

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED
03/24/21
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Application of Pacific Gas and Electric Company for
Authority, Among Other Things, to Increase Rates and
Charges for Electric and Gas Service Effective on
January 1, 2020. (U 39 M)

Application 18-12-009
(Filed December 13, 2018)

**MOTION OF THE UTILITY REFORM NETWORK TO SHORTEN TIME FOR
RESPONSES TO PETITION FOR MODIFICATION OF DECISION 20-12-005
TO REQUIRE PACIFIC GAS AND ELECTRIC COMPANY TO PRESENT
AN INFLATION-CONSTRAINED ALTERNATIVE PROPOSAL
IN ITS UPCOMING GENERAL RATE CASE**



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March 24, 2021

**MOTION OF THE UTILITY REFORM NETWORK TO SHORTEN TIME FOR
RESPONSES TO PETITION OF MODIFICATION OF DECISION 20-12-005 TO
REQUIRE PACIFIC GAS AND ELECTRIC COMPANY TO PRESENT
AN INFLATION-CONSTRAINED ALTERNATIVE PROPOSAL
IN ITS UPCOMING GENERAL RATE CASE**

Pursuant to Rule 11.1 of the Commission's Rules of Practice and Procedure (Rule), The Utility Reform Network (TURN) submits this Motion to Shorten Time for Responses to TURN's Petition for Modification of Decision 20-12-005 to Require Pacific Gas and Electric Company (PG&E) to Present an Inflation-Constrained Alternative Proposal in its Upcoming General Rate Case (GRC). TURN requests a Ruling directing that the time for responses to TURN's accompanying Petition for Modification (Petition) of Decision (D.) 20-12-005 be shortened from 30 to 15 days.

Expediting the resolution of this Petition is in the public interest. The Petition seeks an Order requiring Pacific Gas and Electric Company (PG&E) to supplement its upcoming General Rate Case (GRC) proposal with an alternative proposal that limits the growth in spending by the rate of inflation. As explained in the Petition, this alternative proposal will provide important information to improve the decision-making record for the GRC. Because the Petition seeks to add a new requirement to PG&E's upcoming GRC presentation, the resolution of the Petition should be expedited to allow PG&E as much time as possible to comply with the new requirement.

Shortening the time for responses to this Petition will not prejudice PG&E or any other party. On the same day TURN is filing the Petition, TURN is also filing a Motion to Require PG&E to Present an Inflation-Constrained Alternative Proposal in its Upcoming GRC in A.20-06-012, PG&E's open Risk Assessment and Mitigation Phase (RAMP) proceeding. That Motion

seeks virtually the same relief as is requested in the Petition.¹ Pursuant to Rule 11.1, responses to the A.20-06-012 Motion must be filed within 15 days of the filing of that Motion.

Accordingly, by this pleading, TURN is requesting that the Commission direct that any responses to the accompanying Petition be filed on the same date as responses to the Motion in A.20-06-012. Because the A.20-06-012 Motion and the Petition request virtually identical relief, the substantive responses to those pleadings should likewise be virtually identical.

In sum, shortening time for responses to the accompanying Petition will expedite resolution of the Petition -- if the Commission decides that the Petition is the appropriate vehicle to address TURN's requested relief -- without prejudicing any party.

For the foregoing reasons, TURN requests that the time for responses to the accompanying Petition be shortened from 30 to 15 days.

Dated: March 24, 2021

Respectfully submitted,

By: /s/
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¹ As TURN explains both in that A.20-06-012 Motion and in the accompanying Petition, TURN's strong preference is that the merits of TURN's requested relief be addressed by the more expeditious vehicle of a Ruling of an administrative law judge (ALJ) or assigned commissioner, as opposed to a Commission decision on a petition for modification. TURN is simultaneously submitting the Petition as a protective pleading, in the event the Commission determines that TURN's Motion is not appropriate for resolution in A.20-06-012.