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ATTACHMENT A

Draft Scope of Isses in A.25-11-006 for Party Comment

February 3, 2026

Application 25-11-006: DRAFT Scope of Issues

1. Should PG&E be authorized to implement its proposed rates for gas, distribution, transmission, and storage services for 2027, 2028, 2029, and 2030?
    a. Should PG&E be authorized to combine its Gas Cost Allocation Proceeding (GCAP) and Gas Transmission and Storage (GT&S) Cost Allocation and Rate Design proposals in a single application for the 2027-2030 time period?
    b. Is PG&E's GCAP proposal for the 2027-2030 time period just and reasonable?
    c. Are PG&E's GT&S Cost Allocation and Rate Design proposals for the 2027-2030 time period just and reasonable?
    d. Is PG&E's proposal to transition from marginal cost to embedded cost allocation just and reasonable for the 2027-2030 time period?
    e. Does PG&E's local transmission analysis accurately represent cost allocations related to gas transmission and storage for the 2027-2030 time period?
    f. How should PG&E scale existing transmission level customer access charges by customer tier across 2027, 2028, 2029, and 2030?
2. Are PG&E's on-system electric generation demand and throughput forecasts just and reasonable for the 2027-2030 time period?
3. Are PG&E's on-system, non-generation demand and throughput forecasts just and reasonable for the 2027-2030 time period?
4. Are PG&E's backbone load factors, backbone throughput adjustments, and backbone rate impacts reasonable for the 2027-2030 time period?
5. Would PG&E's proposed Baja-Redwood rate differential appropriately reflect cost causation for that portion of PG&E's service territory during the 2027-2030 time period?
6. Should the local transmission methodology and resulting costs based on an abnormal peak day method weighted by subsystem footage (66.5% core/33.5% non-core) be adopted for the 2027-2030 time period?
7. Should the embedded cost methodology, including the cost method percentages, proposed by PG&E for the 2027-2030 time period be used to determine the revenue allocation for PG&E's gas distribution revenue requirement across customer classes?
8. Is PG&E's proposed allocation of costs related to energy efficiency and energy savings assistance programs just and reasonable for the 2027-2030 time period?
    a. Should energy efficiency program costs be allocated across customer classes?

   b. Should energy savings assistance programs' costs be allocated solely to residential customers?
9. Is PG&E's proposed core brokerage fees for the 2027-2030 time period just and reasonable?
10. Is PG&E's updated natural gas vehicle compression study, which suggests the adoption of a proposed compression component of $1.15 per therm for the compression component for rate schedule G-NGV2 in 2027 through 2030, just and reasonable?
11. Are PG&E's proposed updates to the master meter discount for the 2027-2030 time period just and reasonable?
12. Should PG&E's proposed backbone cost allocation to the various backbone paths and backbone level end-use proposals for the 2027-2030 time period be adopted?
13. Over the 2027-2030 time period, should PG&E be authorized to continue to:
    a. Adjust local transmission cost allocation and gas rate designs to account for local transmission rate discounts;
    b. Provide separate average volumetric rate designs for (1) core and (2) non-core and wholesale customer classes;
    c. Recover local transmission rates as non-bypassable for customers that do not qualify for end-user service.
    d. Design a single average volumetric local transmission rate for all core classes and a separate single average volumetric local transmission rate for non-core and wholesale customer classes.
14. Should PG&E's proposed storage cost allocation and rate design for the 2027-2030 time period be adopted?
    a. Are PG&E's existing tariffed maximum charges for tariffs G-PARK and G-LEND just and reasonable to extend through 2030?
    b. Is it reasonable to authorize PG&E to continue to recover its Inventory Management costs in its end-use transportation rates where it can differentiate cost recovery by customer class groups in a manner that reflects cost causation and utilization of the service?
    c. Should PG&E be authorized to adjust historic imbalance data using annual forecast throughput based on the results of the Inventory Management Study?
    d. Should PG&E use each individual year's throughput forecast to divide the "Big 3" segments (Core, Market-Responsive Electric Generation (EG), and Industrial) into end-use customer classes?
15. PG&E's core storage capacity charge and accompanying balancing account (the Core Firm Storage Account or CFSA) are collected through the core procurement

rate. The over- or under-collections tracked in PG&E's CFSA can add volatility to the already inherently volatile monthly core procurement rate.

a. Should PG&E's core storage capacity charge and accompanying balancing account CFSA be collected in 2027, 2028, 2029, and 2030 through the transportation rate, rather than through the core procurement rate as is currently the case?
b. Could requiring PG&E to recover CFSA over- or under-collections through PG&E's existing end-of-year balancing accounts advice letter true up filings during the 2027-2030 time period eliminate the existing volatility related to PG&E's CFSA that impacts PG&E's core procurement rate?
c. Could removing the over- or under-collections tracked in PG&E's CFSA from the procurement rate during the 2027-2030 time period dampen winter bill volatility and help mitigate some affordability concerns?
d. What implications would collecting the core storage capacity charge through the transportation rate have on Core Transportation Agents (CTAs) that secure their own storage in the 2027-2030 time period?
e. Should a CTA-specific transportation rate that excludes storage revenue collection be charged to CTAs that secure their own storage in the 2027-2030 time period?

16. Is it reasonable to authorize PG&E to continue to blend the storage revenue requirements collected in backbone transmission and bundled core end-user rates to develop average annual rates for the 2027-2030 time period?
17. Should PG&E's gas distribution cost allocation and rate design proposals for the 2027-2030 time period be adopted, including the following issues:
    a. Would PG&E's proposal for a glide path modifier proposed ease the transition from marginal cost to embedded cost and minimize sudden changes in customer rates?
    b. Would PG&E's proposal to increase its Monthly Minimum Transportation Charge from $4.00 to $15.00 help ensure customers contribute a fair share of the costs PG&E has already incurred to provide gas services?
        i. PG&E proposed to calculate a monthly fixed charge (MFC) for residential customers and seek cost recovery for implementation of the MFC in its 2031 General Rate Case (GRC) application, and use PG&E's 2031 CARD proceeding to determine the amount of the MFC.
        ii. Would implementing a residential MFC in the 2027-2030 time period, in lieu of PG&E's proposed $15 MMTC, be just and reasonable, given that PG&E's Application states its proposed MFC to be implemented

through its future 2031 GRC application represents "a more appropriate cost-based rate design in the long term?"

iii. Should the Commission consider a flat MFC for the 2027-2030 time period?

iv. Should the Commission consider an income-graduated fixed charge for the 2027-2030 time period when resolving A.25-11-006?

c. Should PG&E be authorized to allocate its 2025 Energy Efficiency Revenue Requirement over the 2027-2030 time period based on the allocation percentages proposed in this application?

d. Is it reasonable for PG&E to incorporate a Core Brokerage Fee of $.0.042 per dekatherm into the illustrative core procurement rate table and calculate the estimated annual revenue based on the core procurement volumes for the 2027-2030 time period, as outlined in Chapter 2 of this application?

e. Should PG&E be authorized to determine annual revenues related to the recovery of costs related to its G-NGV2 rates by multiplying the total compression cost adder from the study provided in Chapter 8 of this application, and the currently applicable state and federal fuel taxes and the current cost of electricity in present rates, by the proposed G-NGV2 annual throughput, during the 2027-2030 time period, as described in Chapter 3 of this application?

f. Is it reasonable for PG&E to use the most recent four years of gas usage data (November 2020-October 2024) to calculate updated baseline quantities? and

g. Which adopted annual sales forecast should be used for PG&E to calculate rates for the 2027 -2030 time period, such that its rates will reflect actual customer demand?

18. Should PG&E be authorized to increase its storage assets portfolio to meet the 1-in-10 Reliability Standard?
19. Should PG&E be authorized to increase the Non-Allocated Storage Inventory Maximum Capacity?
20. How can the Commission ensure that core customers are charged reasonable rates for storage purchased through the Independent Storage Providers (ISPs) given the concentration of ISP ownership and the proposed increasing dependence of PG&E on ISP storage to meet core peak demand?
21. How would PG&E's proposals in A.25-11-006 impact the Commission's ability to implement any of the nine goals of the Commission's Environmental and Social Justice Action Plan?