September 2, 2026

Via Electronic Filing

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Request for Order to Show Cause Regarding PG&E's Public Announcement of Planned Deferral of CPUC-Authorized Capital Investments

Dear President Reynolds and Commissioners:

I respectfully request that the California Public Utilities Commission issue an **Order to Show Cause** requiring Pacific Gas and Electric Company ("PG&E") to explain whether its recently announced plan to defer approximately $2 billion in capital investments is consistent with the Commission's General Rate Case decisions, interim rate relief decisions, and other Commission orders authorizing recovery of those investments from ratepayers.

Ratepayers are paying for these investments with a generous return on investment. PG&E needs to make these investments or give the ratepayers their money back.

According to PG&E's September 2, 2026 public announcement, the company intends to defer investments that include:

- Electric infrastructure upgrades;
- Gas infrastructure upgrades;
- Connections for new customers; and
- Connections for new power plants to the electric grid.

The company also stated that these deferrals are intended to preserve financial flexibility in light of uncertainty surrounding potential wildfire legislation.

These statements raise serious regulatory concerns. PG&E appears to be engaged in a "capital strike," where it withholds paid-for-services in exchange for a political result.

The Commission has approved billions of dollars in capital expenditures through General Rate Case proceedings and has granted interim rate relief based upon findings that these investments are reasonable, necessary, and in the public interest. Ratepayers are paying rates today based upon the expectation that the authorized work will be performed.

If PG&E is collecting revenues authorized by the Commission while simultaneously electing not to perform material portions of the work underlying those authorized revenues, the Commission should determine whether such conduct is consistent with:

- The Commission's General Rate Case decision;
- Any applicable interim rate decision;
- Public Utilities Code Sections 451 and 701;
- The utility's obligation to provide safe and reliable service; and
- The representations PG&E made to the Commission in obtaining approval of these expenditures.

Accordingly, I respectfully request that the Commission order PG&E to show cause and require the company to identify within 48 hours:

1. Every project proposed for deferral and its estimated dollar amount;
2. The Commission decision, application, or proceeding authorizing recovery for each project;
3. Whether ratepayers are currently paying for those investments through existing rates;
4. The legal basis for delaying Commission-authorized investments while continuing to collect authorized revenues;
5. The expected impacts on customer reliability, safety, housing development, and interconnection of new generation;
6. Whether the announced deferrals are intended to influence pending legislative or regulatory proceedings; and
7. Whether refunds, balancing account adjustments, or other ratepayer protections will be implemented if authorized work is not completed as represented.

The Commission should also determine whether any authorized revenue requirement should be adjusted if PG&E elects not to make investments upon which those rates were based.

Ratepayers should not be placed in the position of paying today for infrastructure that a utility later chooses not to construct. If PG&E believes changed circumstances justify modification of Commission-approved investment plans, the appropriate course is to petition the Commission for relief rather than unilaterally announcing delays while continuing to collect rates established under existing Commission decisions.

An Order to Show Cause would allow the Commission to establish a complete evidentiary record and determine whether PG&E's announced actions are consistent with its regulatory obligations and the Commission's prior orders.

Thank you for your consideration of this request.

Respectfully submitted,

Jamie Court

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President, Consumer Watchdog