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October 5, 2023

Shannon O'Rourke
Deputy Director, Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety
Via OEIS E-Filing and email: safetypolicy@energysafety.ca.gov

Re: Request for Extension to Respond to PG&E 2023-2025 WMP Supplemental Response to the Revision Notice

Dear Ms. O'Rourke,

The Utility Reform Network (TURN) respectfully requests a four-day extension, to October 13, 2023,¹ to respond to PG&E's Supplemental Revision Notice Response (PG&E's Supplemental Response), which was submitted on September 27, 2023. The extension is needed to allow more time to review and address the substantial amount of information provided in PG&E's Supplemental Response and because of the concurrent competing demands of a related proceeding at the CPUC, PG&E's General Rate Case (GRC), A.21-06-021. The CPUC's Public Advocates Office (Cal Advocates) and the Mussey Grade Road Alliance (MGRA) join in this request.

PG&E's Supplemental Response presents a significant amount of new information to review and analyze. It addresses five different critical issues identified by Energy Safety and comprises: a 146-PDF page Supplemental Response, much of which consists of new or modified information; three new and complex multi-tab Excel attachments, including a new Economic Analysis Software Package (EASOP) model and a new "Mitigation Alternatives Analysis for 2023 and 2024." The current October 9, 2023 deadline does not allow sufficient time to analyze this significant volume of new information and to prepare an adequate response.

In addition, the same individuals who are responsible for preparing comments on PG&E's Supplemental Response have needed to focus much of their time and resources on a related matter, PG&E's pending GRC at the CPUC, in which a lengthy Proposed Decision and Alternate Proposed Decision were issued on September 13, 2023. TURN, Cal Advocates and MGRA submitted extensive comments on those proposed decisions on October 3, 2023 and reply comments are due on October 9, 2023. Analyzing and preparing comments on those proposed decisions is consuming a large amount of intervenor resources that have therefore not been available to review PG&E's Supplemental Response.

¹ Pursuant to your September 13, 2023 letter to PG&E regarding PG&E's request to submit a supplemental response, comments on PG&E's Supplemental Response are currently due on October 9, 2023.

For these reasons, TURN, Cal Advocates and MGRA request an extension to October 13, 2023 for opening comments on PG&E's Supplemental Response, with a commensurate extension for reply comments to October 20, 2023.

Sincerely,

/s/ Thomas J. Long

Thomas J. Long
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