

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



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Application of Pacific Gas and Electric Company to Recover in Customer Rates the Costs to Support Extended Operation of Diablo Canyon Power Plant from January 1 through December 31, 2026, and for Approval of Planned Expenditure of 2026 Volumetric Performance Fees (U39E)

Application 25-03-015
(Filed March 28, 2025)

**CALIFORNIANS FOR GREEN NUCLEAR POWER'S
COMMENTS ON PG&E'S FALL UPDATE
AND THE ALJ'S ORDER DATED OCTOBER 3, 2025**

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October 20, 2025

I. Introduction and Summary

Californians for Green Nuclear Power, Inc's. (CGNP's) supports the perspective that the extended operations of Diablo Canyon Power Plant (DCPP) are extremely cost-effective. The revenue requirement was projected to be \$410 million prior to PG&E's Fall Update issued on October 8, 2025. CGNP noted that DCPP's **\$22.78** cost per megawatt-hour (MWh) during extended operation was at the upper range of operating a hydroelectric generation facility. The revenue requirement projection is based on the netting of DCPP's projected CAISO revenues and DCPP's cost of operations, as established by SB 846 (Dodd, 2022.)

Based on previous operational experience, during 2026 DCPP is projected to safely produce about 18 TWh, on the order of five times the annual production of Hoover Dam. (1 TWh - a terawatt-hour is a billion kilowatt-hours.) Neither generating facilities will produce air or water pollution during operations. Unlike Hoover Dam which only runs about a quarter of the time at full power, DCPP is 24/7/365 reliable with a capacity factor in excess of 90% - also far greater than the annual capacity factors of solar, wind, or batteries.

PG&E's Fall Update includes on page 12 Table 9-4. There is a Net Revenue Requirement Forecast of \$382.962 million. This forecast amount is \$27.028 million **less** than the previous DCPP Net Revenue forecast of \$410 million. CGNP calculates the 2026 DCPP net cost projection to be reduced to **\$21.28** per MWh. PG&E's Table 9-4 is reproduced on the next page.

TABLE 9-4
NET REVENUE REQUIREMENT FORECAST
(THOUSANDS OF DOLLARS)

Line No.	Chapter Cross Reference	Diablo Canyon Extended Operations*		
		2026 Cost (\$1000s)		
		Statewide (A)	PG&E Specific (B)	Total (C)
1	Operational Revenue Requirement			
2	Operation and Maintenance Cost Forecast	Chapters 2 & 4		
3	Resource Adequacy Substitution Capacity	Chapter 3		
4				
5	Subtotal Operational Revenue Requirement	752,534		752,534
6				
7	Management, Performance Fees, and Liquidated Damages			
8	Management Fee	Chapters 4 & 5		
9	Liquidated Damages	Chapters 4 & 5		
10	Volumetric Performance Fee	Chapters 4 & 5		
11	PG&E Specific Volumetric Performance Fee	Chapters 4 & 5		
12	Subtotal Statutory Fees	322,280	133,283	455,563
13	Total Cost Forecast (Line 5 + Line 12)	1,074,813	133,283	1,208,097
14	Offsetting Market Revenues			
15	CAISO Market Revenues	Chapter 6		
16	Balancing Account Amortization			
17	DCEOBA	Chapter 8		
18	Subtotal Net Cost (Line 13 + Line 15 + Line 17)	244,291	133,283	377,575
19				
20	RF&U (PG&E) + FF&U (SCE) and FF&U (SDG&E) ^b	Chapter 10		
21	DCEO Revenue Requirement for Ratesetting	248,010	134,952	382,962

Notes:

- (a) Amounts in 2026 dollars (\$s)
(b) SDG&E FF&U revenue for its DCNBC will be collected in Distribution Charge

On PG&E's Fall Update page 20 there is a section on the "Diablo Canyon NBC," where NBC is the non-bypassable charge. This charge is minuscule. Table 10-5 shows the highest 2025 DCNBC (Diablo Canyon non-bypassable charge) is for the residential customer class. This charge is a mere \$0.00432 per kWh. The lowest value is an even lower \$0.00192 per kWh for the industrial customer class.

CGNP believes that PG&E's Table 1-1 for 2023-2030 extended operations costs, revenue credits, and societal benefits should be denominated in thousands of dollars instead of the millions of dollars shown.

PG&E supplies a pair of spreadsheets on the final two pages (AtchC-1 and AtchC-2) of their Fall Update which has very small type. Using magnification, CGNP determined in AtchC-1 that the EO (Extended Operations) Subaccount ending balance after interest remains positive in each column from January, 2025 through December, 2025 with the December, 2025 balance at \$11,424,515.

Here are the magnified headings and totals for the left half of AtchC-2:

8/31/2025

Tariff Description	2023 - 2025 Total Costs and Revenues	2023 - 2025 Forecast Cost and Revenue	Variance = Actuals - Forecast	
Extended Operations Subaccount - GL# 1823380				
EO Subaccount Ending Balance after Interest	Total Costs	1,217,132,580	1,325,382,242	(108,249,661)
	Total Revenues	(1,205,708,065)	(1,325,382,242)	119,674,177
	Ending Balance	11,424,515	-	

The rightmost column headings are almost unreadable red type on a blue background. The text reads, "Variance = Actuals - Forecast." Total 2023-2025 costs of \$1,217,132,580 were \$108,249,661 less than the 2023-2025 forecast cost. With a diminution in total revenue of \$119,674,177, the difference between 2021-2025 total costs and revenues is \$11,424,515 which is an insignificant fraction of the total 2023-2025 revenues of \$1,205,708,065. This difference matches the EO subaccount balance for December, 2025 in AtchC-1. CGNP respectfully requests that actual spreadsheets be supplied in the future instead of PDFs with microscopic type sizes.

The ALJ stipulated in his order dated October 3, 2025 that intervenors could comment on the escalation methodology PG&E used to calculate their fixed management fee as an *addition* to the scope of this Proceeding. Regarding the cost escalation methodology for PG&E's management fee, there is almost undetectable ratepayer impact as the cost escalation methodology is changed. A \$100 million annual fee (in constant 2022 dollars) to safely and efficiently manage

Diablo Canyon Power Plant (DCPP) with a likely market value on the order of \$10 billion is a minor fraction of the annual total cost of DCPP operations that could be determined from the statistics in the previous paragraph. (Peer investor-owned utilities managing similar nuclear power plants elsewhere in the United States likely receive far greater annual management fees than DCPP's owner.)

Consequently, CGNP holds that it was an abuse of discretion by ALJ Jack Chang, Ph.D. to ignore CGNP's July 11, 2025 Motion to Amend the Scoping Memo of this Proceeding in light of the experience in Spain and Portugal during the mid-day April 28, 2025 Iberian Peninsula Blackout which cost the equivalent of billions of U.S. dollars in lost productivity and damaged production equipment. In addition, at least eleven people that were depending on reliable power on the Iberian Peninsula died. California remains on track to emulate this mid-day blackout as a consequence of the state's overreliance on solar and wind generation at mid-day, particularly during DCPP refueling outages. As CGNP has repeatedly noted, solar, wind, and batteries **fail to supply** meaningful amounts of synchronous grid inertia (SGI,) an **essential grid reliability service**. On the other hand, DCPP supplies the greatest amount by far of SGI of any in-state generator. DCPP's owners still fail to receive any economic rewards for supplying this essential grid reliability service.

As confirmation of ALJ Dr. Jack Chang's apparent bias, first here is an excerpt from a July 21, 2025 Ex-parte communication report filed by PG&E,

"On July 17, 2025, PG&E hosted a tour at the Diablo Canyon Power Plant (DCPP) in connection with this proceeding from approximately 8:00 am to 3:00 pm. Present at the below-described communications included PG&E representatives: Thomas Jones, Brian Ketelsen, Dylan George, Lillian Rafii, and Michael Wagoner. Also in attendance were assigned Administrative

Law Judge Jack Chang from the Commission, Wayne A. Parker from the Public Advocates Office, and Gene Nelson from Californians for Green Nuclear Power."

Shortly after the beginning of the July 17, 2025 tour, six of the tour attendees (Chang, Parker, Jones, George, Rafii, and Nelson) were on a PG&E-provided bus transporting us from PG&E's Energy Education Center to Diablo Canyon Power Plant. We were having a collegial Q&A period regarding DCP. Dr. Chang asked a question regarding DCP plant operations. I began to respond. Dr. Chang stopped me. He said that he wanted to hear the answer from PG&E instead.

Later in the tour after we had walked the more than two football field's



length of the turbine building and were in front of the Unit 1 generator, I asked PG&E for the weight that was spinning at 1,800 RPM of each of the generators plus turbines. We later received the answer that over 50 tons each (over one million pounds) was spinning at 1,800 RPM. This is the reason why DCP provides the greatest amount of SGI of any California power plant.

Here's my photo wearing a green CGNP t-shirt taken by

PG&E's Lillian Rafii while on the July 17, 2025 tour. The back of my green CGNP

t-shirt has a stylized DCPD drawing including a whale's tail offshore with the text, "Save Diablo Canyon
California's #1 source of Safe, Carbon-Free Energy."

I have concerns that Dr. Chang brings an apparent bias against nuclear power advocates such as myself (which perhaps extends to opposing Diablo Canyon extended operations) into this proceeding. During July and August, 2025, he denied a pair of CGNP's motions while ignoring CGNP's July 11, 2025 Motion to Amend the Scoping Memo. Supporting my contention, I've appended Dr. Chang's self-written LinkedIn resume with some annotations. His highlights at the top of his resume include "Administrative Law Judge," "Renewable Hydrogen," and "Solar Development." I also include a reference to Dr. Chang's solar power advocacy article from August, 2019 written while he served as a Market Research and Energy Policy Intern for Strategen. I believe it is a conflict of interest to have a self-described renewable energy advocate serve as a CPUC ALJ for the Diablo Canyon 2026 Cost Proceeding. Dr. Chang should have recused himself from this assignment.

II. Conclusion

Independent nonprofit intervenor CGNP has provided an in-depth engineering and economic analysis supporting DCP's 2026 extended operations for the benefit of California ratepayers and the environment.

Dated: October 20, 2025

Respectfully submitted,

/s/ Gene A. Nelson, Ph.D.

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Contact

www.linkedin.com/in/jack-chang-16653a2 (LinkedIn)
www.jack-chang.net (Personal)

Top Skills

Utility Ratemaking
Modeling
Data Analysis

Languages

English (Native or Bilingual)
Chinese (Professional Working)
Spanish (Full Professional)
Portuguese (Professional Working)
French (Elementary)

Certifications

Graduate Certificate of Applied Data Science

Appendix: Annotated Jack Chang, Ph.D. Biography

Jack Chang

Administrative Law Judge | Energy Research and Development
| Building Decarbonization | Renewable Hydrogen | Solar
Development

San Francisco Bay Area

Summary

I'm an energy and climate professional who is committed to finding solutions to the world's urgent environmental challenges. I have focused on energy regulatory policy around the world and have also worked on organizational sustainability best practices and studied climate change mitigation policy in California. I've developed a toolbox of financial, statistical and policy analysis skills.

In the first part of my career, I worked as a writer, editor and multimedia journalist on four continents for two decades - including serving as the South America bureau chief for Knight Ridder/McClatchy and a Beijing-based correspondent for The Associated Press.

Experience

California Public Utilities Commission

5 years

Administrative Law Judge

September 2024 - Present (1 year 2 months)

San Francisco

Oversee applications, rulemakings, complaints, and other proceedings at the California Public Utilities Commission. Assigned proceedings include cost recovery for the Diablo Canyon Power Plant, high distributed energy resources, and utility and gas storage safety culture.

Senior Advisor to Commissioner Matthew Baker

March 2024 - September 2024 (7 months)

San Francisco, California, United States

Advised Commissioner Matt Baker on transportation, energy, and other regulatory issues. Helped to coordinate conflict analysis, proceeding management, and new advisor onboarding.

Senior Advisor to Commissioner Genevieve Shiroma

March 2023 - February 2024 (1 year)

San Francisco Bay Area

Advised Commissioner Genevieve Shiroma on energy, and transportation issues. Focused on energy research, microgrid, and transportation network companies proceedings. Helped coordinate office workflows, proceeding management, and office online tools.

Public Utilities Regulatory Analyst

November 2020 - March 2023 (2 years 5 months)

San Francisco, California, United States

Lead hydrogen analyst for the California Public Utilities Commission helping to develop a hydrogen road map for the Commission, among other tasks. Also helped to coordinate Phase 3 of the Commission's affordability proceeding through the first half of 2022.

Previously oversaw research and development programs at the California Public Utilities Commission, in particular the Electric Program Investment Charge and natural gas research programs. Also oversaw the Policy + Innovation Coordination Group facilitating dialogue among policymakers, research program administrators, and researchers.

University of California, Berkeley

7 years

Course Instructor

August 2017 - 2024 (7 years)

Created and taught a climate communications reading and composition course at the History of Art department over three semesters. Also taught a reading and composition course at the Rhetoric department, two sections of a Media Studies class, and two sections of an environment regulation and policy class.

Fellow at the Office of Sustainability

December 2017 - November 2020 (3 years)

Berkeley

Helped UC Berkeley's Office of Sustainability complete its first ever submission to the Sustainability, Tracking, Assessment and Rating System, or STARS. The campus earned a high Gold rating, coming in 11th out of 349 campuses around the world with full STARS submissions. Also helped UC Berkeley update its Sustainability Plan.

Project Manager/Communications Coordinator at Global Policy Lab and Climate Impact Lab

June 2018 - March 2020 (1 year 10 months)

Berkeley

Served as the project manager for the Climate Impact Lab and the Global Policy Lab at UC Berkeley supporting researchers estimating the impacts of climate change on mortality rates, energy use, agricultural yields, and other factors. Coordinated communications and research for the lab.

Technical Editor

November 2017 - September 2018 (11 months)

Berkeley

Helped compile research resources and edit the Bay Area Report of California's 4th Climate Change Assessment.

Candela Renewables, LLC

Development Researcher

June 2020 - October 2020 (5 months)

Assisted the development and origination teams with market and land research as well as with project development.

Common Spark Consulting

Consultant

January 2020 - October 2020 (10 months)

Helped facilitate stakeholder meetings on building decarbonization processes in San Francisco as well as researched a range of decarbonization policies for groups such as The Greenlining Institute, the Building Decarbonization Coalition, and the Natural Resources Defense Council. Organized webinar series on long-term gas planning for the Building Decarbonization Coalition. Helped prepare communications materials for the Montgomery County Green Bank.

California Public Utilities Commission

Researcher

January 2020 - August 2020 (8 months)

San Francisco

Conducted research for the California Public Utilities Commission's Energy Division on interconnection standards for biogas and hydrogen in natural gas infrastructure. Wrote a white paper on hydrogen interconnection standards globally as well as a staff report on biogas procurement standards and cost

effectiveness tests. Helped the Wildfire Safety Advisory Board evaluate utility wildfire mitigation plans.

Strategen

Market Research and Energy Policy Intern

April 2019 - March 2020 (1 year)

Berkeley

Worked with Strategen's consulting team on renewable energy cash flow analysis, regulatory research, business development, and other duties in energy regulation and policy. Helped conduct the analysis for **Sierra Club reports on replacing coal-fired generation in Colorado and Arizona with renewable energy.**

Jack Chang August 2019 Solar power advocacy article: "Initiatives for California to overcome its challenges in the sun," Jack Chang and Janice Lin, pages 32-35, *PV Power Plant Technology and Business*, August 2019. <https://solar-media.s3.amazonaws.com/assets/Pubs/PVTP%2020/PVTP20.pdf> From Jack's biography at the end of the article with the same photograph "Jack is also project manager for the Climate Impact Lab and the Global Policy Lab at UC Berkeley."

The Sacramento Bee

Editor

June 2015 - August 2017 (2 years 3 months)

Sacramento, California Area

Led reporting teams covering health, the environment, business, immigration, food, and other topics. We produced in-depth enterprise stories, shorter takeouts, and breaking news for a leading newspaper in Northern California. Topics included the Zika virus, Trump administration immigration policies, Covered California, the Aliso Canyon methane leak, California's craft beer industry, and the successful separation of conjoined twins Eva and Erika Sandoval. Worked closely with online and multimedia teams to maximize online audiences.

The Associated Press

4 years 3 months

Correspondent

April 2014 - June 2015 (1 year 3 months)

Beijing City, China

Covered climate change and other environmental issues as well as technology and general news in greater China. Worked with TV, photo, and interactive teams to produce multiformat story packages. My articles included in-depth looks at China's attempts to transition away from coal, the pro-democracy movements in Hong Kong, and China's burgeoning tech industry.

Latin America Desk Editor

April 2011 - April 2014 (3 years 1 month)

Mexico City

Coordinated and edited enterprise stories across Latin America and the Caribbean. Worked with English- and Spanish-language writers and bureau chiefs across the region as well as with TV and photo teams. Helped cover the death of Venezuelan President Hugo Chavez, safety problems in cars manufactured in Brazil, and growing economic ties between Latin America and China. Pitched in on stories outside the region including helping to cover unrest in Egypt after the ousting of President Mohamed Morsi and producing spot news and investigations about the death of 19 firefighters near Yarnell, Arizona.

The Sacramento Bee

Political Writer

August 2009 - April 2011 (1 year 9 months)

Sacramento, California

Covered the 2010 California governor's race and later investigated wasteful practices in California state government. Produced photos, video, audio, and interactive features on a highly competitive beat. Also blogged, tweeted, and built a vibrant social media presence.

The Daily Journal

Associate Editor

February 2009 - July 2009 (6 months)

Supervised and edited six reporters covering the U.S. Supreme Court, Congress, Silicon Valley, environmental issues, the 9th U.S. Circuit Court of Appeals, and the California State Bar. Helped maintain a legal affairs blog.

McClatchy Newspapers

South America Bureau Chief

May 2005 - February 2009 (3 years 10 months)

Rio de Janeiro, Brazil

Ran Knight Ridder/McClatchy's South America bureau, covering eight countries in three languages and coordinating freelancers across the region. Shot many of my own photos as well as produced audio and video packages to go with the stories. Covered issues such as environmental devastation in the Brazilian Amazon, the rise of women leaders across the region, and human rights prosecutions in Argentina and Chile. Managed a three-person bureau staff. Won the Embratel Prize for foreign reporting, one of Brazil's most prestigious journalism awards.

Contra Costa Newspapers

Immigration/Diversity Reporter
May 2000 - May 2005 (5 years 1 month)
Walnut Creek, California

Covered immigration, census reports, diversity issues, and social services across Northern California for an East Bay newspaper chain. Was awarded with a 2002 third-place Best of the West award from Arizona State University's journalism school for a five-part series on changes to the U.S. immigration system. Also won a first-place short feature award from the East Bay Press Club for a story about more people learning Spanish.

ANG Newspapers
Social Issues Reporter
December 1998 - May 2000 (1 year 6 months)
Oakland, California

Covered social services and minority communities across Northern California for a Bay Area newspaper chain. Won a third-place East Bay Press Club award for a story about Kosovar refugees struggling to integrate into an East Oakland neighborhood.

Pasadena Star-News
City/Education Reporter
March 1996 - June 1998 (2 years 4 months)
Pasadena, California

Wrote about four cities, two school districts, and general news in Southern California. Won a first-place Los Angeles Press Club best series award for a project about local impacts of Hong Kong's return to Chinese rule.

Education

https://www.usfca.edu/faculty/jack-chang His University of San Francisco biography shows a Ph.D. awarded in 2025 https://openreview.net/profile?id=~Jack_Chang2 Shows his UC Berkeley 2020-2025 Ph.D. thesis advisor was Daniel Kammen
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University of California, Berkeley
Doctor of Philosophy - PhD, Energy and Resources

University of California, Berkeley
Master of Arts - MA, Energy and Resources · (2017 - 2020)

University of California, Berkeley, Goldman School of Public Policy
Master of Public Policy · (2018 - 2020)

University of California, Riverside
Master of Fine Arts, Creative Writing · (2014 - 2016)

Northwestern University

Master of Science, Journalism · (1994 - 1995)