

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



FILED

10/22/25

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A2503015

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
REPLY COMMENTS**

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October 22, 2025

I. Introduction and Summary

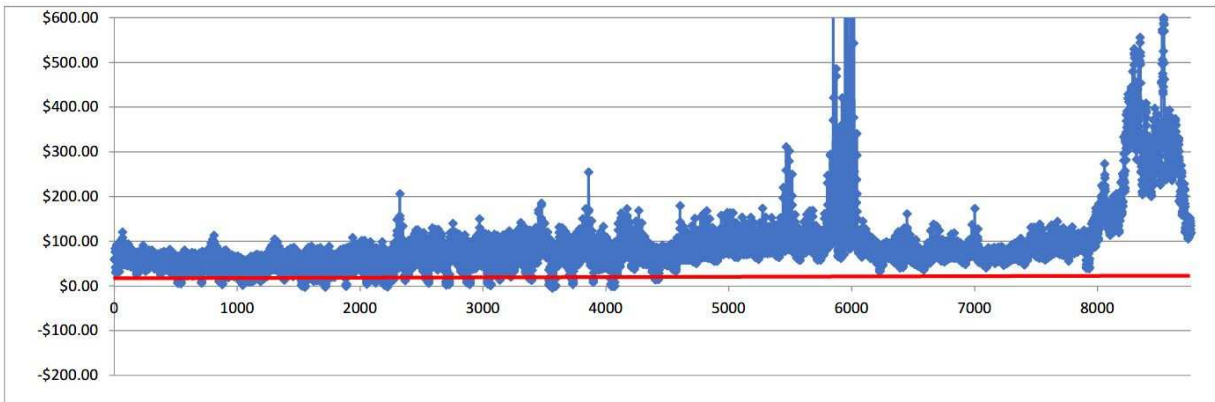
Californians for Green Nuclear Power, Inc's. (CGNP's) supports the perspective that the extended operations of Diablo Canyon Power Plant (DCPP) are extremely cost-effective. CGNP's October 20, 2025 Comments established that based on PG&E's Fall Update, the 2026 DCPP revenue requirement was projected to be \$382.962 million. CGNP calculated DCPP's 2026 cost to be **\$21.28** per MWh.

On October 2, 2025, PG&E emailed to CGNP the public NP 15 (North of Path 15, an east-west line that bisects the state) historical data for the period from January 1, 2022 through December 31, 2025 in a 1.9 MB Excel spreadsheet. This spreadsheet is apparently not included in the public version of PG&E's workpapers for its October 8, 2025. Interested parties may make an email request for a copy of PG&E's public spreadsheet from CGNP.

A. Relative to Recent NP 15 Historical Costs, DCPP's 2026 Power Cost is Very Economical

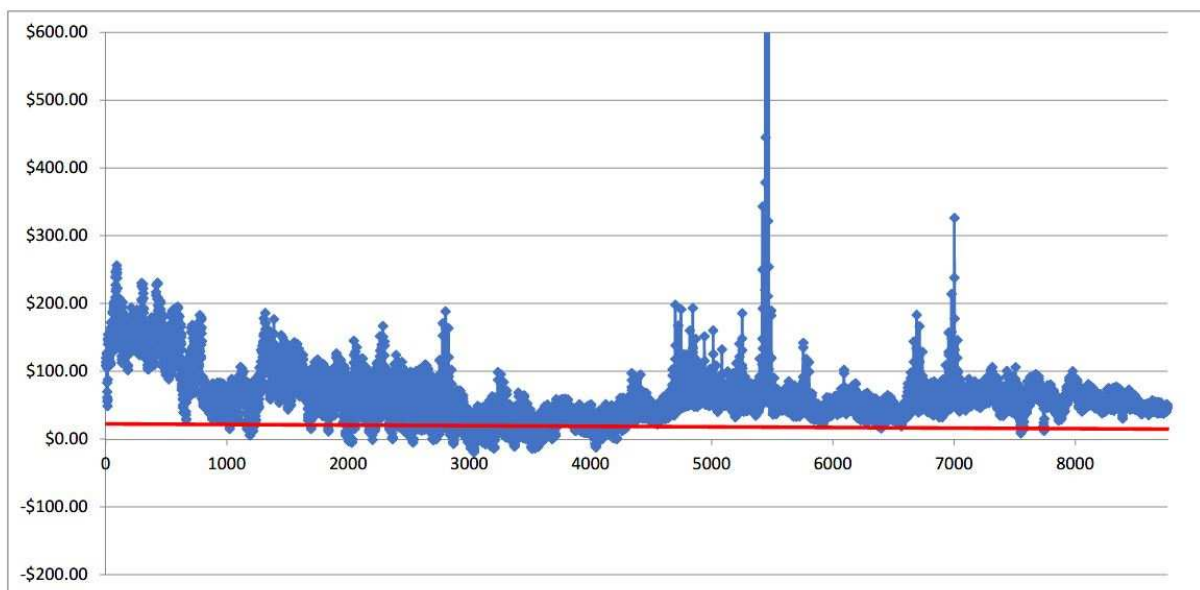
To summarize the NP 15 historical 2022-2024 LMP (locational marginal price) cost data, it is presented graphically below. In order to facilitate comparisons, the outlier price spikes are truncated to \$600.00 per MWh. Red horizontal lines approximating the \$21.28 / MWh 2026 projected DCPP cost are shown on each graph.

2022 Scaled NP 15 Hourly LMPs



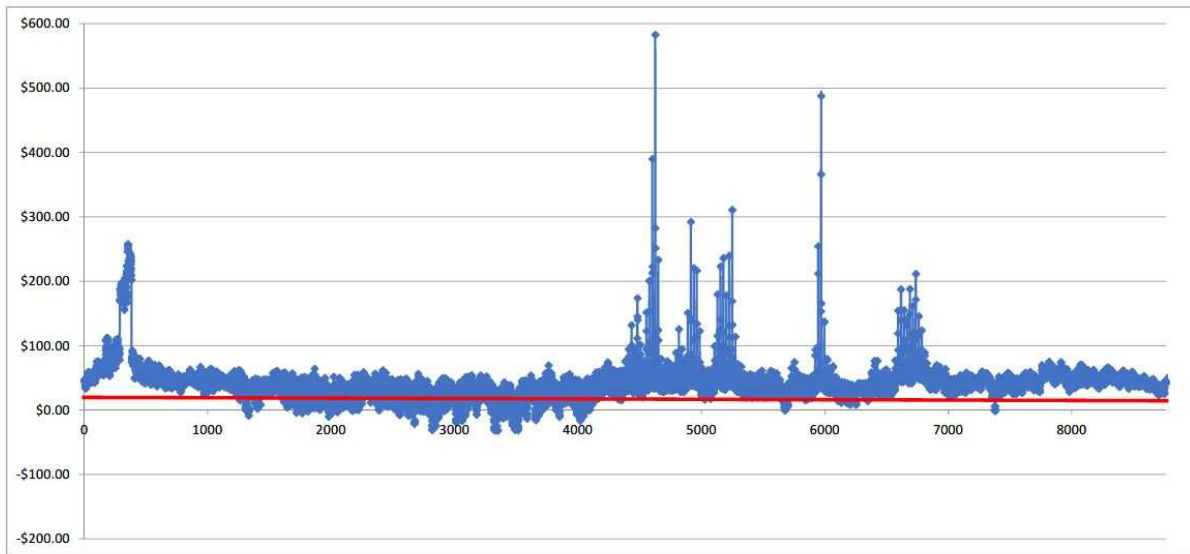
The horizontal axis is hours from the beginning of the year. There are 8,766 hours in a typical year. The August-September 2022 heat storm caused significant cost increases. The effect of the natural gas supply delivery constraints began near the end of the year. As the following graph shows, the cost increases persisted well into 2023.

2023 Scaled NP 15 Hourly LMPs



There were additional summer NP 15 cost increases.

2024 Scaled NP 15 Hourly LMPs



There were elevated costs early in 2024, with several periods of increased costs during the summer and early fall.

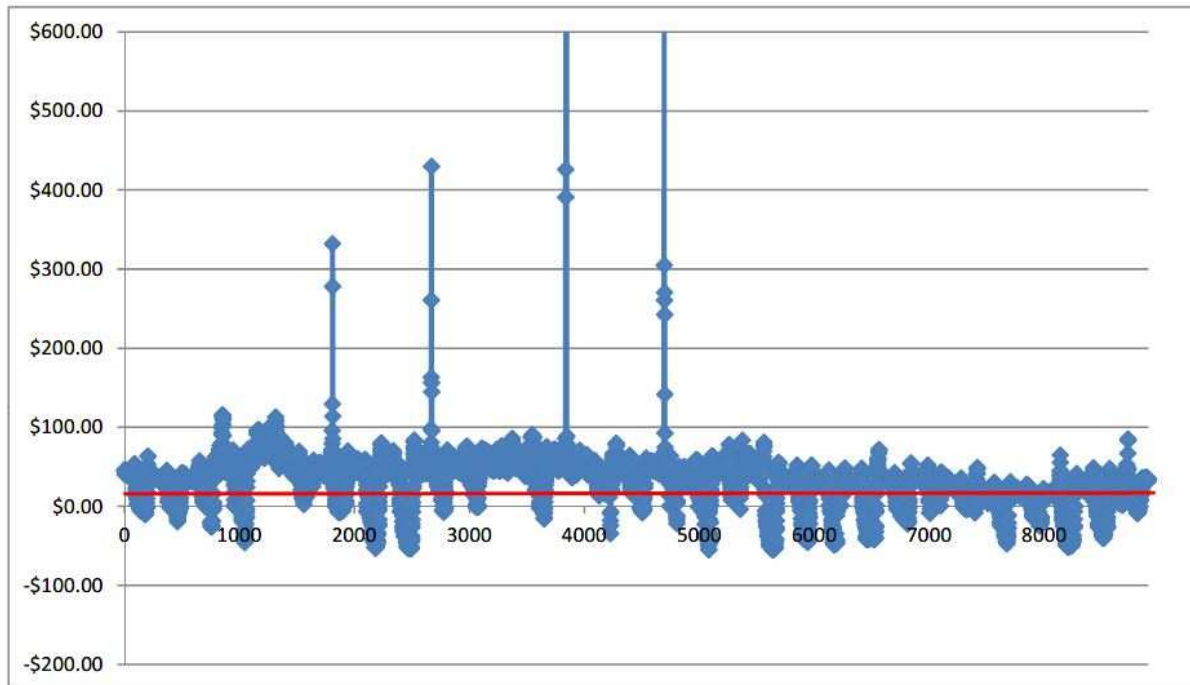
To investigate these trends further, CGNP downloaded monthly 2024-2025 5-minute NP 15 LMPs from CAISO's OASIS website.

To the left is a summary chart of monthly peak NP 15 LMPs from January, 2024 through September, 2025.

CAISO NP 15 Monthly Maxima		
LMP (\$/MWh)	Date	Hour
\$1,399.03	1/15/2024	10
\$440.12	2/6/2024	9
\$926.33	3/29/2024	9
\$233.77	4/24/2024	9
\$985.58	5/27/2024	20
\$160.04	6/23/2024	20
\$1,040.70	7/23/2024	20
\$120.63	8/2/2024	15
\$100.34	9/3/2024	19
\$1,236.58	10/7/2024	20
\$149.22	11/14/2024	7
\$1,016.60	12/12/2024	8
\$981.60	1/22/2025	7
\$257.66	2/3/2025	19
\$1,096.48	3/14/2025	10
\$1,240.46	4/25/2025	11
\$159.59	5/1/2025	19
\$126.37	6/9/2025	20
\$124.06	7/13/2025	21
\$111.93	8/10/2025	19
\$416.23	9/2/2025	20

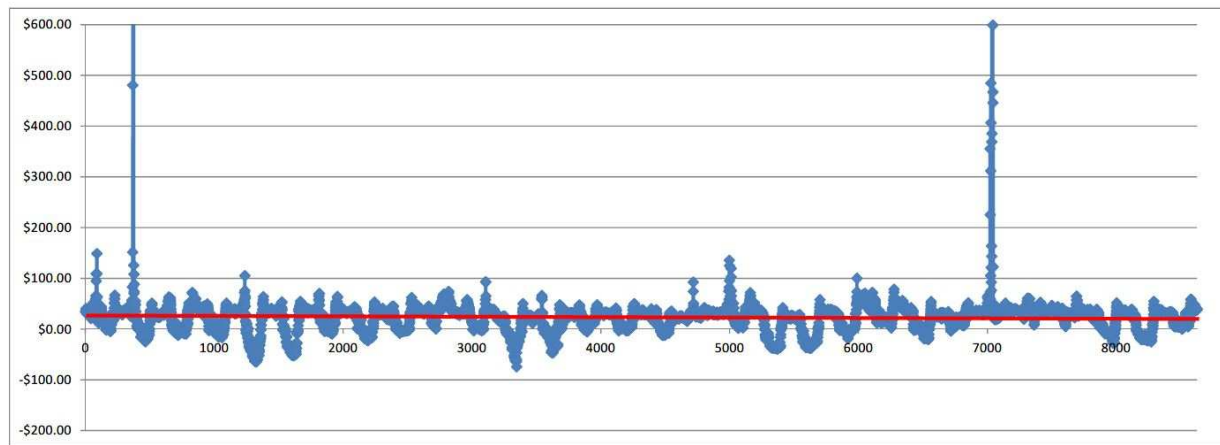
Here are the graphs for March and April 2025:

March, 2025 Scaled NP 15 Five Minute LMPs



There were some electricity supply constraints that drove up costs in early March, 2025.

April, 2025 Scaled NP 15 Five Minute LMPs



II. Discussion

California is distinguished by typically having the highest electricity costs in the continental U.S. The previous section showed the cost-effectiveness of DCP, particularly during extended operations when the plant is essentially fully depreciated. Deep-pocketed special interests have repeatedly attempted to shut down DCP. CGNP believes the primary motivation for those special interests is to further drive up costs for California electricity, since the demand for electricity is essentially inelastic (i.e. not sensitive to cost.) Many of those special interests have collectively expended millions of dollars in directly lobbying the CPUC during the past quarter of a century for schemes that have driven up the cost of electricity such as installing huge quantities of unreliable solar, wind, and batteries and reducing the supply of dispatchable electric generation from coal, natural gas, and nuclear power in California. Despite attempts to correct these structural problems via a 2015 package of CPUC reforms that unanimously passed the California Assembly and California Senate,

then-Governor Brown scuttled the reforms. Californians continue to pay the price. Despite many roadblocks developed by the CPUC since 2017, CGNP has been a persistent advocate for DCPD extended operations.

III. Conclusion

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

Dated: October 22, 2025

Respectfully submitted,

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

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