

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

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Order Instituting Rulemaking to Establish Energization Timelines.

Rulemaking 24-01-018 (Filed January 25, 2024)

#### PACIFIC GAS AND ELECTRIC COMPANY'S (U 93 E) BIANNUAL ENERGIZATION REPORT PURSUANT TO DECISION 24-09-020

#### PUBLIC VERSION (ATTACHMENT TO REPORT CONTAINS CONFIDENTIAL INFORMATION)

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Attorneys for PACIFIC GAS AND ELECTRIC COMPANY

Dated: March 31, 2025

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Pursuant to Ordering Paragraph 18 of Decision (D.) 24-09-020, issued September 17,

2024, Pacific Gas and Electric Company (PG&E) hereby files the public version of its first

Biannual Energization Report (Report), dated March 31, 2025.

PG&E filed a concurrent filing of the confidential version of the Report and attachments.

The attachments to the Report contain confidential information as set forth in PG&E's Motion

for Leave to File Under Seal, dated March 31, 2025.

Respectfully Submitted,

PACIFIC GAS AND ELECTRIC COMPANY

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Dated: March 31, 2025

# PACIFIC GAS AND ELECTRIC COMPANY

BIANNUAL ENERGIZATION REPORT PURSUANT TO DECISION 24-09-020

March 31, 2025

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# **Biannual Energization Report** 1. Report Summary

# A. Background and Context

On September 12, 2024, the California Public Utilities Commission (Commission or CPUC) adopted D.24-09-020, *Decision Establishing Target Energization Time Periods and Procedure for Customers to Report Energization Delays* (the Decision). Ordering Paragraph 18 directs the utilities to each file and serve biannual energization reports to the CPUC every six months to demonstrate compliance with the statewide targets outlined in Section 7 (*Energization Targets*) of the Decision.<sup>1</sup> In accordance with the Decision, this report uses the Energization Data Reporting Template that was developed in consultation with Energy Division and stakeholders, and subsequently approved in Joint IOU Advice Letter 7430-E, et al., and Joint IOU Advice Letter 7430-E-A, et al.<sup>2</sup>Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide data in response to Decision 24-09-020, which establishes target energization time periods and procedures for customers to report energization delays. We acknowledge the importance of these measures in improving service delivery and customer satisfaction. Below, we provide our comments and data in response to the decision.

PG&E recognizes the legislative intent behind Senate Bill 410 and Assembly Bill 50 to enhance accountability and transparency in the energization process. We are committed to meeting the established targets and improving our processes to better serve our customers.

- **Data Reporting Period:** New Business Orders with Complete Applications from January 31, 2023, to December 31, 2024.
- **Reporting Data Compiled as of:** March 20<sup>th</sup>, 2025

# **B. Report Structure**

For this first energization report, D.24-09-020 OP18 states the report must reflect data for all customer energization requests submitted as of January 31, 2023, to the best of

<sup>&</sup>lt;sup>1</sup> D.24-09-020, OP 18.

<sup>&</sup>lt;sup>2</sup> <u>https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC\_7430-E.pdf</u> and <u>https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC\_7430-E.A.pdf</u>

Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison (the large electric investor-owned utilities (IOUs)) abilities.

PG&E's reporting has been broken out into three separate sections for both the Tariff and Main Panel Upgrade templates. These breakouts were produced to enhance the readability and comprehension of the report. Those sections are defined as:

- In Progress Projects: New business applications submitted 1/31/23-12/31/24 and NOT yet completed.
- **Completed Projects:** New business applications submitted 1/31/23-12/31/24 and completed through 3/20/25.
- **Cancelled/Rejected Applications:** New business applications submitted 1/31/23-12/31/24 that were cancelled or rejected.

# **C. Energization Targets**

PG&E is dedicated to achieving the average and maximum energization targets set forth in the decision. The average energization targets include the time the large electric IOUs take to complete the steps of the energization processes that are fully within the large electric IOUs' control.<sup>3</sup> Below are the average energization timelines PG&E achieved for Completed Projects. The following energization timelines exclude In Progress Projects and Cancelled/Rejected Applications. Approximately 59% of the applications submitted in 2023 and 2024 were not complete by the 3/20/25 reporting capture date and are excluded from the average energization timelines below. Projects used to calculate the energization timelines below are based on the 41% of applications submitted 1/31/23-12/31/24 that were completed by March 20, 2025. The timelines below represent less than half of applications submitted January 31, 2023 through December 31, 2024.

- Electric Rule 15
  - PG&E has no Rule 15-only jobs to report for this filing period as such jobs are uncommon.
- Electric Rule 16\*

<sup>&</sup>lt;sup>3</sup> D.24-09-020 FOF 2.

- Total Projects Submitted on 1/31/23-12/31/24 and Completed Through 3/20/25: 5,882
- Average Energization PG&E Calendar Days: 122.45
- Average End to End Energization Cycle Calendar Days: 306.97
- Percent of Completed Jobs Under Maximum Energization Days: 97.9%
- Electric Rule 29\*
  - Total Projects Submitted on 1/31/23-12/31/24 and Completed Through 3/20/25: 56
  - Average Energization PG&E Calendar Days: 119.79
  - Average End to End Energization Cycle Calendar Days: 466.66
  - Percent of Completed Jobs Under Maximum Energization Days: 96.4%

### • Combined Electric Rules 15/16/29\*

- Total Projects Submitted on 1/31/23-12/31/24 and Completed Through 3/20/25: 3,104
- Average Energization PG&E Calendar Days: 119.14
- Average End to End Energization Cycle Calendar Days: 320.59
- Percent of Completed Jobs Under Maximum Energization Days: 96.4%

### • Main Panel Upgrades\*\*

- Total Projects Submitted on 1/31/23-12/31/24 and Completed Through 3/20/25: 21,632
- Average Energization PG&E Calendar Days: 50.99
- Average End to End Energization Cycle Calendar Days: 61.38
- Percent of Completed Jobs Under Maximum Energization Days: 59.0%

## D. Upstream Capacity Upgrades

We acknowledge the complexity of upstream capacity upgrades and the need for clear timelines. PG&E is committed to improving our planning and execution in this area.

- New Circuit/Circuit Upgrade Calendar Days\*: 1142.10 calendar days
- Substation Upgrade Calendar Days\*: 1307.07 calendar days
- **New Substation Calendar Days:** PG&E has no new Substations completed within this filing period.

\*Average days and percent under maximum are based on only completed projects within the designated reporting window. The project reporting window, availability of IOU Site Readiness Data, and availability of Service Energization data may artificially lower overall elapsed project times, see section **1E. Trending and Overall Report Findings** for more details.

\*\*Main Panel Upgrade projects are captured under annual blanket orders at PG&E making it difficult to delineate the required energization phase structure, see section **3C. Reporting Gaps-Main Panel Upgrade** (MPU) Projects for more details.

# E. Trending and Overall Report Findings

PG&E is committed to providing comprehensive insights into our performance and progress. Below we've included a brief summary of trending information and overall findings and some important data considerations.

Energization Timelines: Between 2023 and 2024 PG&E saw relative stability in the number of days it took to execute on a new business project through energization. During this same period PG&E saw a small increase in standard deviation days in the end-to-end total job cycle time, indicating slightly more variability in project completion times through the beginning of 2025. The time taken for PG&E controlled steps has climbed slightly over the reporting window.

PG&E is also committed to enhanced communication with customers, implementation of improved processes, and a continued emphasis on project execution in order to reduce overall IOU controlled project duration. To achieve this mission continued funding is paramount to our success. The additional funding via SB410 has been critical in stabilizing overall project timelines at PG&E. In order to continue this stabilization and shift toward a decrease in overall end-to-end project days we will need increased funding in order to fulfill the steadily rising demand for new electrical service in California. Moving into 2025, we anticipate a potential increase in the amount of time required to complete projects. This increase is due in part to the constraints of the current reporting window (1/31/23-12/31/24). When accounting for jobs that are submitted and completed within a specific 2-year window, energization phases may statistically skew lower on average due to the exclusion of potentially longer running n Progress projects. It is worth noting, that roughly 59.1% of the jobs submitted within the first reporting window were not complete by the 3/20/25, reporting capture date. This percentage represents a potential backlog of work that will result in a significant increase in overall job timelines.

Other factors that may increase PG&E's future energization timeline reports include implementation of more robust data collection methods and systems, primarily in the IOU Site Readiness phase via Salesforce enhancements and the Service Energization phase via more comprehensive and complete meter set data. IOU Site Readiness is measured by the time between the Requested Inspection Date and the actual 1<sup>st</sup> Inspection Date. This data is currently only available for 21 of 8,919 completed jobs in the current reporting window. The Service Energization phase is measured by the time between and meter set. This data is only available for 3,339 of 8,919 completed jobs in the reporting window. As we refine our Service Energization data and build out more comprehensive IOU Site Readiness, we expect those results will increase PG&E's overall average energization calendar days.

Lastly, another possible factor that may contribute to increased timelines include the planned expansion of the reporting window leading to the capture of longer-term jobs outside of the current window. These changes are expected to provide a more comprehensive overview of PG&E energization timelines and ensure compliance with reporting standards.

As we look toward the future PG&E remains committed to continuous improvement and innovation. Our future plans will require significant investments in technology, process enhancements, and customer engagement initiatives to ensure we meet and exceed regulatory expectations.

# F. IOU Time & Customer Time Methodology

PG&E employs the following methodology to measure IOU (Investor-Owned Utility) time and Customer Time. This approach ensures accurate accounting and delineation of time across the energization phases.

### **Phase Responsibility:**

- PG&E Time is attributed to operational phases 2, 4, 6, 7, and 8.
- Customer Time is limited to phases 1, 3, and 5.

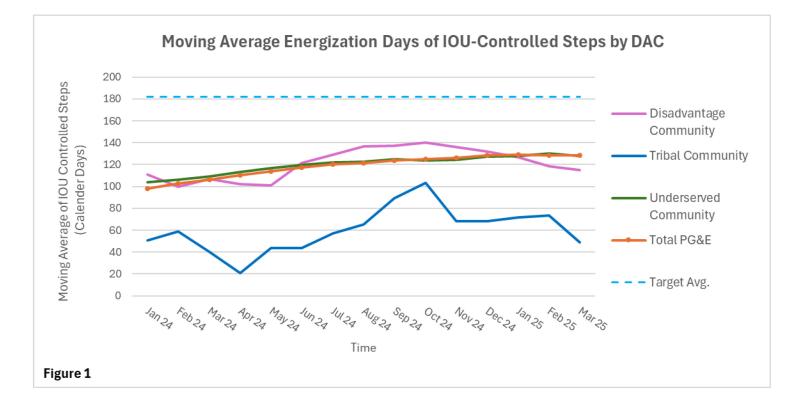
### PGE Methodology Principles:

- Customer Overlap in Phases: When a customer phase coincides with a PG&E phase (e.g., a customer-related process occurs simultaneously with a PG&E process) this overlapping time is exclusively categorized as customer time and not attributed to PG&E time. This ensures that shared time is not double counted.
- 2. Concurrent PG&E Phase Work: In cases where PG&E undertakes multiple overlapping phases concurrently (e.g., two PG&E processes happen at the same time), those overlapping days are not counted multiple times. Instead, they are aggregated as a single day within the total PG&E time count. This prevents inflating time metrics and maintains the integrity of the report.

By adopting this methodology, PG&E ensures a clear distinction between the contributions of IOU and customer time, fostering transparency and consistency in the measurement and reporting of time allocation.

### 2. Required Supplemental Reporting

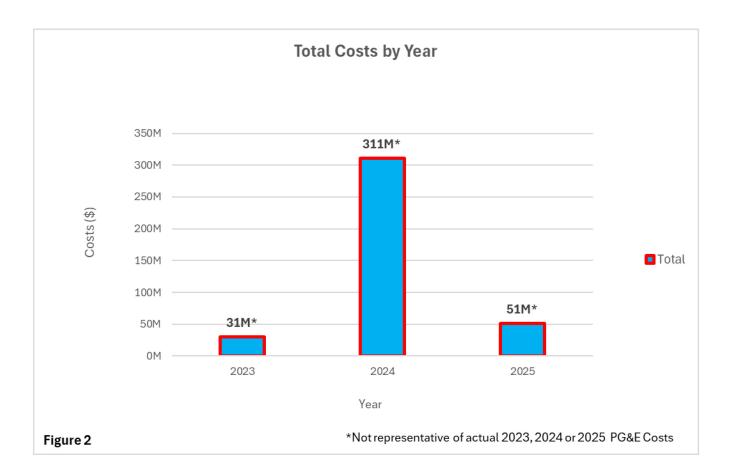
## A. ESJ (Environmental & Social Justice) Barriers and Findings



**Figure 1:** Monthly Energization Days (6-Month Moving Average) with IOU Controlled Steps for Disadvantage Community, Tribal Community, Underserved Community, and Total PG&E vs. Target Average (Jan 2024 - Mar 2025)

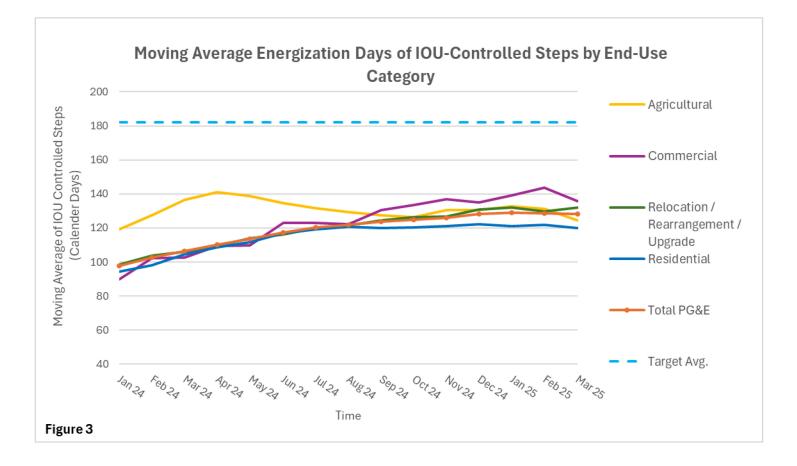
Figure 1 displays the six-month moving average of energization days with IOU Controlled Steps for Disadvantage Community, Tribal Community, and Underserved Community, along with total PG&E energization days, compared to the target average of 182 days. The use of a six-month moving average smooths short-term fluctuations, providing a clearer view of long-term trends. The last 6 months of 2023 have been removed from figure 1 because the typical energization lifecycle of a job may not be fully accounted for and could skew overall trending results.

### **B. Overall Costs**



#### Figure 2: Annual Costs of Completed Jobs in 2023, 2024, and 2025

Figure 2 illustrates the costs for completed jobs in 2023, 2024 and 2025, reflecting expenses incurred at the time of energization in those years. These figures do not correspond to PG&E's actual new business project expenditures for the respective years but have been provided to ensure adherence to reporting requirements. Costs are presented at the time of energization, which often excludes expenditures reconciled during financial closure. Due to FERC accounting standards, financial closure can occur from six months to one year after energization. Additionally, customer payments made to PG&E at project initiation may result in negative total project costs in our provided datasets. A negative project accounting balance in the form of a credit from the customer may not be fully reconciled until financial closure, which rarely occurs at the time of energization. For additional details, please refer to Section 3C. Reporting Gaps-Additional Reporting Disclaimers- Costs at Time of Energization.



## C. End-Use Category Review

**Figure 3 :** Monthly Energization Days (6-Month Moving Average) with IOU Controlled Steps for Residential, Commercial, Agricultural, Relocation/Rearrangement/Upgrade, and Total PG&E vs. Target Average (Jan 2024 – Mar 2025)

Figure 3 illustrates the six-month moving average of energization days with IOU Controlled Steps across four end-use categories (Residential, Commercial, Agricultural, and Relocation/Rearrangement/Upgrade) alongside total PG&E energization days, benchmarked against the 182-day target average. The application of a six-month moving average enhances trend visibility by reducing short-term fluctuations, providing a clearer view of long-term trends. The final 6 months of 2023 have been removed from figure 3 because the typical energization lifecycle of a job may not be fully accounted for and could skew overall trending results.

## 3. Reporting Gaps

## A. Data Gaps and Initiatives

PG&E is committed to transparency and accountability in our reporting processes. Below PG&E has provided a reference table and detailed narrative explanation of information collected in our existing systems that does not currently meet the targets adopted in Decision 24-09-020 and as such has been deemed non-reportable for this report submission.

### Non-Reportable Table-

(See table below)

Description Reference	Data Point	Delay Cause	Est. Date Available	Est. Reporting Date
1a	Total Site Capacity at Time of Customer's Application for Service (kW) -9I-	Unable to source meter level capacity data on the majority of new business work.	6-30-25	9-30-25
2a	Additional Capacity (kW) installed for future electric load deployment (as applicable) -11K-	Data not currently tracked, only rare instances in which we provide load for future deployment at the job level.	6-30-25	9-30-25
За	Project triggered for upstream capacity project (Yes/No) -13M-	Only able to report on active and ongoing capacity work, no historic capacity upgrade data available.	7-31-25	9-30-25
За	Date IOU identifies the need for an upstream capacity project and alerts customer of need for upstream capacity	Only able to report on active and ongoing capacity work, no historic capacity upgrade data available.	7-31-25	9-30-25

3a 3a 3a	project (Date) -14N- Date IOU completes the upstream capacity project (Date) -15O- Time to complete upstream capacity project	Only able to report on active and ongoing capacity work, no historic capacity upgrade data available. Only able to report on active and ongoing capacity work, no historic capacity upgrade data available.	7-31-25	9-30-25 9-30-25
4a	(Calendar Days) -16P- Did customer install additional capacity to	Data not available; PG&E reviews and generally provides the amount	Unknown	Unknown
	support future load growth? (Yes or No) -20T-	of service requested independent of future need.		
4b	Customer elected to install additional capacity to anticipate associated future load growth as indicated on customer's application (Yes or No) -24X-	Data not available; PG&E reviews and generally provides the amount of service requested independent of future need.	Unknown	Unknown
5a	Identify when in energization process the customer requested a change in design or scope (Energization Step) -22V-	Tracking enhancement available in Salesforce extension, pending rollout and adoption by PG&E job representatives.	6-30-25	9-30-25
5b	Customer cancelled/delayed project (as needed) (Yes or No) -23W-	Customer cancelled jobs are reported on a separate template, customer "delay" requires further definition and tracking.	Unknown	Unknown
6a	Estimated timing for when customer anticipates additional capacity necessary as indicated on customer's	Item not captured on current customer intake application, pending application field update or process change.	12-31-25	3-31-26

6b	application (Date) -25Y- Total additional kW capacity for the necessary future upgrade as listed on customer's application (kW) -26z-	Item not captured on current customer intake application, pending application field update or process change.	12-31-25	3-31-26
7a	If full energization of applicant site not feasible in a timely manner, explanation whether load management/flexible service options were installed/utilized to provide applicant with timely service -27AA-	Data not made available in time to meet reporting submission date. Currently only able to report on active and ongoing customer load limiting, no historic load limit data available.	7-31-25	9-30-25
7a	Amount of load (kW) provided to applicant using flexible service options (kW) -28AB-	Only able to report on active and ongoing customer load limiting, no historic load limit data available.	7-31-25	9-30-25
7a	At the time energization provided, remaining (or total) unserved load requested by the applicant (kW) -29AC-	Only able to report on active and ongoing customer load limiting, no historic load limit data available.	7-31-25	9-30-25
7a	Estimate when full service will be provided to the applicant for customers using flexible service and/or receiving tiered load schedules (Date) -30AD-	Only able to report on active and ongoing customer load limiting, no historic load limit data available.	7-31-25	9-30-25
8a	For R15/R16 tariffs, the time the project was	Tracking enhancement available in Salesforce extension, pending	12-31-25	3-31-26

9a	delayed due to customer requested change in design or change in project scope (Calendar Days) -37AK- Project Costs (\$\$\$) for all IOU equipment for upstream capacity projects: Electric Rule 15, Electric Rule 16, and Electric Rule 29/45 -41AO-	rollout and adoption by PG&E job representatives. Not currently able to produce overhead equipment costs specific to capacity work.	7-31-25	9-30-25
10a	R15/R16/R29 Energization Reasoning as to why exceeded average/maximum Energization Target (Reasoning) -95CQ-	Currently able to report reason identification for jobs exceeding maximum allowable days. Reason was determined by phases exceeding the recommended average by 1 or more days.	12-31-25	3-31-26
11a	Location of project exceeding the maximum energization target: Location (circuit level) -96CR-	Unable to source circuit level location data for projects exceeding their maximum allowable days.	6-30-25	9-30-25
12a	IOU reason for rejection of application (Reason) -51AY-	Application cancellation reason is a recordable field but is not actively utilized by PG&E job representatives.	12-31-25	3-31-26
13a	Amount of load (kW) provided to applicant using flexible service options (kW) -28AB-	Unable to source load limit amounts for initial reporting.	6-30-25	9-30-25
14a	Timing for identifying need for R15/16/29/45 upgrade (Calendar Days) -31AE-	Unable to source the necessary task completion date to reconcile timing.	7-31-25	9-30-25

# **B. Description Reference**

• **1a- Total Site Capacity at Time of Customer's Application for Service:** PG&E is currently undergoing data enhancements which will help to capture available

capacity at the time of a customer's application based on transformer to line to meter (TLM) level data.

- **2a- Additional Capacity installed for future electric load deployment:** In adherence with CPUC regulations and programs, PG&E only installs capacity based on projected demand and regulatory guidelines to ensure grid reliability and efficiency. PG&E is focused on ensuring sufficient capacity to meet peak demand plus a reserve margin and does not typically install excessive capacity.
- 3a- Mapping of New Business Order to Distribution Upstream Capacity (DUC) Project:

PG&E has begun a data enhancement project that tracks all new upstream capacity projects to new business orders as well as a data retention policy for 3/1/25 and onwards for closed and completed projects. We are currently only able to report on active and ongoing capacity upgrades in relation to downstream job impact.

- **4a- Customer installation of additional capacity to support future load growth:** In adherence with CPUC regulations and programs, PG&E only installs capacity based on projected demand and regulatory guidelines to ensure grid reliability and efficiency. PG&E is focused on ensuring sufficient capacity to meet peak demand plus a reserve margin, but it does not typically install excess capacity.
- 4b- Customer elected to install additional capacity to anticipate associated future load growth as indicated on customer's application: PG&E does not support additional load requests on closed or ongoing orders, customers are asked to submit a new application.
- **5a- Identify when in energization process the customer requested a change in design or scope:** A direct option for a customer requested scope/design change has been built out as part of a Salesforce tool enhancement but is not currently being fully utilized by job owners and representatives. This data enhancement is pending an additional training rollout to PG&E staff involved in new business project management.

- **5b Customer cancelled/delayed project (as needed):** Customer cancelled projects are included under the Cancelled projects reporting template separate from the primary Completed and In Progress work templates. In order to identify projects delayed by the customer PG&E needs further definition of the term "delay" as the vast majority of projects experience some form of a customer-based delay at some point in the energization process.
- 6a- Estimated timing for when customer anticipates additional capacity necessary as indicated on customer's application: PG&E's current intake application does not support additional future load requests it only captures total load required. For additional future load the customer must submit new or additional applications.
- 6b- Total additional kW capacity for the necessary future upgrade as listed on customer's application: Echoing item 7a above, PG&E's current intake application does not support additional future load requests it only captures total load required. For additional future load in kW the customer must submit new or additional applications.
- **7a- Load management/flexible service options:** Our current process is for customers who receive a Load Limit Letter from PG&E (in which the customer is informed that their full load cannot be served without grid upgrades) to also receive a brief overview of the Flex Connect Pilot with instructions on how to contact the team to determine eligibility.

Flex Connect is supported currently as a bridging solution to customers where PG&E is not currently able to serve their full load or generation AND where the distribution constraint is at the point in the network with an available SCADA device to send real-time telemetry (e.g. Substation Bank, Feeder Head, or other available SCADA device). Flex Connect is not available to customers where the distribution grid constraint is at a conductor or other network point without a SCADA device.

Load Limit Letters are not in a quarriable format, PG&E has identified this as a future process enhancement project.

- 8a- For R15/R16 tariffs, the time the project was delayed due to customer requested change in design or change in project scope: Per item 6a above, A direct option for a customer requested scope/design change has been built out as part of a Salesforce tool enhancement but is not currently being fully utilized by job owners and representatives. This data enhancement is pending an additional training rollout to PG&E staff involved in new business project management.
- 9a- Project Costs (\$\$\$) for all IOU equipment for upstream capacity projects: Electric Rule 15, Electric Rule 16, and Electric Rule 29/45: PG&E cannot report on this item at the individual customer level. Additionally, direct and indirect physical equipment assets associated with upstream capacity work are difficult to identify and require additional exploration internally. PG&E also needs to clarify the recommended definition of "equipment for upstream capacity projects" to ensure we're capturing the correct cost elements.
- 10a- R15/R16/R29 Energization Reasoning as to why exceeded average/maximum Energization Target: Future enhancements will include more specific reason code tracking to be deployed as part of a Salesforce enhancement to allow for better reason identification by the PG&E job representatives. It is likely not practical on PG&E's scale to identify reasons for every job exceeding the average recommended number of days. PG&E will begin a process improvement project to capture reasoning for exceeding the maximum energization timeline based on project specific challenges.
- **11a- Location of project exceeding the maximum energization target:** PG&E was unable to obtain circuit level data for this initial report. We are working internally to identify circuit level tracking information that extends beyond the municipal level to capture circuit specific information associated with each job.
- **12a- IOU reason for rejection of application:** Application cancellation reason is recordable in PG&E's primary reference system for job management. While this field is available it's not frequently utilized by job representatives at the time of application closure. We plan to retrain job representatives to properly utilize the cancellation reason selection option when closing applications.

- **13a- Amount of load (kW) provided to applicant using flexible service options:** Pending internal data improvement initiative. PG&E plans to be able to provide results related to flexible service option loads for the next reporting cycle.
- **14a- Time for identifying need for R15/16/29/45 upgrade:** Necessary SAP task completion data is incomplete for determining need for upgrades under Rule 15, Rule 16, Rule 29, or Rule 45. PG&E is working on a future process enhancement to ensure capture of all required date data.

# **C. Additional Reporting Disclaimers**

- Disadvantage Community (DAC), Tribal Community, and Underserved Communities: PG&E has valid geographic information for 95% of all applications completed since January 31, 2024, this represents a statistically valid sample of the overall population of new applications within the required reporting period.
  - Underserved Community Definition: 1) Census tracts with median household incomes at or below 80 percent of the statewide median income; or 2) with a median household income at or below the threshold designated as low income by the Department of Housing and Community Development's list of state income limits adopted under Healthy and Safety Code Section 50093.
- **Costs at Time of Energization:** As required PG&E has provided costs incurred at the time of energization, it's important to clarify that these costs do not fully capture the true costs associated with a completed new business project. It's critical to note that additional costs and internal accounting typically occur after the conclusion of the energization process per final meter set. These costs could include worksite restoration, contracted labor expenses, delayed billing for internal labor, equipment expenses, and others.

Because of internal accounting procedures there are also frequent occurrences where we may report a negative total value for job costs at time of energization. This occurs because payments by the customer to PG&E in the form of Contributions in Aid of Construction (CIAC) happen at project start. This creates a negative project balance that is reconciled over the entire project lifecycle. Because projects are often not fully reconciled at time of energization it's common to see negative project costs at the energization date.

### • Upstream Capacity Project Costs and Timelines:

PG&E has not maintained historical record of specific new business customers associated with upstream capacity projects. As referenced above under item 4a, PG&E has begun a data enhancement project for Distribution Upstream Capacity tracking. At this time, we can report on 95% of active upstream projects that were triggered by a new business order but cannot report on any historic upstream capacity work prior to March 2025. This has two impacts:

- Days reported in section 1D. Upstream Capacity Upgrades are based on time from initiation to completion of upstream capacity upgrade projects completed in 2023-2024. PG&E acknowledges that, according to Decision 24-09-020, the large electric investor-owned utilities (IOUs) are required to track the time needed to complete such projects. PG&E is unable to include this timing in the above metrics because, as noted in section 3C. Additional Reporting Disclaimers, PG&E does not have historical record of new business customers associated with upstream capacity projects.
- Upstream capacity upgrade costs for completed projects cannot be associated with specific new business customers at this time.
- Total Staffing, Labor, and Material Cost: SB 410 addresses the staffing needs
  of electrical corporations to ensure timely grid connections and energization of
  new facilities and housing developments. PG&E has begun to fill qualified staffing
  levels to ensure we have the necessary workforce to support these initiatives.
  However, PG&E is still working on creating the necessary accounting tools and
  reconciliation process to create a relationship between a specific new business
  order and accrued staffing costs. At this time PG&E can report on labor and
  material costs but does not differentiate staffing and labor expenses.
- **Customer Allowances:** PG&E customers may be eligible for allowances related to new electrical utility construction set forth by CPUC regulations. Eligible customers may select one of two options: a 10-year fully refundable option or a 50% upfront discount option. Additionally, starting January 1, 2025, all new

construction projects will use actual cost billing for electric line extensions, rather than estimated cost billing.

As part of California's broader effort to reduce greenhouse gas emissions and promote building decarbonization, new regulations by the CPUC, effective July 1, 2024, projects that use both electricity and natural gas will no longer receive financial allowances for extending electric lines. This change aims to encourage the adoption of all-electric buildings, which are more environmentally friendly and support California's clean energy future. However, all-electric new construction projects will continue to receive electric line extension subsidies.

• Customer Site Readiness and IOU Site Readiness Data: PG&E's current system of record did not track all the required fields necessary for energization timeline compliance. Because of this identified data gap PG&E has invested in a new system to comply with CPUC reporting requirements. PG&E is in the process of developing and launching a new Salesforce tool for internal use that will better address several missing data pieces. This new Salesforce extension will allow PG&E to measure the time between an initial inspection request and the 1st actual inspection date which will satisfy the need to track Utility Site Readiness and better position us in tracking Customer Site Readiness. Salesforce inspection date data is currently only available for a subset of jobs, but this dataset will continue to expand over time.

For the purposes of this initial report PG&E has provided the available elapsed time data for the Utility Site Readiness phase. We recognize that this is a largely incomplete dataset only capturing inspection date data on roughly 0.2% of complete jobs. As we continue to develop and implement this Salesforce enhancement, we will be able to provide more robust tracking of the Utility Site Readiness phase. This additional tracking will result in increases to the amount of PG&E controlled time across all projects.

**Meter Set Data:** For the purposes of this initial report PG&E has provided the available elapsed time data for the Service Energization phase. We recognize that this is an incomplete dataset only capturing Service Energization dates on 3,339 jobs, or 37% of completed work. As we continue to review and refine our available internal meter set data, we plan to be able to provide more robust

tracking of the Service Energization phase. For projects where a meter set date was not retrievable, we have substituted the construction complete date to signal project completion. Future enhancements to this data may result in an increase to total PG&E responsible time by an estimated 10 days based on current averages.

Additional Job Category "Relocation/Rearrangement/Upgrade": We have included an additional job category within our report that is unique to PG&E. Due to the scope of work completed under this grouping we did not want to exclude this category from the completed report. PG&E is working to refine this category and potentially include it as a subset of the standard IOU groupings for future reporting.

**Main Panel Upgrade (MPU) Projects:** MPU projects are reported separately from the standard tariff projects because they do not follow the typical energization process from intake to meter set via a PG&E order. At this time PG&E captures these projects under annual blanket orders and as such cannot provide detailed energization timelines. Additionally, these orders may include other work in support of an MPU, for example: weather heads, new meters, or relocation. PG&E's MPU reporting does not include the vast majority of the required reportable fields due to the internal order and notification structure we use to track Main Panel projects. The timelines reported represent total PG&E calendar days without detailed accounting of customer time. We expect that future reporting will include more robust and accurate timelines with detailed phase information for both Customer, PG&E, and when applicable, Agency time.

**Applicant Based Designs:** The design and engineering phase is considered IOU responsible time and therefore is accounted for as PG&E calendar days within our reporting. In instances where the job applicant elects to use a 3<sup>rd</sup> party designer for their project the total elapsed days are not within PG&E's ability to control. Moving forward in order to exercise additional control over applicant designed projects PG&E is considering a policy to cancel jobs that take an unreasonable amount of time in the applicant design phase.

## **D. Outlier Data and Special Considerations**

PG&E is committed to providing transparent reporting on the removal of any outlier data and the reasoning for their exclusion. This ensures the integrity and accuracy of our data analysis and reporting processes.

- **Criteria for Identifying Outliers:** Outliers are identified based on statistical analysis and domain-specific knowledge. Factors such as data entry errors, measurement anomalies, and extreme deviations from typical values are considered.
- **Reasoning for Exclusion:** Each outlier removed from the dataset is documented with a clear explanation. Common reasons include data entry errors, non-representative samples, and values that significantly skew the analysis.
- **Reporting Process:** Detailed reports on outlier removal are included in our biannual submissions to the Commission. These reports outline the criteria used, the number of outliers removed, and the impact on the overall analysis.

**Residential EV Upgrades:** Residential electric vehicle upgrades are captured under maintenance activity types 161 and 162 at PG&E. Because the typical energization process from Intake through Energization does not take place for the vast majority of these projects we have excluded them from this report. Most EV upgrade projects only encounter the Design phase and are considered complete once a design review has been completed.

**Customer Site Readiness:** In instances where negative day aging occurs within the site readiness phase PG&E has removed those data points to avoid skewing averages. Negative aging within the site readiness phase could occur due to data entry errors or other anomalies within the job process.

**Complete Jobs Without Task Data:** PG&E has identified and excluded a subset of jobs from our reporting and analysis processes. These jobs, although marked as complete in our system, lack meaningful task-specific data necessary for accurate and comprehensive evaluation. To ensure data quality standards, we have deliberately excluded these jobs, which account for 69 total jobs or less than 1 percent of the reportable population.

**Streetlights:** Streetlights are categorized under Maintenance Activity Type 16O at PG&E. Per a joint agreement with the other Investor-Owned Utilities (IOUs) in California, work involving streetlights has been excluded from this report.

**Rule 13:** Rule 13 jobs have been excluded due to their classification as temporary service work.

**Rule 20:** Government entity requested work (20a) has been excluded from the report as it's primarily classified under internal orders.

**Commercial Classification:** PG&E's commercial business classification includes the following groups:

- Commercial Projects
- Mixed Residential & Commercial Projects
- Industrial Projects

# 4. Data & Reporting Insights

## A. Future Enhancements Overview

PG&E is committed to continuous improvement and transparency in our energization processes. Below are notes on the data collected and future enhancements we plan to implement:

- Data Collection Methods: PG&E utilizes advanced data analytics and tracking systems to monitor energization timelines and identify bottlenecks. This data is collected from various sources, including customer feedback, internal process metrics, and external audits.
- Future Enhancements:
  - Enhanced Data Analytics: We plan to invest in more sophisticated data analytics tools and systems to better predict and manage energization timelines.
  - Process Automation: Implementing automation in key areas of the energization process to reduce manual intervention and improve efficiency.

- Customer Portal Upgrades: Enhancing our customer portal to provide realtime updates and more detailed information about the status of energization requests.
- Training Programs: Developing comprehensive training programs for our staff to ensure they are equipped with the latest knowledge and skills to handle energization tasks efficiently.
- Stakeholder Engagement: Increasing engagement with stakeholders, including customers, regulators, and community groups, to gather feedback and make informed improvements.

PG&E has publicly announced several enhancements to our construction and new business processes, as well as flexible connection options, to better serve our customers:

- Increased New-Service Connections: PG&E achieved a record of over 1,700 new-service connections in October 2024, a 70% increase compared to earlier months.
- Additional Funding: PG&E received approval to invest up to \$2.3 billion in additional funding through 2026 to add electric capacity and energize new projects.
- Flexible Connections: PG&E has implemented flexible connection options to accommodate various customer needs and timelines.
- **Process Improvements:** The Service Planning & Design team has reduced waiting times between process steps and improved overall efficiency.
- **Customer Feedback Integration:** PG&E has tested new ideas based on customer feedback to enhance the new-service connection experience.

# **B.** Identification of Constraints and Deployment Obstacles

PG&E has identified several constraints that impact the deployment of infrastructure, which we are actively working to address:

• Materials Availability: Supply chain disruptions have affected the availability of some critical materials, leading to delays in project timelines.

- Staffing Challenges: There is a shortage of qualified personnel to handle the increased demand for infrastructure projects, necessitating enhanced recruitment and training efforts.
- Permitting Delays: Obtaining necessary permits from local, state, and federal authorities can be time-consuming, impacting project schedules.
- Upstream Distribution Capacity Upgrades (DCU): The need for upstream DCU to support new connections can introduce additional complexity and delay in the energization process.
- IT and Systems: Current tracking and reporting systems will require additional investment and upgrades in order to capture remaining reportable fields. Our primary systems of record (SAP and Salesforce) are pending enhancement projects to ensure capture and accurate tracking of each energization phase.

# 5. Conclusion

PG&E is committed to complying with the biannual reporting requirements and providing detailed data to the Commission. We will track and report the necessary information to demonstrate our progress and identify areas for improvement. PG&E is dedicated to working collaboratively with the CPUC to achieve the goals outlined in D.24-09-020 and we are confident that our ongoing efforts will lead to improved energization timelines and enhanced customer satisfaction.