STATE OF CALIFORNIA GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

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**Agenda ID #23998**
**Ratesetting**

TO PARTIES OF RECORD IN APPLICATION 24-05-008:

This is the proposed decision of Administrative Law Judge Peter Wercinski. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's March 19, 2026, Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties of record may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.

The Commission may hold a Ratesetting Deliberative Meeting to consider this item in closed session in advance of the Business Meeting at which the item will be heard. In such event, notice of the Ratesetting Deliberative Meeting will appear in the Daily Calendar, which is posted on the Commission's website. If a Ratesetting Deliberative Meeting is scheduled, *ex parte* communications are prohibited pursuant to Rule 8.2(c)(4).

/s/ MICHELLE COOKE

Michelle Cooke
Chief Administrative Law Judge

MLC:hma
Attachment

ALJ/PWI/hma **PROPOSED DECISION** **Agenda ID #23998**
**Ratesetting**

Decision **PROPOSED DECISION OF ALJ WERCINSKI (Mailed 1/30/2026)**

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

| | |
|---|---|
| Application of Pacific Gas and Electric Company to Submit Its 2024 Risk Assessment and Mitigation Phase Report. | Application 24-05-008 |

# DECISION CLOSING RISK ASSESSMENT AND MITIGATION PHASE PROCEEDING

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## Summary

This decision closes Pacific Gas and Electric Company's (PG&E) 2024 Risk Assessment and Mitigation Phase (RAMP) proceeding, the initial phase of PG&E's 2027 Test Year General Rate Case (GRC) process for which it filed its GRC Application 25-05-009 on May 15, 2025. PG&E's RAMP Report (PG&E RAMP Report) filed with its application in this proceeding contains PG&E's detailed assessment of its top safety risks, risk mitigation programs and projects and the associated expenditures to address those risks for the 2027 to 2030 GRC period. The PG&E RAMP Report employs a new cost-benefit approach that permits a more logically sound "apples-to-apples" comparison of mitigation options than the now-superseded risk-spend efficiency approach used in previous RAMP applications.

The Commission's Safety Policy Division (SPD) prepared an SPD Report that found that the PG&E RAMP Report complies with Commission requirements and that no areas of deficiency are severe enough to warrant SPD's recommendation that the Commission reject the RAMP application. However, the SPD Report noted deficiencies and areas of concern with the PG&E Ramp Report. An April 2025 Administrative Law Judge ruling directed PG&E to serve additional information and comply with specified requirements to address four areas of deficiency in PG&E's RAMP application. In June 2025, PG&E served full responses to that ruling in this proceeding and in the GRC.

This proceeding is closed because there has been full compliance with all Commission RAMP-related decisions, and any additional matters related to the issues in scope in this proceeding can be addressed in PG&E's current GRC proceeding.

# 1. Background

## 1.1. Risk-Based Decision-Making Background

In recent years, the Commission has addressed risk-based decision-making frameworks (RDFs) for electric and gas utilities, including Pacific Gas and Electric Company (PG&E), in consolidated Application (A.) 15-05-002 *et al. (*the Safety Model Assessment Phase (S-MAP) Proceeding) that resulted in the Commission adoption of a settlement agreement in Decision (D.) 18-12-014 (S-MAP Decision), and the Order Instituting Rulemaking (R.) 20-07-013 (RDF Proceeding) that resulted in the Phase I decision D.21-11-009 (Phase I RDF Decision) and the Phase II decision D.22-12-027 (Phase II RDF Decision). A new cost-benefit approach was adopted in the Phase II RDF Decision that governs the risk evaluation framework applicable to this 2024 Risk Assessment and Mitigation Phase (RAMP) proceeding filed by PG&E. The Phase II RDF Decision superseded the S-MAP Decision that governed PG&E's 2020 RAMP application A.20-06-012. Central to the Phase II RDF Decision's cost-benefit approach is the monetization of the Safety and Reliability attributes of risk, enabling a cost-benefit ratio to be calculated for each risk mitigation program.

## 1.2. Procedural Background

On May 15, 2024, PG&E filed its RAMP Report (PG&E RAMP Report) and associated application A.24-05-008 (Application) pursuant to the procedures set forth in D.20-01-002.[1] In its Application, PG&E requested that the Commission (1) direct the Safety Policy Division (SPD) to review and report upon the contents of the PG&E RAMP Report, and (2) close this proceeding subsequent to PG&E's

[1] D.20-01-002 at 48-49.

incorporation of SPD's evaluation into its 2027 test year (TY) general rate case (GRC) proceeding.

On June 14, 2024, Small Business Utility Advocates (SBUA) and The Utility Reform Network (TURN) filed responses to the Application.

On June 24, 2024, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) filed a protest to the Application.

On June 27, 2024, PG&E filed a reply to the responses and protest to the Application.

On July 15, 2024, Mussey Grade Road Alliance (MGRA) filed a motion for party status.

On July 17, 2024, PG&E filed a Joint Prehearing Conference Statement on behalf of Cal Advocates, SBUA, TURN, and MGRA.

On July 19, 2024, the assigned Administrative Law Judge (ALJ) conducted a prehearing conference (PHC) that addressed the issues of law and fact, need for hearing, and schedule for resolving the matter. At the PHC, the assigned ALJ granted MGRA's July 15, 2024, motion for party status and granted the oral motion for party status of Energy Producers and Users Coalition and Indicated Shippers (EPUC/Indicated Shippers).

On August 8, 2024, Assigned Commissioner John Reynolds issued a Scoping Memo and Ruling (Scoping Memo) setting forth the issues and an initial schedule of the proceeding. The Scoping Memo identified the following issues to be determined or otherwise considered:

1. Whether PG&E's RAMP filing is complete and in compliance with RAMP-related and governing decisions, including D. 14-12-025, D.18-12-014, D.21-11-009 (the Phase I RDF Decision), and D.22-12-027 (the Phase II RDF Decision);

2. Whether PG&E adequately demonstrates how it uses its RAMP model and risk analysis in selection and implementation of specific mitigation projects and programs;
3. Whether there are gaps in the PG&E RAMP Report in identifying enterprise-level risks and considering mitigation options including but not limited to:
    a. Whether PG&E has adequately modelled the risks and mitigations for Public Safety Power Shutoffs (PSPS) and Enhanced Powerline Safety Settings (EPSS);
    b. Whether PG&E adequately demonstrates how it accounts for lifecycle costs and benefits when assessing risk mitigation programs and projects, including depreciation costs and negative net salvage costs;
    c. Whether PG&E has reasonably implemented the Cost Benefit Approach directed by D.22-12-027;
    d. Whether PG&E demonstrated the reasonableness of its Risk Scaling Function;
    e. Whether PG&E has complied with the RAMP graphical progress reporting requirements of D.22-10-002;
    f. Whether PG&E has adequately assessed operational performance in its quantitative risk analysis;
    g. Whether PG&E has proposed reasonable alternative mitigations;
    h. Whether wildfire mitigation risk reduction effectiveness values, reliability improvement, and costs are adequately reflected and reasonable;
    i. Whether PG&E has adequately explained its proposed mitigation plans; and
    j. Whether PG&E's risk-event tranches are appropriately granular;
4. Whether PG&E's analysis is transparent and allows for independent validation of its results;

5. Whether RAMP feedback has been meaningfully evaluated, and when appropriate, incorporated into PG&E's GRC filing;
6. Whether PG&E has reasonably implemented the Environmental and Social Justice Pilot study and other related direction ordered in D.22-12-027; and
7. Whether the Application aligns with or impacts the achievement of any of the nine goals of the Commission's Environmental and Social Justice (ESJ) Action Plan.

On December 2, 2024, the SPD Report that evaluated the PG&E RAMP Report was entered into the evidentiary record in this proceeding.

On December 6, 2024, PG&E filed opening comments to the SPD Report and MGRA, TURN, Cal Advocates, EPUC/Indicated Shippers, and SBUA filed opening comments to the PG&E RAMP Report and the SPD Report.

On December 17, 2024, PG&E filed reply comments to the SPD Report and MGRA, TURN, and SBUA filed reply comments to the PG&E RAMP Report.

On April 22, 2025, the assigned ALJ issued a ruling (April 2025 Ruling) directing PG&E to serve additional information and comply with other requirements related to the PG&E RAMP Report and PG&E's 2027 GRC application by June 20, 2025.

On May 15, 2025, PG&E filed its TY 2027 GRC Application A.25-05-009.

On June 20, 2025, PG&E submitted its response to the April 2025 Ruling (PG&E Response to April 2025 Ruling).

On October 9, 2025, the assigned ALJ issued a ruling regarding motions for the admission of documents into the evidentiary record and comments regarding remaining issues and closing the proceeding (October 2025 Ruling).

On October 24, 2025, PG&E and Cal Advocates each filed opening comments in response to the October 2025 Ruling and motions for the admission of documents into the evidentiary record. On November 3, 2025, PG&E filed a response to Cal Advocates' motion for the admission of documents into the evidentiary record and reply comments in response to the October 2025 Ruling.

On December 1, 2025, the assigned ALJ (1) issued a ruling admitting into the evidentiary record Exhibits PG&E-1, PG&E-2, PG&E-3, PG&E-4, PG&E-4C, PG&E-5, PG&E-5C, PG&E-7, PG&E-8, PG&E-9, and PG&E-10 requested for admission by PG&E that includes the PG&E RAMP Report, supporting workpapers, and errata, and (2) issued a ruling admitting into the evidentiary record Exhibit CA-2 requested for admission by Cal Advocates that includes parties' comments regarding RAMP (December 2025 Rulings).

### 1.3. Submission Date

This proceeding is deemed submitted on December 1, 2025, upon the issuance of the December 2025 Rulings.

## 2. PG&E RAMP Report

The PG&E RAMP Report provides a quantitative assessment of PG&E's top 12 safety risks, describes preliminary mitigation plans, and estimates the costs and benefits associated with mitigating those risks.[2] PG&E identifies the following as its top 12 safety risks: (1) Wildfire with PSPS and EPSS; (2) Loss of Containment on Gas Transmission Pipeline; (3) Public Contact with Intact Energized Electrical Equipment; (4) Failure of Electric Distribution Overhead Assets; (5) Electric Transmission Systemwide Blackout; (6) Contractor Safety Incident; (7) Employee Safety Incident; (8) Cybersecurity Risk Event; (9) Large Uncontrolled Water Release (Dam Failure); (10) Failure of Electric Distribution Underground Assets; (11) Loss of Containment on Gas Distribution Main or

[2] Application at 1.

Service; and (12) Large Overpressure Event Downstream of Gas Measurement and Control Facility.[3] The PG&E RAMP Report includes chapters addressing PG&E's Enterprise Risk Management Framework, Risk Modeling and the Cost-Benefit Ratio, Cross-Cutting Factors, RAMP Risk Selection, Safety Culture, Policy, and Compensation, Climate Resilience, and PG&E's Environmental and Social Justice Pilot Study Implementation, and a separate chapter for each of PG&E's 12 safety risks.[4]

## 3. SPD Report

### 3.1. Introduction

The SPD Report identifies deficiencies, areas of concern, and recommendations for improvement in the PG&E RAMP Report. The SPD Report concludes:

> In general, the PG&E 2024 RAMP complies with the requirements of the Phase 2 RDF. No areas of deficiency are severe enough to warrant SPD's recommendation that the Commission reject this RAMP application. However, SPD noted numerous less significant deficiencies and areas of concern in each risk chapter. SPD pointed out these deficiencies and areas of concern and made recommendations to PG&E for improvement. SPD recommends that PG&E correct these deficiencies before filing its Test Year 2027 GRC.[5]

The SPD Report contains 12 Evaluation of Risk chapters that evaluate the top 12 safety risks identified in the PG&E RAMP Report. As discussed below, the SPD Report also addresses (1) Key Differences between PG&E's 2020 RAMP and 2024 RAMP, (2) PG&E's RAMP Risk Selection Process, (3) Global Observations,

[3] Exhibit PG&E-1, Table 1-1 at 1-11.

[4] Exhibits PG&E-2, PG&E-3, PG&E-4, PG&E-5, and PG&E-7.

[5] SPD Report at 2.

(4) Electric Reliability Cost, (5) Safety Culture, Policy and Compensation, (6) Climate Resilience, and (7) Environmental and Social Justice Pilot Study and Implementation.

### 3.2. Key Differences between PG&E's 2020 RAMP and 2024 RAMP

The SPD Report lists the following seven key differences between PG&E's 2020 RAMP and 2024 RAMP:[6]

1. The safety, reliability, and financial attributes in the risk calculation in the 2024 RAMP are expressed in dollar values. In the 2020 RAMP, these attribute values were expressed as a unitless percentage of each attribute's estimated maximum value.
2. Citing guidance from D.14-12-025 to account for the safety impact caused by reliability-induced issues, PG&E introduced a new sub-attribute under the safety attribute: (Reliability-induced) Indirect Safety.
3. PG&E uses a California-adjusted Value of Statistical Life (VSL) of $15.2 million to evaluate the safety attribute and indirect safety sub-attribute. In the 2020 RAMP, PG&E's Multi-Attribute Value Function had an implied VSL of $100 million. Consequently, the importance of the safety attribute decreased significantly relative to the reliability and financial attributes, resulting in a dramatic impact on the relative rankings of some RAMP risks between the 2020 RAMP and the 2024 RAMP.
4. In accordance with D.22-12-027, PG&E developed and included in its 2024 RAMP application an ESJ Pilot Study Plan.
5. In the PG&E 2024 RAMP, PG&E used a risk-averse scaling function explicitly based on the implied risk premiums of insurance products and catastrophe bonds PG&E purchased to cede risks to the insurance companies and the

[6] SPD Report at 9-11.

financial market. In the 2020 RAMP, PG&E specified a risk-averse scaling function without referencing any risk premiums implied by insurance products.

6. When calculating cost-benefit ratios, the allocated costs of relevant foundational activities are combined with the cost of an enabled mitigation program to arrive at the total cost for each mitigation program. Foundational activities are initiatives that support or enable two or more mitigation programs but do not directly reduce the consequences or reduce the likelihood of safety risk events. This is a new requirement in the Phase I RDF Decision. The impetus for this new requirement is to give a more realistic representation of the mitigation program costs.
7. In the 2020 RAMP, PG&E defined a serious injury as equivalent to 0.25 of a fatality. In the 2024 RAMP, PG&E used the Maximum Abbreviated Injury Scale-based injury severity level adopted by the U.S. Department of Transportation (DOT) for the value of injury prevention.

### 3.3. PG&E's RAMP Risk Selection Process

The SPD Report states that the risk selection process used by PG&E to arrive at the 2024 RAMP risks is essentially identical to the process used in the 2020 RAMP and explains that the primary difference between the two reports is that the safety risk scores were converted into dollar values in the 2024 RAMP. Both RAMPs started with a list of enterprise-level risks from PG&E's Corporate Risk Register.[7]

### 3.4. Global Observations

The SPD Report provides the following Global Observations to the PG&E RAMP Report, identifying the more notable observations, concerns, or deficiencies affecting the PG&E 2024 RAMP: [8]

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[7] SPD Report at 12.

[8] SPD Report at 13-16.

1. Effects of Monetizing Safety and Reliability Attributes: SPD states that the most significant difference between the 2024 RAMP and previous RAMPs is the monetization of the Safety and Reliability attributes of risk. SPD notes that one significant effect of monetizing the Safety attribute was to effectively place less emphasis on the Safety attribute relative to the Reliability and Financial attributes.
2. Risk-Averse Risk Scaling Function: SPD states that a notable feature of PG&E's 2024 RAMP is the use of a new risk-averse risk scaling function. SPD found that though PG&E's methodology to derive risk-averse risk-scaling factors was justified, it would also make sense for PG&E to present parallel RAMP analyses based on a risk-neutral, completely linear risk-scaling function which would allow the Commission, Commission staff, and other GRC stakeholders to gain insight into what effects the risk-averse scaling function used in this RAMP had on the risk evaluation, risk mitigation decisions, and expenditure levels. SPD recommends that PG&E submit a parallel set of risk analyses in its 2027 GRC filing using a risk-neutral scaling function, adding that, at a minimum, the parallel analyses should contain risk scores and cost benefit ratios of the proposed and alternative mitigations.
3. No Identification of Compliance Requirements: SPD states that throughout the RAMP, PG&E did not, as a general practice, identify mitigation programs (including those classified as controls) needed to comply with regulatory requirements, which often have very low cost-benefit ratios. SPD recommends that, for the TY 2027 GRC and future RAMP applications, PG&E should identify which mitigations and controls are needed to comply with regulatory requirements, and it should also identify the relevant regulatory requirement for each such mitigation and control.
4. Continued Funding of Controls with Low Cost-Benefit Ratio: SPD states that there is an apparent presumption by PG&E throughout its RAMP that mitigation programs approved in prior GRCs (and now classified as controls)

would be given an almost automatic green light for continued approval and funding in the TY 2027 GRC, which SPD found "particularly jarring for controls with a very low cost-benefit ratio."[9]

5. Alternatives Are Often Unrealistic Alternatives: SPD states that the alternative mitigations are often not realistic alternatives to the proposed mitigation plan, and that the primary proposed plan is often the preordained mitigation plan, with the alternatives having unacceptably low cost-benefit ratios to be realistic alternatives to the proposed plan.
6. Electric Reliability Cost: SPD had concerns with PG&E's method of estimating the dollar value of Reliability, which are discussed in the following section of this decision.

### 3.5. Electric Reliability Cost

PG&E utilized the Interruption Cost Estimate (ICE) calculator developed by the Lawrence Berkeley National Laboratory (LBNL) to estimate the monetized value of the electric Reliability attribute.[10]

The SPD Report makes the observation, confirmed by MGRA, that PG&E elected to use a single, system-wide average value for Reliability, stating that the problem with a system-wide average is that it incorporates the high costs of an outage to commercial and industrial customers despite large parts of PG&E's territory having few, if any, such customers. Rural parts of California where certain risks are more likely to occur, such as wildfire, have few commercial and industrial customers.[11]

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[9] SPD Report at 16.

[10] SPD Report at 17, pursuant to the requirement of D.22-12-027 Ordering Paragraph 2.

[11] SPD Report at 17.

### 3.6. Safety Culture, Policy, and Compensation

The SPD Report notes that R.21-10-001 to Develop Safety Culture Assessments for Electric and Natural Gas Utilities is an open rulemaking proceeding involving many interconnected elements in which both PG&E and SPD are active participants. Given this status, the SPD Report defers any specific observations or recommendations and instead describes each of the five program areas PG&E included in its RAMP Report, which are (1) Safety Management System, (2) Safety Culture, (3) Leadership, (4) Governance, and (5) Employee/Executive Compensation.[12]

### 3.7. Climate Resilience

The SPD Report explains that PG&E integrated Climate Adaptation and Vulnerability Assessment (CAVA) strategies into each risk chapter of the PG&E RAMP Report. Following the guidance in D.20-08-046, PG&E assessed its assets' vulnerability to climate change and adaptation capacity for each RAMP risk. PG&E's climate adaptation assessment study considered the 2030, 2050, and 2080 decadal time frames.

### 3.8. PG&E's Environmental and Social Justice Pilot Study Plan and Implementation

The SPD Report states that the purpose of PG&E's ESJ Pilot Study Plan "is to address the seven key action items directed in Decision (D.) 22-12-027 and provide insight into how PG&E's planned risk mitigations impact Disadvantaged and Vulnerable Communities (DVC) relative to environmental and social justice."[13] The SPD Report addresses PG&E's implementation of those seven action items, which are:

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[12] SPD Report at 21-22.

[13] SPD Report at 28.

1. Consider equity in the evaluation of consequences and risk mitigation within the RDF, using the most current version of CalEnviroScreen to better understand how risks may disproportionately impact some communities;
2. Consider investments in clean energy resources in the RDF as possible means to improve safety and reliability and mitigate risks in DVCs;
3. Consider mitigations that improve local air quality and public health in the RDF, including supporting data collection efforts associated with Assembly Bill 617 regarding community air protection programs;
4. Evaluate how the selection of proposed mitigations may impact climate resilience in DVCs;
5. Evaluate if the estimated impacts of wildfire smoke included in the RDF disproportionately impact DVCs;
6. Estimate the extent to which risk mitigation investments included in the RDF impact and benefit DVCs independently and in relation to non-DVCs in the IOU service territory; and
7. Enhance outreach and public participation opportunities for DVCs to meaningfully participate in risk mitigation and climate adaptation activities consistent with D.20-08-046.[14]

The SPD Report recommends that PG&E should do the following in its TY 2027 GRC:

1. Present both the natural units and the monetized value of risk in its RAMP narrative and workpapers related to an ESJ analysis of the Large Uncontrolled Water Release risk event;
2. Incorporate High Fire Risk Area (HFRA) and Non-HFRA subtotals into its overall risk assessment and explain why DVC communities face a disproportionate amount of wildfire risk in its 2027 GRC filing;

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[14] SPD Report at 29-39.

3. Update Tables 1-15, 1-16, 1-17, and 1-18 in the Wildfire chapter of the PG&E RAMP Report with appropriate subtotals to better reflect the analysis presented;
4. Provide an explanation why allocating PSPS and EPSS consequences proportionally to DVC customers within each tranche is an appropriately data-supported approach and how this approach is related to PG&E's estimation of the Reliability attribute via the ICE calculator.
5. Explain how the Microgrid Incentive Program and the Community Microgrid Enablement Program translate into improvements in Safety and Reliability for DVCs facing risk events presented in the 2024 RAMP;
6. Clearly explain why it and other Assembly Bill 617 stakeholders have yet to decide on mitigation for greenhouse gas emissions and local air pollutants;
7. Provide a clear quantitative analysis for how mitigations will impact climate resilience in DVCs;
8. Quantitatively clarify the relationship between mitigations presented in the 2027 GRC filing and climate resilience in DVCs in its upcoming Climate Pilot White Paper (due September 15, 2025, as ordered in D.24-05-064);
9. Adopt San Diego Gas & Electric Company's "acres burned" method as an interim proxy for estimating the impact of wildfire smoke on DVCs;
10. Include cost-benefit ratio calculations for all Loss of Containment on a Gas Transmission Pipeline, Large Uncontrolled Water Release, and wildfire mitigation programs in DVCs and Non-DVCs; and
11. Explain its short and long-term climate investment strategy and capital investment plan.[15]

[15] SPD Report at 40.

### 3.9. Party Comments on PG&E RAMP Report and SPD Report

The parties were given an opportunity to provide opening and reply comments on the PG&E RAMP Report and the SPD Report. These comments, which are described in the following sections of this decision, and PG&E's consideration of them in its TY 2027 GRC filing, form an integral part of the RAMP process.

#### 3.9.1. Cal Advocates Comments

Cal Advocates supports many of the recommendations in the SPD Report and presented additional recommendations. Cal Advocates states that PG&E (1) failed to provide a meaningful comparison of covered conductor against undergrounding as an alternative wildfire mitigation in its RAMP, (2) failed to provide an adequate justification for its decision to select a $6.5 billion undergrounding wildfire mitigation program over a $1.7 billion covered conductor alternative, and (3) failed to evaluate the risk from delayed mitigation of wildfire risks while undergrounding projects are underway, due to the lengthy period of time needed to implement undergrounding.[16]

Cal Advocates further states that PG&E should (1) include an analysis and forecast of ratepayer bill impacts when comparing alternative risk mitigation programs, (2) evaluate risks from incomplete safety, reliability, and maintenance work, (3) supplement the PG&E RAMP Report with adequate graphics of historical progress of its safety work, (4) evaluate the safety impacts of escalating rates on customers, and (5) not exclude its water conveyance system as a top RAMP risk.[17]

[16] Cal Advocates Opening Comments at 2-5.

[17] Cal Advocates Opening Comments at 6-8.

Regarding the lack of adequate historical safety work progress graphics, Cal Advocates states that PG&E "fails to meet the graphical progress reporting requirements imposed by D.22-10-002,"[18] and that while it provided information in graphics and tabular format that shows the progress that it made in completing the imputed work units described in its 2017 RAMP report and 2020 RAMP report, those "graphics are inadequate and do not show the actual progress of each mitigation or control program."[19]

Cal Advocates notes that, as stated in the SPD Report, PG&E did not meet the requirement in D.18-12-014 to provide two alternatives: "[I]nstead, only one of PG&E's Alternatives was presented as a clear alternative to a specific proposed mitigation. According to SPD, the 'other three alternatives were presented more as additional projects that PG&E is piloting or considering in the future.'"[20]

#### 3.9.2. EPUC/Indicated Shippers Comments

EPUC/Indicated Shippers states that the SPD Report overlooks several important inputs to PG&E's RAMP application that have potentially large impacts on the cost-benefit ratio and proposed mitigation measures. EPUC/Indicated Shippers' comments on the SPD Report include the following:

1. The SPD Report does not address the reasonableness of PG&E's cost estimates, finding it to be beyond the scope of the evaluation, but acknowledges that errors and uncertainties will influence cost-benefit ratio calculations and lead to potential errors in mitigation selection, leaving this cost verification to the TY 2027 GRC. Calling this "a

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[18] Cal Advocates Opening Comments at 7, citing SPD Report at 169.

[19] Cal Advocates Opening Comments at 7-8.

[20] Cal Advocates Opening Comments at 3, footnote 13, citing the SPD Report at 64, which cites D.18-12-014 at 34.

missed opportunity," EPUC/Indicated Shippers states that given that PG&E has proposed in its RAMP application many mitigation projects with cost-benefit ratios less than 1.0, it will likely propose spending billions of dollars on risk mitigation during the 2027-2030 GRC period;[21]

2. The SPD Report should have reported on the degree to which PG&E relied on qualitative subject matter expert opinion rather than objective field data when selecting mitigation measures for inclusion in its RAMP application. The SPD Report should assess how PG&E's subject matter expert input was developed and incorporated into the risk models, and notes that the interjection of subject matter expert opinion should be avoided when objective data is available;[22]
3. The SPD Report accepts PG&E's newly added "indirect safety impacts" variable of six Expected Fatalities per Billion Customer Minutes Interrupted and does not scrutinize this metric despite its outsized impact on some risk event consequence calculations. EPUC/Indicated Shippers states that given PG&E's use of a territory-wide electric reliability cost metric that erroneously assumes an equal distribution of residential, commercial, and industrial customers in all areas of PG&E's system, the SPD Report should have assessed the veracity of this metric; [23]
4. Neither PG&E's RAMP Report nor the SPD Report provides any ratepayer bill impacts, which is critical information for determining whether PG&E's resulting rates post-mitigation are just and reasonable. EPUC/Indicated Shippers states that even a rough-cut estimate of bill impacts may prove helpful to the Commission and stakeholders in determining the cost-benefit tradeoffs of various risk mitigations within the

[21] EPUC/Indicated Shippers Opening Comments at 5.

[22] EPUC/Indicated Shippers Opening Comments at 5.

[23] EPUC/Indicated Shippers Opening Comments at 5-6.

context of limited ratepayer funds and the necessity for rate affordability.[24] EPUC/Indicated Shippers further states that future SPD reports, and the subsequent GRC evaluations by the Commission and stakeholders, would benefit from inclusion of these additional assessments, which would provide increased transparency and the identification of major sources of uncertainty in estimating the likelihood and consequences of PG&E enterprise risk events, and would also inform rate affordability impacts;[25]

5. EPUC/Indicated Shippers states that while D.14-12-025 and D.18-12-014 both require PG&E to provide at least two alternative mitigations for each of its risk mitigation proposals, PG&E admits that its covered conductor program "is not considered part of the alternatives" and "there is no specific alternative associated with that program," and that its covered conductor and undergrounding are mutually exclusive risk mitigations. EPUC/Indicated Shippers believes PG&E should be required to supplement its RAMP, and all future RAMPs and GRCs, with a detailed comparison of the costs and benefits of covered conductor as an alternative to undergrounding;[26] and
6. EPUC/Indicated Shippers states that PSPS and EPSS are the most cost-effective wildfire risk mitigation measures and deserve deeper analysis and evaluation as alternatives to expensive undergrounding. EPUC/Indicated Shippers concludes that PG&E has much more work to do modeling the risk mitigation benefits and impacts for PSPS and EPSS as a touchstone for evaluating the cost-effectiveness of undergrounding, that PG&E risk modeling should be improved to include information on different risk

[24] EPUC/Indicated Shippers Opening Comments at 6-7.

[25] EPUC/Indicated Shippers Opening Comments at 7.

[26] EPUC/Indicated Shippers Opening Comments at 16.

mitigations, and that PG&E should present that data by circuit segment.[27]

#### 3.9.3. MGRA Comments

MGRA generally supports the SPD Report and its findings, but found two potentially serious mistakes in the SPD Report, as follows:

1. The SPD Report erroneously finds that PG&E's risk attitude model based on insurance products is valid, with MGRA stating that PG&E's RAMP presentation does not provide adequate support for its proposal and that there are numerous grounds to doubt its validity; and
2. The SPD Report accepts PG&E's covered conductor wildfire risk reduction efficiency of 65% net present value risk reduction, which MGRA asserts is a significant underestimate, particularly if covered conductor is paired with technologies that cover the downed conductor/tree fall-in failure case.[28]

#### 3.9.4. SBUA Comments

SBUA states it strongly supports SPD's recommendations as stated in the SPD Report and in each chapter,[29] but identifies several key areas of concern warranting particular attention. SBUA acknowledges that PG&E has made strides in improving its risk assessment methodology since the 2020 RAMP as reflected in the SPD Report, particularly in its more granular approach to tranching, adding that as discussed in the SPD Report, significant concerns and room for improvement remain.[30]

SBUA commented on the Global Observation Section of the SPD Report in three areas:

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[27] EPUC/Indicated Shippers Opening Comments at 8-11, 16-17.

[28] MGRA Opening Comments at 2-3.

[29] SBUA Opening Comments at 5.

[30] SBUA Opening Comments at 1.

1. Electric Reliability Cost: SBUA strongly supports SPD's recommendation to implement a disaggregated approach to estimate Reliability values, noting that without such disaggregation, small commercial customer classes (and possibly other rate classes) may unfairly subsidize other rate classes, paying for costs from which they receive no direct benefit. SBUA requested that PG&E provide detailed examples of how disaggregated Reliability calculations would better reflect cost causation principles. SBUA states it is in agreement with SPD's recommendation that in preparing its TY 2027 GRC application, PG&E can either use SPD's disaggregated approach or an equally logical approach to disaggregation that may be proposed by parties;[31]
2. Risk-Averse Risk Scaling Function: SBUA strongly supports SPD's recommendation for parallel RAMP analyses using a risk neutral, linear risk-scaling function. SBUA further recommends that PG&E include metrics evaluating the impact of its current risk-averse scaling approach on different ratepayer classes, including for small business customer classes;[32] and
3. Continued Funding of Controls with Low Cost-Benefit Ratio: SBUA cites with approval the SPD Report statement that "[t]here is an apparent presumption by PG&E throughout this RAMP that mitigation programs approved in prior GRCs are given an almost automatic green light for continued approval and funding in the TY 2027 GRC."[33] SBUA endorses SPD's finding that mitigation programs previously approved in past GRCs must undergo a rigorous justification process in the TY 2027 GRC, stating that programs with low cost-benefit ratios should not be

[31] SBUA Opening Comments at 2-3.

[32] SBUA Opening Comments at 3-4.

[33] SBUA Opening Comments at 4, citing to SPD Report at 4.

> automatically approved without clear evidence of continued value.[34]

On the issue of whether the PG&E RAMP Report was complete and in compliance with the requirements of the Phase 2 RDF, SBUA states it strongly supports SPD's recommendations as stated in the SPD Report and in each chapter as many of these recommendations either directly impact small business customers as a rate class or are in common with all of the ratepayers.[35] SBUA endorses SPD's list of issues that need to be addressed in the TY 2027 GRC, arguing that to ensure these recommendations lead to meaningful outcomes requires the inclusion of clear accountability measures, such as deadlines for implementing SPD's recommendations and periodic reporting requirements. Additionally, PG&E should establish metrics to evaluate the success of its risk mitigation strategies, including the extent to which they reduce costs and enhance reliability for small business customers.[36]

Regarding the implementation of the ESJ initiatives, SBUA states that the question of whether PG&E has reasonably implemented the ESJ Pilot Study and other related directives ordered in D.22-12-027, and whether the Application aligns with or impacts the achievement of any of the nine goals of the Commission's ESJ Action Plan, are of high importance to small business and other customers. SBUA notes Action Items #1 and #6, which address equity in risk evaluation and the impact of risk mitigation investments on DVCs, noting that small businesses in DVCs face compounded challenges, such as lower access to resources for resilience investments and higher sensitivity to service

[34] SBUA Opening Comments at 4.

[35] SBUA Opening Comments at 5.

[36] SBUA Opening Comments at 8.

disruptions. SBUA recommends that, to adequately address these disparities, PG&E should explicitly identify small business customers as a separate category in its ESJ analyses and ensure that risk mitigation strategies for DVCs include tailored support for small businesses, such as targeted outreach, resilience grants, and technical assistance.[37]

In reply comments, SBUA states that granular data is a requirement for enabling selection of the most cost-effective risk mitigation projects, and recommends the PG&E RAMP Report be updated to provide supplemental granular data prior to the filing of the TY 2027 GRC application.[38] SBUA also states that PG&E should include an analysis and forecast of ratepayer bill impacts when comparing alternative risk mitigation programs, arguing that the ability to effectively collect and analyze data is one of the key aspects of setting rates where costs are assigned and recovered from the cost driver.[39]

#### 3.9.5. TURN Comments

TURN commented on several areas of the SPD Report, including (1) Risk Averse vs. Risk Neutral Scaling Functions, (2) Ability of Reviewers to Make Apples-To-Apples Comparisons of the Cost-Effectiveness of Alternative Mitigations, and (3) Wildfire Risk.

1. Risk Averse vs. Risk Neutral Scaling Functions: Noting that the shape and slope of the scaling function , *i.e.*, whether it should reflect a risk-neutral or risk-averse attitude toward risk and, if risk-averse, how extreme the risk-averse function should be, are critical issues in the RDF that can have a huge impact on calculations of baseline risk and benefit-cost ratios, TURN took issue with

[37] SBUA Opening Comments at 11.

[38] SBUA Reply Comments at 5.

[39] SBUA Reply Comments at 4-5.

"SPD's one-paragraph discussion of PG&E's scaling function."[40] TURN states that attributing to all disadvantaged and vulnerable communities households a single, market-based risk attitude based on financial transactions of large and sophisticated firms runs counter to the Commission's ESJ objectives, which was not discussed in the SPD Report. TURN notes that PG&E has stated that, in its GRC, it has no intention of providing benefit-cost ratio calculations based on anything other than its preferred, extremely risk-averse scaling function. TURN argued that PG&E's position conflicts with the requirements of D.24-05-064, which apply to PG&E's presentation of benefit-cost ratio results in its upcoming GRC.[41] TURN notes that MGRA had recommended that PG&E's GRC application not be considered unless it includes calculation of cost-benefit ratios based on risk-neutral, linear risk scaling;[42]

2. Ability of Reviewers to Make Apples-To-Apples Comparisons of the Cost-Effectiveness of Alternative Mitigations: TURN states that SPD does not address TURN's recommendation regarding the fact that cost-benefit ratios are not calculated on an "apples to apples" basis because they represent the utilities' proposal, rather than a comparison of alternatives;[43] and

3. Wildfire Risk: TURN states it is predominately in agreement with SPD regarding the issues raised for PG&E to address or remediate in its next GRC filing. Specifically as to tranching issues, TURN notes that the SPD Report provides a detailed analysis raising issues with how PG&E assigns circuit segments to tranches and recommends that PG&E "demonstrate how it builds tranches based on the risk scores calculated and assigned to each circuit

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[40] TURN Opening Comments at 2.

[41] TURN Opening Comments at 4.

[42] TURN Opening Comments at 5.

[43] TURN Opening Comments at 9.

> segment" and that PG&E should explain why each circuit segment was assigned to a particular tranche and why lower risk circuit segments are assigned to higher risk tranches. TURN argues that PG&E's tranches should be based on either the highest to lowest risk per mile circuit segments or the highest to lowest risk per mile for project-level aggregations of circuit segments to account for operational considerations, recommending that PG&E make this change for its GRC filing.[44]

As to utility risk modelling, TURN notes that its purpose is to allow all parties to assess, explore, and understand utility risk and then propose mitigations that balance risk reduction with costs, adding that the Commission has stated "the objective of the S-MAP is to fulfill the state's policy of ensuring that the Commission and the energy utilities place the safety of the public and utility employees as the top priority."[45]

TURN notes that, under D.22-12-027, a key output of risk modeling is a cost-benefit ratio, which provides cost-effectiveness values for multiple mitigations. TURN argues that the presentation of cost-benefit ratios to date by PG&E is misleading when alternative mitigations are capable of serving a similar risk mitigation purpose. Rather than calculating the cost-effectiveness of mitigations whereby each mitigation is assumed to be deployed to the same risk area, the utilities calculate cost benefit ratios based only on the utility-specific *proposal*, which usually entails deployment of its preferred mitigation to the highest-risk areas or tranches, while other mitigations are assumed and modeled as mitigating risk to other lower-risk areas. These calculations do not lend themselves to direct comparisons of cost-benefit ratios, resulting in cost-benefit

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[44] TURN Opening Comments at 11-12.

[45] TURN Opening Comments at 11.

ratios that are only relevant to the utility's proposal, rather than alternatives which would deploy alternative mitigations to the same risk area or tranche as the utility's proposal. TURN believes that, whenever alternative mitigations can be deployed to reduce risk, PG&E should provide a similar tool with its workpapers for all top risk areas when it files its GRC.[46]

Arguing that PG&E's PSPS Risk Modeling Assumptions are flawed, TURN states that SPD did not address some key assumptions regarding PG&E's PSPS risk calculations, specifically: (1) PG&E's modeled number of customer minutes of outage is completely unrealistic when compared with recent totals; and (2) PG&E underestimates the wildfire mitigation effectiveness of PSPS. Further, TURN argues that PG&E's modeling of the impact of climate change on wildfire risk is "opaque," noting that SPD found that PG&E did not provide a sufficient explanation of the modeled climate change impacts. TURN asserts that it is PG&E's obligation to present and support its risk modeling assumptions so as to allow intervenors to understand its modeling, which it had not done with respect to the impact of climate change on the wildfire risk.[47]

Noting that D.22-12-027 states that each IOU must calculate the Safety attribute using one of two prescribed methods, either a VSL method published by the DOT or one provided by the US Department of Health and Human Services, TURN asserts that PG&E does not follow the clear instructions in D.22-12-027, but instead opts for a hybrid approach that does not comply with either alternative. TURN argues that rather than simply updating the DOT value using DOT's prescribed data, PG&E adds other California-specific inputs in a way that

[46] TURN Opening Comments, Exhibit B at 11-12.

[47] TURN Opening Comments at 13-17.

is at odds with the required DOT methodology by applying California-specific income and wage multipliers to the nationwide DOT VSL calculation.[48]

#### 3.9.6. PG&E Comments

In its comments, PG&E states that it will address the specific findings and recommendations of the SPD Report and party comments in its TY 2027 GRC application due in May 2025. PG&E agrees with SPD's recommendation that all risk-reducing programs, whether controls or mitigations, that are needed to comply with regulatory requirements should be identified,[49] asserting that it has done so in previous RAMPs and GRCs, and states it will continue to identify the relevant regulatory requirements for mitigations and controls in its TY 2027 GRC application.[50] As for the assertion that mitigation programs approved in prior GRCs are given an almost automatic green light for continued approval and funding in the TY 2027 GRC, PG&E argues that, to the contrary, in its 2024 RAMP PG&E provided justifications for proposed mitigation programs with cost-benefit ratios below 1.0, asserting that this showing was in accordance with the directive in the Commission's RDF decision, citing D.22-12-007, Appendix A at A-16.[51]

PG&E takes issue with Cal Advocates' recommendation that the Commission direct PG&E to evaluate the effects of incomplete safety, reliability, and maintenance work and address this deficiency in its upcoming TY 2027 GRC application.[52] PG&E argues that the 2027 baseline risk in its RAMP does reflect

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[48] TURN Opening Comments, Exhibit B at 5-7.

[49] PG&E Opening Comments at 3.

[50] PG&E Opening Comments at 3.

[51] PG&E Opening Comments at 3-4.

[52] PG&E Reply Comments at 2, citing Cal Advocates Opening Comments at 6.

the risk reduction of mitigations actually performed from 2023-2026 and that this issue is being generally addressed elsewhere, noting that "the assessment of risk reduction achieved from prior mitigation activities will be addressed in the Risk Mitigation Accountability Report (RMAR) which is still under development in Phase 4 of the Risk OIR (R.20-07-013.)"[53]

PG&E disagrees with Cal Advocates' assertion that "PG&E fails to meet the graphical progress reporting requirements imposed by D.22-10-002,"[54] stating that it adequately complied with this requirement in a 2024 RAMP Report workpaper by providing graphics of historical progress based on data from its Risk Spend Accountability Report filings.[55]

### 3.10 April 2025 Ruling and PG&E Response

The April 2025 Ruling requires PG&E to address the following four areas of deficiency in its RAMP application: (1) Provide a parallel risk evaluation using a risk-neutral, linear risk scaling function; (2) Identify regulatory requirements for each risk mitigation program/project presented in the GRC; (3) Provide a parallel set of reliability cost calculations using a disaggregated approach; and (4) Remove risk tolerance as a justification for mitigation selections unless the Commission has established a risk tolerance standard.

In the PG&E Response to the April 2025 Ruling, PG&E states that its 2027 GRC application filed on May 15, 2025, addresses requirements (1), (2), and (4) of the April 2025 Ruling.[56] While we agree that PG&E has addressed requirements

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[53] PG&E Reply Comments at 2-3.

[54] PG&E Reply Comments at 3, citing Cal Advocates Opening Comments at 7.

[55] PG&E Reply Comments at 3-4, with footnote 9 citing WP RM-RSKMF-01-Historical Progress and footnote 10 citing RAMP-2024_DR_CalAdvocates_002-Q10Atch01.

[56] *See* PG&E Response to April 2025 Ruling, submitted to the PG&E 2027 Test Year GRC service list (A.25-05-009) on June 20, 2025.

(1), (2), and (4) of the April 2025 Ruling, we recognize that these materials are subject to litigation within the GRC proceeding.

The PG&E Response to the April 2025 Ruling also addresses requirement (3) of the April 2025 Ruling, which required PG&E to provide reliability cost calculations using the disaggregated approach recommended in the SPD Report, with PG&E to provide separate risk analyses using a risk-neutral risk-scaling function and PG&E's preferred risk-averse scaling function.[57] PG&E states that it addressed that requirement using the ICE 2.0 calculator that was released by LBNL at the end of April 2025 rather than the ICE 1.0 calculator that was retired when the ICE 2.0 calculator was released. Recognizing that using the ICE 2.0 calculator leads to some differences with the values submitted in PG&E's 2024 RAMP and 2027 GRC, PG&E states it believes it is prudent to make this update now as it serves to improve the accuracy of the calculator for all California utility reliability analyses and argues that its decision to use the ICE 2.0 calculator complies with the RDF Proceeding.[58]

PG&E asserts that it applied the disaggregation approach at the tranche level of each risk model, which is the granularity at which risk and mitigation analysis is performed for the RAMP and GRC, and provided the results of applying the disaggregated approach in Appendix A to the PG&E Response to the April 2025 Ruling.[59] While we find that PG&E has responded to requirement (3) of the April 2025 Ruling, we recognize that the materials related to the ICE 2.0 calculator are subject to litigation within the GRC proceeding.

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[57] April 2025 Ruling at 10.

[58] PG&E Response to April 2025 Ruling at 2-3.

[59] PG&E Response to April 2025 Ruling at 3-5.

### 3.11 PG&E and Cal Advocates October and November 2025 Comments

In its October 24, 2025 opening comments, PG&E recommended that the Commission close this proceeding and address any remaining issues in the PG&E GRC proceeding A.25-05-009.[60] In its October 24, 2025 opening comments, Cal Advocates listed several claimed deficiencies in PG&E's RAMP application and recommended that the Commission direct PG&E to do the following in its 2028 RAMP and Test Year 2031 GRC proceedings: (1) provide a thorough evaluation and comparison of covered conductor as an alternative wildfire mitigation; (2) evaluate the risk from delayed mitigation of wildfire risk due to the time needed to implement undergrounding when compared to wildfire risk mitigation alternatives; (3) include an analysis and forecast of ratepayer bill impacts when comparing alternative risk mitigation alternatives; (4) evaluate the risks from incomplete safety, reliability, and performance work; and (5) provide unscaled cost-benefits analysis for all mitigation proposals.[61] In its reply comments, PG&E asserted that Cal Advocates' claimed deficiencies with PG&E's RAMP application can be addressed in the current PG&E GRC proceeding A.25-05-009 and that Cal Advocates' proposed requirements in the next RAMP and GRC proceedings would be changes to the risk decision-making framework adopted in the rulemaking proceeding R.20-07-013 that should be addressed in that rulemaking or a successor proceeding.[62] We agree with PG&E that Cal Advocates' new proposed rules are more properly addressed in a rulemaking proceeding in which the Commission can consider and set rules applicable to all

[60] PG&E October 24, 2025 Opening Comments at 1.

[61] Cal Advocates October 24, 2025 Opening Comments at 2.

[62] PG&E November 3, 2025 Reply Comments at 2-5, 10.

subject utilities,[63] and that any remaining issues within the scope of this proceeding can be addressed in the current PG&E GRC proceeding A.25-05-009. As a result, we decline to adopt Cal Advocates' recommendations in its October 24, 2025 comments.

## 4. Carry Forward of Intervenor Compensation Hours and Costs

Several intervenors have filed notices of intent to claim intervenor compensation in this proceeding. Because this RAMP proceeding is the initial phase of PG&E's 2027 Test Year GRC process for which it filed its GRC Application A.25-05-009 on May 15, 2025, those intervenors shall be allowed to carry forward their hours and costs from this proceeding for consideration in A.25-05-009, subject to the Commission's intervenor compensation rules and requirements.

## 5. Conclusion

The PG&E RAMP Report filed by PG&E with its Application in this proceeding provides a detailed assessment of PG&E's top safety risks, risk mitigation programs and projects and the associated expenditures to address those risks for the 2027 to 2030 period covered by PG&E's GRC application A.25-05-009. SPD evaluated the PG&E RAMP Report in the SPD Report, and the parties to this proceeding were given the opportunity and did provide comments regarding both the PG&E RAMP Report and the SPD Report. The April 2025 Ruling required PG&E to provide responses to four deficiencies regarding PG&E's RAMP Application, and PG&E fully complied with that ruling in the PG&E Response to the April 2025 Ruling.

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[63] D.25-08-032 closed the RDF Proceeding. That decision deferred the resolution of one issue to "a successor proceeding, which may also address other Risk-Based Decision-Making issues." D.25-08-032 at 9.

The record developed in this proceeding, including the PG&E RAMP Report, the SPD Report, the parties' comments to the PG&E RAMP Report and the SPD Report, and the PG&E Response to the April 2025 Ruling, reflects PG&E compliance with all Commission RAMP-related decisions and requirements. In addition, any matters related to the issues in scope in this proceeding that have not already been addressed in this proceeding can be addressed in the current PG&E TY 2027 GRC proceeding A.25-05-009. As a result, we determine that it is appropriate to close this proceeding.

## 6. Summary of Public Comment

Rule 1.18 of the Commission's Rules of Practice and Procedure (Rules) allows members of the public to submit written comments in a Commission proceeding, including via the Public Comment tab, which is found at the online Docket Card on the Commission's website. Rule 1.18(b) requires that written comments by the public submitted in a proceeding be summarized in the final decision issued in that proceeding. No written public comments were submitted to the Commission regarding this proceeding.

## 7. Procedural Matters

This decision affirms the rulings made by the assigned ALJ and the assigned Commissioner in this proceeding. All motions not ruled on are deemed denied.

## 8. Comments on Proposed Decision

The proposed decision of ALJ Peter Wercinski in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on __________, and reply comments were filed on ______________ by ________________.

## 9. Assignment of Proceeding

Commissioner John Reynolds is the assigned Commissioner and Peter Wercinski is the assigned Administrative Law Judge in this proceeding.

## Findings of Fact

1. On May 15, 2024, PG&E filed the PG&E RAMP Report and associated Application in this proceeding. On December 1, 2025, the assigned ALJ issued a ruling entering into the evidentiary record of this proceeding the PG&E RAMP Report, supporting workpapers, and errata.
2. On December 2, 2024, the assigned ALJ issued a ruling entering into the evidentiary record of this proceeding the SPD Report evaluating the PG&E RAMP Report.
3. Parties to this proceeding were given the opportunity to and did provide comments on the PG&E RAMP Report and the SPD Report.
4. The April 2025 Ruling directed PG&E to serve additional information and other requirements to address four areas of deficiency in PG&E's RAMP application.
5. On May 15, 2025, PG&E filed its 2027 GRC Application A.25-05-009.
6. In the PG&E Response to the April 2025 Ruling, PG&E addressed the four areas of deficiency in PG&E's RAMP application identified in the April 2025 Ruling.

## Conclusions of Law

1. PG&E filed the PG&E RAMP Report and the Application in this proceeding pursuant to the procedures set forth in D.14-12-025, D.18-12-014, D.21-11-009, and D.22-12-027.
2. The record developed in this proceeding, including the PG&E RAMP Report, the SPD Report, the parties' comments to the PG&E RAMP Report and

the SPD Report, and the PG&E Response to the April 2025 Ruling, reflects PG&E compliance with all Commission RAMP-related decisions and requirements.

3. Any matters related to the issues in scope in this proceeding that have not already been addressed in this proceeding can be addressed in the current PG&E TY 2027 GRC proceeding A.25-05-009.

4. Any changes to the risk decision-making framework adopted in the rulemaking proceeding R.20-07-013 are more properly addressed in a rulemaking proceeding in which the Commission can consider and set rules applicable to all subject utilities.

5. Those intervenors who have filed notices of intent to claim intervenor compensation in this proceeding should be allowed to carry forward their hours and costs from this proceeding for consideration in A.25-05-009, subject to the Commission's intervenor compensation rules and requirements.

6. This proceeding should be closed.

**O R D E R**

**IT IS ORDERED** that:

1. Those intervenors who have filed notices of intent to claim intervenor compensation in this proceeding shall be allowed to carry forward their hours and costs from this proceeding for consideration in Application 25-05-009, subject to the Commission's intervenor compensation rules and requirements.

2. Application 24-05-008 is closed.

This order is effective today.

Dated ______________________________, at Sacramento, California