues to be briefed. Briefing of additional electric rate design issues is optional. Last date to request oral argument (per Rule 13.14).

Day 363

Reply briefs may be filed and served. Proceeding submitted, unless oral argument is held.

ELECTRIC RATE DESIGN WINDOWS⁷

Day 0

Any party to the last general rate case may propose revisions to the adopted rate designs from July 20th to 25th,⁸ November 20th to 25th,⁹ or December 20th to 26th¹⁰ prior to an attrition year.

All proposals must be complete and include:

1. The proposed revisions
2. Full justification for the revisions
3. An explanation why the revision should be considered prior to the next general rate case
4. A reconciliation with the latest adopted revenue requirement and class allocations

The application shall be filed and served in conformity with the Rules of Practice and Procedure except that two hard copies of the application and associated testimony shall be served on the Chief ALJ. Workpapers shall be delivered by Day 0 to Cal Advocates and utility project managers and any other party requesting them (*see* pages A-17 through A-22).

Day 30

Any party served may comment on the proposals within 30 days. The comments shall be limited to responding to the filings and shall not raise new proposals. Such comments shall be filed and served on all parties.

Day 44

Reply comments may be filed and served on all parties within 14 days.

Day 58

The ALJ who heard the rate design proposals in the general rate case (or other ALJ as the Commission may assign) shall rule by Day 58 on the necessity to re-open the GRC for consideration of any or all rate design proposals.

⁷ If Day falls on Saturday, Sunday or holiday, the next working day should be observed.

⁸ PP&L and SPPC will be in July.

⁹ PG&E and SDG&E will be in November.

¹⁰ SCE will be in December.

Day 72

Hearings begin on re-opened rate design issues. No more than five days will be allowed.

Day 76

Last day of hearings.

Day 83

Concurrent briefs may be submitted.

Day 107

ALJ Draft decision filed and served on all parties.

Day 127

Initial comments on ALJ Draft filed and served.

Day 132

Reply comments on ALJ Draft filed and served.

Day 142

Final decision expected by this date with rates to become effective twelve months after the effective date of the last rate design revisions.

LIST OF APPLICABLE ENERGY UTILITIES

1. Pacific Gas and Electric Company
2. San Diego Gas & Electric Company
3. Southern California Edison Company
4. Southern California Gas Company

The smaller energy utilities listed below shall also file general rate applications every three years beginning with the test year noted after their name.

1. Southwest Gas Company (TY 1989)
2. Sierra Pacific Power Company (TY 1990)
3. Pacific Power and Light Company (TY 1991)

Smaller energy utility rate applications are processed on an expedited basis generally being closed within a year from filing, assuming a complete initial application and adequate Commission staffing.

STANDARD REQUIREMENT LIST OF
DOCUMENTATION SUPPORTING GRC FILINGS

1. Brief statement of amount, reason for, and summary supporting the increase.
2. When Cost of Capital issues are consolidated into a generic case for all utilities, and are not part of the general rate case, the utility shall use the most recently authorized rate of return in its GRC calculations. For the application the utility may include exhibits and testimony requesting a different cost of capital. However, the application must use the currently authorized cost of capital as a base case. This testimony may be updated and re-submitted at the appropriate filing time for the generic cost of capital case.
3. Revenues at present rates in the Results of Operations report shall include a base case derived directly from authorized tariffs in effect on or after two months prior to filing the application. The utility shall update the results of operations exhibit by service of its update testimony to incorporate any and all tariff changes which became effective following the filing of the application.
4. Draft exhibits and prepared testimony (similar to those presented in final application form) shall include the elements required under Rule 3.2, and other Rule provisions are not applicable.
5. Complete explanation of exhibits and special studies furnished.
6. Workpapers showing calculations and documentation to support the utility's draft exhibits and special studies. Workpapers must comply with all the following:
 - A. Be arranged in an orderly sequence and be dated and initialed by the preparer. Where appropriate, each expense item should be broken down into labor, non-labor, and other.
 - B. Show the derivation of each individual estimate.
 1. List all the assumptions necessary for the derivation of each individual estimate and explain the rationale why the

assumptions were used.

2. Show how each assumption was used in each estimate.

3. Where judgment is involved in setting an estimate level, explain why that particular level was adopted.
 4. Furnish base year historical and estimated data and subsequent years with evaluation of changes up to and including the test year.
 5. If there was no precise basis for certain estimates and the derivation was purely subjective, the workpapers should so state.
 6. State management's review criteria including the factors considered by the utility's management in approving various expenditures levels.
 7. Supporting material must have a clear tieback to base data from the stated expenditure.
 8. Justification for the methodology used to develop each estimate shall be included.
- C. Be appropriately indexed and legible.
- D. Computer printouts must be accompanied by a detailed description of the program. The recorded data used should be identified, the various assumptions of variables used should be clearly stated, and any adopted Commission rules governing computer models adhered to.
- E. Show the development of all adjustments, including those associated with affiliates. If an adjustment is based on a Commission ruling, reference the Decision and provide a copy of the relevant portion of the ruling.
- F. Include at least five years of recorded data for each Federal Energy Regulatory (FERC) account used in the development of the test year revenues and revenue requirement. Where subaccounts and/or other than FERC accounts are used to develop test year values, include at least five years of recorded data supporting those values also. All data for expenses shall be stated in recorded dollars and

dollars inflation adjusted to a constant base year. The format shall be mutually agreed to by the utility and Cal Advocates project

managers.

7. In addition to the requirements of 4 above, the following draft exhibits shall be submitted:
 - A. All studies and information required to be submitted in the rate case by the Commission in prior rate decisions and subsequent policy statements or decisions.
 - B. Recorded data, in results of operations format, shall be provided for at least the latest recorded year available at the time of tendering the application. If the application contains material previously litigated but not allowed by the Commission it shall be clearly identified.
 - C. When estimates are made by account or subaccount, those estimated amounts shall be included in the direct showing.
 - D. When controlling affiliates provide guidelines or directions to the company's presentation, these shall be set forth in the direct showing or available in the workpapers.
 - E. FOR ELECTRIC UTILITIES:
 1. Cost allocation studies by classes of service.
 2. Marginal cost data in sufficient detail to allow the development of rates for each customer class.
 3. Demand Side Management cost effectiveness as identified in the Standard Practice Manual for Economic Evaluation of Demand Side Management Programs and consistent with the DSM reporting requirements manual. This shall include a full description, funding requirements, load impacts, and cost effectiveness of each program.
 4. The Utility's current Resource Plan.
 5. Each Phase 2 GRC application shall include the full amount of the requested revenue change, marginal costs, proposed class revenue allocations; and a simplified proposal for

implementing the revenue change.

- a. Alternative rate designs, as necessary, based on current

Commission policies.

- b. Detailed customer bill frequency data compatible with the Commission's computer should be provided with the workpapers for the latest available recorded year. All billing determinants for each tariff schedule must be included. Adequate documentation should be provided to allow Commission staff to develop alternative rate designs.

F. FOR GAS UTILITIES:

1. Demand Side Management cost effectiveness as identified in the Standard Practice Manual for Economic Evaluation of Demand Side Management Programs and consistent with the DSM reporting requirements manual. This shall include a full description, funding requirements, load impacts, and cost effectiveness of each program.
2. At the present time gas utilities marginal cost and rate design are litigated in the Annual Cost Allocation Proceeding (ACAP) per OII 86-06-005. Therefore, marginal cost data, alternative rate designs, and alternate fuel use will not be required exhibits in the general rate case filing unless the Commission moves the issues back into the general rate case. However, utilities should submit a proposed rate design to reflect the revenue requirement changes in its application.

STANDARD REQUIREMENT LIST OF DOCUMENTATION SUPPORTING
STAFF AND OTHER PARTIES EXHIBITS AND TESTIMONY

1. Complete explanation of exhibits and special studies submitted. If the exhibits contain material previously litigated but not allowed by the Commission, it shall be clearly identified.
2. Workpapers showing calculations and documentation to support the exhibit. Workpapers must:
 - A. Be arranged in an orderly sequence and be dated and initialed by the preparer. When appropriate, each expense item should be broken down into non-labor, labor, and other.
 - B. Be appropriately indexed and legible.
 - C. Computer output must be accompanied by description of the program. The input data used should be identified and the various assumptions of variables used should be clearly stated.
 - D. Show the derivation of each individual estimate.
 1. List all the assumptions necessary for the derivation of each individual estimate and explain the rationale why the assumptions were used.
 2. Show how each assumption was used in each estimate.
 3. Where judgment is involved in establishing an estimate level, explain why that particular level was recommended.
 4. Furnish or provide reference to base year historical and estimated data and subsequent years with evaluation of changes up to and including the test year.
 5. If there was no precise basis for certain estimates and the derivation was purely subjective, the workpapers should so state.

6. Supporting material must have a clear tieback to base data from the stated expenditure.

3. A complete set of workpapers shall be delivered to Cal Advocates and any other party requesting them, on the appropriate day noted in the Rate Case Plan.

STANDARD UPDATE EXHIBIT
FILING REQUIREMENTS LIST

1. Other than electric rate design:

Any update testimony or exhibits filed by applicant, staff, or interested party shall be limited to:

- A. Known changes in cost of labor based on contract negotiations or known changes that result from updated data using the same indexes used in the original presentation during hearings.
- B. Changes in non-labor escalation factors based on the same indexes the party used in its original presentation during hearings.
- C. Known changes due to governmental action such as changes in tax rates, postage rates, or assessed valuation.

The update exhibit may include decreases as well as increases in the above categories. All testimony and exhibits for updating shall be in fully prepared form and served on all appearances as indicated in the rate case plan.

2. Electric Rate Design:

Applicant may update electric rate design testimony or exhibits. Any testimony and exhibits for updating shall be in fully prepared form and served on all appearances as indicated in the rate case plan.

(SAMPLE)
NOTICE¹¹

The California Public Utilities Commission will hold public comment hearings as listed below on the request of (utility) to increase its rates by \$____per year. If the entire amount is approved by the Commission, the impact on customers will be as follows:

(Brief description of which rates the utility proposes to raise or lower and the \$ and % amount. The effect on the average residential customer's monthly bill shall be shown. The effect on rates of all customer classes shall be shown. A statement of the reasons for the rate increase shall also be included.)

The hearing dates listed below give you an opportunity to express your views to the Commission. You may submit written comments or make a brief oral statement at the hearing.

DATES AND LOCATIONS OF PUBLIC COMMENT
HEARINGS IN APPLICATION _____BEFORE
THE CALIFORNIA PUBLIC UTILITIES
COMMISSION.

(List dates, locations, and times of specifically
designated public comment hearings.)

The Commission welcomes your comments. If you cannot attend these hearings, you may submit written comments to the Commission at one of the addresses listed below. Simply state that you are writing about Application ____ of (utility).

A copy of (utility's) application may be inspected in its local business office or at its headquarters.

¹¹ This notice is provided as a sample format. All notices must be submitted to the Commission's Public Advisor's Office for review prior to publishing.