PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298

Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 7945E
As of August 20, 2026

Subject: Request to Continue PG&E's Wildfire Liability Self-Insurance Program Into the 2027 General Rate Case (GRC) Cycle, Until Issuance of a Final Decision in the 2027 GRC (A.25-05-009)

Division Assigned: Energy

Date Filed: 07-14-2026

Date to Calendar: 07-17-2026

Authorizing Documents: D2301005

Disposition:	**Accepted**
Effective Date:	**08-13-2026**

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Michael Finnerty
(279) 789-6216
PGETariffs@pge.com

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298

To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

Advice Letter Number
Name of Filer
CPUC Corporate ID number of Filer
Subject of Filing
Date Filed
Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
Effective Date of Filing
Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

Pacific Gas and Electric Company

Nika Kjensli
Chief
Regulatory Relations

Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, CA 94612

July 14, 2026

Advice 7945-E
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: **Request to Continue PG&E's Wildfire Liability Self-Insurance Program Into the 2027 General Rate Case (GRC) Cycle, Until Issuance of a Final Decision in the 2027 GRC (A.25-05-009)**

1. Purpose

Pursuant to Decision (D.) 23-01-005, Ordering Paragraph 2(d), and with the support of The Utility Reform Network (TURN) and the California Public Advocates at the California Public Utilities Commission (Cal Advocates), Pacific Gas and Electric Company (PG&E) submits this Tier 2 Advice Letter requesting Commission approval to continue operation of PG&E's Wildfire Liability Self-Insurance program into the beginning of the PG&E's 2027 GRC cycle. Approving this request would authorize the Wildfire Self-Insurance program to continue operating under the terms and conditions approved in D.23-01-005, until a final decision is issued in PG&E's pending 2027 GRC proceeding. If approved, the Wildfire Self-Insurance program will continue under the terms and conditions in that final decision.

During PG&E's 2023 GRC cycle, TURN, Cal Advocates, and PG&E entered into a Settlement Agreement to establish the Wildfire Liability Self-Insurance program.[1] The Commission approved the settlement in D.23-01-005, *Decision Approving Settlement Regarding Wildfire Liability Insurance Coverage*, authorizing the program through the 2023 GRC period, ending December 31, 2026. D.23-01-005, OP 2d states, in relevant part:

> The term of this Settlement is for the 2023 GRC period and may be extended into the 2027 GRC as set forth in Section 3.3.2 of the Settlement in a Tier 2 advice letter.[2]

PG&E's pending 2027 GRC proceeding (A. 25-05-009) is not anticipated to issue a final decision by December 31, 2026. Per the current scoping ruling, a final decision is not anticipated until May 2027.

---

[1] Pursuant to the Commission's Rules of Practice and Procedure, Rule 1.8(d), TURN and Cal Advocates, as settling parties, agree to the submittal of this advice letter.

[2] D.23-01-005, OP 2d, p.24.

2. Wildfire Self-Insurance Background

A. PG&E's Wildfire Liability Self-Insurance Program was Established in 2023

On June 30, 2021, PG&E filed its 2023 GRC Application requesting the Commission authorize its 2023 GRC revenue requirements for the period 2023-2026 (the 2023 GRC Period).

On October 7, 2022, PG&E, TURN, and Cal Advocates moved for approval of a Settlement establishing structure and funding of liability insurance for third-party wildfire claims. The Settlement provided a framework for the transition to 100 percent self-insurance for Wildfire Liability insurance coverage for the 2023 GRC Period. On January 17, 2023, the CPUC issued D.23-01-005 approving the Settlement. The Settlement includes the three terms as relevant to the instant request:

> The Settling Parties agree that for the 2023 GRC Period, PG&E will not purchase wildfire Liability insurance from the commercial insurance market except as described…. PG&E will self-insure its wildfire liability risk as described in this Settlement. For the 2023 GRC Period, PG&E's, wildfire liability insurance program will consist of (i) the remaining wildfire liability insurance coverage currently in place through existing commercial market policies, which will expire in 2023 and (ii) additional self-insurance as provided in this Settlement. (Settlement Agreement, Section 3.1).[3]
>
> …
>
> The term of this Settlement is for the 2023 GRC Period and may be extended into 2027 … Additionally for reasons not limited to those described in Section 3.3.2, upon mutual agreement of the Settling Parties, the Settling Parties may seek Commission authorization to extend the term of this Settlement for one or more years via Tier 2 Advice Letter…." (Section 3.9).
>
> …
>
> Unless otherwise expressly stated, the obligations set forth in this Settlement shall take effect upon the Commission's approval of this Settlement and shall be limited to the term of the 2023 GRC except as otherwise described in this Settlement.…." (Section 4.14).[4]

[3] D.23-01-005, Appendix 1.

[4] Settlement, Article 2.9, states that "2023 GRC Period" means the period between January 1, 2023 and December 31, 2026 for which rates will be in effect in accordance with the Commission's final decision in this proceeding.

B. PG&E, TURN, and Cal Advocates Agree Continuation of the Self-Insurance Program is Warranted

On February 27, 2026, in accordance with D.23-01-005, OP 2d, the Settling Parties (PG&E, TURN and Cal Advocates) met to assess the operation of PG&E's Wildfire Liability Self-insurance program through the first three years of the program. All parties agreed that PG&E's Wildfire Self-Insurance program should continue to operate without modification until a final decision is issued in PG&E's 2027 GRC proceeding.

C. PG&E's 2027 GRC Proceeding is Pending, and a Final Decision is not Anticipated by December 31, 2026

PG&E's 2027 GRC (A.25-05-009) was filed May 15, 2025, and hearings were completed from April 27 through May 15, 2026. The current schedule does not anticipate a final decision to be issued by December 31, 2026. A proposed decision is scheduled to be issued in March 2027, with a final decision by May 2027.[5]

D. PG&E's Self Insurance Program has Benefitted Customers

PG&E estimates customer savings of approximately $1.8 Billion from the transition to Wildfire Liability self-insurance. This is in addition to a fund balance of approximately $1.036 billion (as of December 31, 2025) that is available for payment of future claim costs and operational expenses in connection with the continued administration of the self-insurance program.

PG&E's Wildfire Liability program protects against liability claims that may be filed alleging bodily injury or property damage monetary loss in connection with a wildfire attributed to PG&E's business operations. PG&E's 2023 GRC Application requested approval of $707 million annually for the purchase of $900 million in traditional insurance through the commercial markets. PG&E began moving towards 100 percent Wildfire Liability self-insurance in March 2023 following approval of the Settlement and has been operating under a 100 percent self-insurance framework since August 2023. Beginning January 1, 2025, PG&E reduced the revenue requirement for CPUC jurisdictional customers to $0. Additionally, PG&E does not request a revenue requirement in the 2027 GRC due to the operational performance of self-insurance.

PG&E submitted annual Advice Letters[6] to provide financial and regulatory accounting information for operation of Wildfire Liability self-insurance , including the following: (i) calculates the revenue requirement to be included in rates for the current year, (ii) shows the Risk Transfer Balancing Accounts self-insurance activity from the prior year, (iii) an update on OP 3 of D.23-01-005 regarding

---

[5] Assigned Commissioner's Scoping Memo and Ruling, A.25-05-009, p. 19 (July 31, 2025) https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M574/K980/574980341.PDF.

[6] D.23-01-005, OP 2.

recovery of self-insurance funding from transmission customers and (iiii) provide an update on the operation of PG&E's self-insurance fund.[7]

3. Request

The Wildfire Liability Self-insurance program is successful to date and should be permitted to continue on the terms and conditions authorized for the 2023 GRC cycle until a final decision in PG&E's 2027 GRC is issued. PG&E, with agreement from TURN and Cal Advocates, seek an interim outcome to continue operating self-insurance to cover PG&E's wildfire liability risk insurance until the 2027 GRC final decision is issued. This authorization is requested by September 30, 2026, to provide PG&E certainty on the status and continued administration of the program in advance of the end of the 2023 GRC period on December 31, 2026.

The outcome sought in this request is limited in time. For the reasons detailed in the Background section above, PG&E seeks authority to maintain its Wildfire Liability Self-Insurance program under the existing terms and conditions approved during the 2023 GRC cycle, until a final decision is issued in the 2027 GRC. This self-insurance program will then continue, if approved, under the terms and conditions in that final decision. This approach ensures continuity for customers throughout the transition between GRC cycles. This Advice Letter does not seek to litigate any of the issues that are pending in that GRC proceeding.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than **August 3, 2026**, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to PG&E via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

Nika Kjensli
Chief, Regulatory Relations
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name and e-mail address of the protestant; and

[7] See Advice 7231-E, 7556-E, and 7880-E.

statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.2, and OP 2, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice letter become effective on or before **August 13, 2026.**

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list and the parties on the service list for A.21-06-021 and A.25-05-009. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: http://www.pge.com/tariffs/.

/S/

Nika Kjensli
Chief, Regulatory Relations
CPUC Communications

cc: Service List A.21-06-021, A.25-05-009

California Public Utilities Commission

ADVICE LETTER SUMMARY

ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (U 39 E)

Utility type:
[x] ELC [ ] GAS [ ] WATER
[ ] PLC [ ] HEAT

Contact Person: Michael Finnerty
Phone #: (279) 789-6216
E-mail: PGETariffs@pge.com
E-mail Disposition Notice to: michael.finnerty@pge.com

EXPLANATION OF UTILITY TYPE
ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 7945-E   Tier Designation: 2

Subject of AL: Request to Continue PG&E's Wildfire Liability Self-Insurance Program Into the 2027 General Rate Case (GRC) Cycle, Until Issuance of a Final Decision in the 2027 GRC (A.25-05-009)

Keywords (choose from CPUC listing): Compliance, GRC/General Rate Case

AL Type: [ ] Monthly [ ] Quarterly [ ] Annual [x] One-Time [ ] Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:
D.23-01-005

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? [ ] Yes [x] No

If yes, specification of confidential information:
Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? [ ] Yes [x] No

Requested effective date: 8/13/26   No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed[1]: N/A

Pending advice letters that revise the same tariff sheets: N/A

[1]Discuss in AL if more space is needed.

Clear Form

Protests and correspondence regarding this AL are to be sent via email and are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Nika Kiensli
Title: Chief, Regulatory Relations
Utility/Entity Name: Pacific Gas and Electric Company

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: PGETariffs@pge.com

Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Clear Form

PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV

AT&T

Albion Power Company
Alta Power Group, LLC

Anderson & Poole
BART

Ava Community Energy

BART
Buchalter
Barkovich & Yap, Inc.
Biering & Brown LLP
Braun Blaising Smith Wynne, P.C.

California Community Choice Association
California Cotton Ginners & Growers Association
California Energy Commission
California Hub for Energy Efficiency
California Alternative Energy and Advanced Transportation Financing Authority
California Strategies

California Public Utilities Commission
Calpine
Cameron-Daniel, P.C.
Casner, Steve
Center for Biological Diversity
Chevron Pipeline and Power

Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC

Davis Wright Tremaine LLP
Day Carter Murphy
Dept of General Services
Diablo Canyon Independent Safety Committee
Douglass & Liddell
Downey Brand LLP

Duncan Weinberg Genzer Pembroke
Ellison Schneider & Harris LLP
Electrical Power Systems, Inc. Fresno
Engie North America
Engineers and Scientists of California

GenOn Energy, Inc.
Green Power Institute

Hanna & Morton LLP

ICF consulting

iCommLaw

International Power Technology
Intertie

Intestate Gas Services, Inc.

Kaplan Kirsch LLP
Kelly Group

Ken Bohn Consulting
Keyes & Fox LLP

Leviton Manufacturing Co., Inc.
Los Angeles County Integrated

Waste Management Task Force

MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McClintock IP
McKenzie & Associates
Modesto Irrigation District
NLine Energy Inc.
NOSSAMAN LLP
NRG Energy Inc.

Pacific Gas and Electric Company
Peninsula Clean Energy
Pioneer Community Energy

Public Advocates Office
Redwood Coast Energy Authority

Regulatory & Cogeneration Service, Inc.
Resource Innovations
Rockpoint Gas Storage

San Diego Gas & Electric Company
San Jose Clean Energy
SPURR

Sempra Utilities

Sentinel Utilities
Sierra Telephone Company, Inc.

Southern California Edison Company

Southern California Gas Company
Spark Energy

Sun Light & Power
Sunshine Design
Stoel Rives LLP

Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

Utility Cost Management

Water and Energy Consulting

Yep Energy