

**PACIFIC GAS AND ELECTRIC COMPANY**  
**PG&E Ref. DRU16306-Case-EUP-SB 884**  
**Data Request CPUC Safety Policy Division**  
**Requester DR No. EUP Timeline (SPD-PGE-SB884-020)**

**Requester: Emrani, Amin; Hanes, Fred**  
**Request Date: August 28, 2025**  
**Response Date: September 03, 2025**

**Question No. 001:**

For PG&E, what is the expected timing for submitting an EUP to the Energy Safety?

**Response to Question No. 001 Response No. 001:**

At this time, PG&E does not have definitive timing for submitting an EUP. Following the CPUC's issuance of Draft Resolution SPD-37, PG&E is evaluating whether it is feasible to submit an EUP to Energy Safety and/or cost recovery Application to the CPUC.

If SPD-37 is not significantly revised, primarily to revert to the original requirements of SPD-15, it is unlikely that PG&E will submit a 10-Year Undergrounding Plan pursuant to SB 884. PG&E will provide opening comments on SPD-37 on September 4, 2025 outlining the implications of the Draft Resolution as written, including proposed revisions, ahead of the CPUC voting meeting scheduled for September 18, 2025. The outcome of Draft Resolution SPD-37 will inform PG&E's next steps regarding a potential EUP filing, including the timing to submit an EUP to Energy Safety.

**Question No. 002:**

What is the expected timing for submitting an EUP cost recovery Application to the Commission?

**Response to Question No. 002 Response No. 001:**

Please see the response to Question 001. The outcome of Draft Resolution SPD-37 will impact when or whether PG&E submits an EUP to Energy Safety. If PG&E does submit an EUP to Energy Safety and it is approved, the EUP cost recovery Application would be submitted in accordance with the established statutory and regulatory guidelines (i.e., the Phase 2 Cost Application is filed within two months after Energy Safety Phase 1 approval of the EUP).