

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE

STATE OF CALIFORNIA

ADMINISTRATIVE LAW JUDGES DARRYL J. GRUEN, ELIZABETH FOX,
and JOHN LARSEN, co-presiding

Application of Pacific Gas and Electric) EVIDENTIARY
Company for Authority, Among Other) HEARING
Things, to Increase Rates and Charges)
for Electric and Gas Service Effective) Application
on January 1, 2027. (U 39 M)) 25-05-009

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VIRTUAL PROCEEDING

MAY 12, 2026 - 9:40 A.M.

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ADMINISTRATIVE LAW JUDGE FOX: Let's go on the record.

The Commission will come to order. We are on the record. Good morning. We are here on Tuesday, May 12th for Application 25-05-009, Application of Pacific Gas and Electric Company for authority, among other things, to increase rates and charges for electric and gas service effective on January 1, 2027.

Let's start with appearances. We'll begin with the applicant.

MR. MATTHEWS: Good morning, your Honor. Walker Matthews on behalf of PG&E. We also have on this morning my co-counsel Aaron Lewis who I will ask to introduce himself.

MR. LEWIS: Good morning, your Honors, Aaron Lewis for PG&E, Pacific Gas and Electric Company. It's A-a-r-o-n L-e-w-i-s.

ALJ FOX: Thank you. And going in the order of parties I see in my participant list, let's move to Cal Advocates.

MR. BAWA: Good morning, your Honor. Niki Bawa representing Cal Advocates.

1 ALJ FOX: And I see two other attorneys from
2 Cal Advocates in the panelist list. Will they be
3 panelists today or just observing?

4 MR. BAWA: No, your Honor, they will both be
5 observing.

6 ALJ FOX: Okay. Next I see EPUC, Indicated
7 Shippers.

8 MR. CARREJO: Good morning, your Honor.
9 Antonio Carrejo, C-a-r-r-e-j-o, on behalf of the Energy
10 Producers and Users Coalition and Indicated Shippers.
11 I'll be monitoring today, unless any housekeeping or any
12 issues impacting our witness Brian Collins that's up
13 tomorrow. Thank you.

14 ALJ FOX: Thank you. Next in my list I see
15 MGRA.

16 MR. MITCHELL: Good morning, your Honor.
17 Joseph Mitchell, M-i-t-c-h-e-l-l, representing the
18 Mussey Grade Road Alliance.

19 ALJ FOX: Thank you.

20 Next I see NRDC.

21 MS. BERMAN: Good morning, your Honor. Sarah
22 Berman for NRDC.

23 ALJ FOX: Thank you. And the last on my list I
24 see is TURN.

25 MS. GOODSON: Good morning, your Honor. Hayley

1 Goodson for TURN, G-o-o-d-s-o-n. I have two colleagues
2 with me this morning, both of whom will be participating
3 in the hearing. I'll ask them to introduce themselves.

4 MR. CHENG: Good morning, your Honors. This is
5 David Cheng, C-h-e-n-g, and I'll be conducting cross for
6 the first panel this morning. Thank you.

7 ALJ FOX: Thank you.

8 MS. FALL: Good morning, your Honors.
9 A. Mireille Fall, that's M-i-r-e-i-l-l-e, and I will be
10 conducting cross for TURN on the second panel.

11 ALJ FOX: Thank you very much, Ms. Fall.

12 Are there any additional panelists that I did
13 not see in my list when going through it?

14 (No response.)

15 ALJ FOX: Seeing no hands, we can move on.
16 Before we start cross, I would just like to reflect that
17 before we began our session today, we addressed several
18 housekeeping matters, including a request for admission
19 of exhibits, which we -- two requests for admission of
20 exhibits -- which we will be taking on later in today's
21 session. Also PG&E provided updates on witness
22 scheduling and asked some follow-up questions about that
23 that the judges addressed off the record.

24 So moving on -- sorry. My computer is not
25 being very cooperative this morning. I'm trying to find

1 a document that has disappeared. Here we go. Okay. So
2 let's get started with our panel of witnesses.

3 PG&E, please introduce and kick us off with the
4 panel.

5 MR. LEWIS: Thank you, your Honor. I would
6 like to mention that I have yet to complete the attorney
7 attestation, so if we can do that beforehand.

8 ALJ FOX: Thank you for alerting me to that. I
9 noticed that the moment that you popped up on the
10 screen. So you have had a chance to review the
11 attestations that previously circulated?

12 MR. LEWIS: I have, your Honor.

13 ALJ FOX: Yes. Okay.

14 Do you swear under penalty of perjury that you
15 will tell the whole truth and nothing but the truth?

16 MR. LEWIS: I do, your Honor.

17 ALJ FOX: You may prepare your witness.

18 MR. LEWIS: Thank you, your Honor. Your Honor,
19 PG&E calls its next witness, Mr. David Console.

20 MR. CONSOLE: Good morning.

21 ALJ FOX: Good morning.

22 MR. LEWIS: And, your Honor, I believe
23 Mr. Console similarly needs to perform the attestations
24 as well.

25 ALJ FOX: Thank you very much. Same issue with

1 my computer this morning.

2 Mr. Console, do you swear under penalty of
3 perjury that you will tell the whole truth and nothing
4 but the truth?

5 MR. CONSOLE: Yes, I do, your Honor.

6 ALJ FOX: And do you agree to the attestations
7 that circulated before this hearing?

8 MR. CONSOLE: Yes, I do.

9 ALJ FOX: Very good. Thank you.

10 DAVID CONSOLE,
11 called as a witness by Pacific Gas and
12 Electric Company, having been sworn and
13 attested, testified as follows:

14 DIRECT EXAMINATION

15 BY MR. LEWIS:

16 Q Mr. Console, would you spell your full name and
17 provide your business address for the record, please.

18 A My name is David Console, spelled D-a-v-i-d,
19 last name is C-o-n-s-o-l-e, business address is 300
20 Lakeside Drive, Oakland, California.

21 Q Mr. Console, would you please introduce
22 yourself, briefly.

23 A Yes. Just briefly, I am the director of PG&E's
24 advanced meter infrastructure responsible for the
25 cross-functional planning, coordination, and execution

1 of advanced meter infrastructure program management
2 activities and operations.

3 Prior to this role, I was a manager of AMI
4 Asset Management in operations and had worked for PG&E's
5 finance department. I have a bachelor's degree in
6 economics from UCSC and a master's degree in finance
7 from Golden State University.

8 Q All right. Thank you, Mr. Console. I'd like
9 to confirm the testimony that you're sponsoring in this
10 proceeding. In what has been marked for identification
11 as Exhibit PG&E-06, are you sponsoring Chapter 8, Gas
12 AMI Program?

13 A Yes, I am.

14 Q And are you sponsoring Chapter 9, Electric AMI
15 Program?

16 A Yes, I am.

17 Q Are you sponsoring the workpapers for Exhibit
18 PG&E-06, Chapters 8 and 9 as presented in the Exhibit
19 PG&E-06 workpapers?

20 A Yes, I am.

21 Q In what has been marked as Exhibit PG&E-18, are
22 you co-sponsoring Chapter 8 Gas AMI Program Rebuttal
23 Testimony?

24 A Yes, I am.

25 Q Are you sponsoring Chapter 8, Attachment B,

1 Comprehensive Gas AMI Replacement Program?

2 A Yes, I am.

3 Q As well as Chapter 8, Attachment B, Workpapers
4 8-11 to 8-12, Adjusted for Volume and Chapter 8,
5 Attachment C, Workpapers 8-14 to 8-16, Adjusted For
6 Reduced Volume?

7 A Yes, I am.

8 Q In what has been marked as Exhibit PG&E-18, are
9 you co-sponsoring Chapter 9, Electric AMI Program
10 Rebuttal Testimony?

11 A Yes, I am.

12 Q Are you sponsoring Chapter 9, Attachment A,
13 Workpapers 9-1 to 9-4, Revised Glossary of Key Terms?

14 A Yes, I am.

15 Q And Chapter 9, Attachment B, Workpaper 9-5,
16 Electric Meter In-Service By Vintage?

17 A Yes, I am.

18 Q And Chapter 9, Attachment C, Epic 3.43 Final
19 Report?

20 A Yes, I am.

21 Q And Chapter 9, Attachment D, Workpapers 9-12 to
22 9-16, U.S. Industry Landscape Update?

23 A Yes, I am.

24 Q Chapter 9, Attachment E, Workpapers 9-6 to
25 9-11, Proposed Deployments in High-Fire-Risk Areas?

1 A Yes, I am.

2 Q And Chapter 9, Attachment F, Workpapers 9-24 to
3 9-35, Transformer and Service Line Upgrade Economic
4 Analysis?

5 A Yes, I am.

6 Q Chapter 9, Attachment G, Workpaper 9-36,
7 Customer Avoided Costs of Electrical Panel and Service
8 Line Upgrades?

9 A Yes, I am.

10 Q Okay. And the documents in Exhibit PG&E-18,
11 Appendix A that relate to your sponsored rebuttal
12 testimony?

13 A Yes, I am.

14 Q Can you briefly describe what activities and
15 programs this testimony covers.

16 A Mr. Lewis, can you restate your question.

17 Q Can you describe very briefly what your
18 testimony covers.

19 A As it pertains to Exhibit 6, Chapter 8, Gas
20 AMI? Is that your question?

21 Q Yes.

22 A This testimony covers the continuation of
23 PG&E's Gas AMI Comprehensive Replacement Program that
24 began in 2023 that we are planning to complete by 2030.

25 Q Okay. Were these materials prepared by you or

1 under your supervision?

2 A Yes, they were.

3 Q Do you have any changes, corrections, or
4 additions to make at this time?

5 A No, I do not.

6 Q Are the facts contained in these exhibits true
7 and correct to the best of your knowledge?

8 A Yes, they are.

9 Q And do the opinions expressed therein represent
10 your best professional judgment?

11 A Yes, they do.

12 Q Thank you.

13 Your Honor, Mr. Console is now available for
14 cross-examination. However, I would like to go through
15 the same items for Mr. Castillo.

16 ALJ FOX: Very good.

17 MR. LEWIS: Okay.

18 ALJ FOX: I will ask him the same questions
19 that I asked Mr. Console before we started off.

20 Mr. Castillo, do you swear under penalty of
21 perjury that you will tell the whole truth and nothing
22 but the truth?

23 MR. CASTILLO: Yes, I do.

24 ALJ FOX: And do you agree to the attestations
25 that circulated previously?

1 MR. CASTILLO: Yes, I do.

2 ALJ FOX: Very good.

3 Please go ahead.

4 GUSTAVO CASTILLO,

5 called as a witness by Pacific Gas and
6 Electric Company, having been sworn and
7 attested, testified as follows:

8 DIRECT EXAMINATION

9 BY MR. LEWIS:

10 Q Mr. Castillo, can you please state and spell
11 your full name and provide your business address for the
12 record.

13 A Gustavo Castillo, G-u-s-t-a-v-o
14 C-a-s-t-i-l-l-o, business address is 111 Almaden
15 Boulevard, San Jose, California 95113.

16 Q Mr. Castillo, can you please briefly introduce
17 yourself.

18 A Sure. I am the director for our Field Metering
19 Department at Pacific Gas and Electric Company. In that
20 role, I am responsible for field operations associated
21 with electric metering, meter reading, and revenue
22 assurance.

23 For over 20 years I've had the opportunity and
24 privilege to serve customers across our service
25 territory in almost all aspects of utility metering and

1 field services. I have a bachelor's degree in business
2 management from the University of Phoenix, as well as an
3 MBA from the Ageno School of Business, Golden Gate
4 University.

5 Q I'd like to confirm the testimony you're
6 sponsoring in this proceeding. In what has been marked
7 for identification as Exhibit PG&E-04, are you
8 sponsoring Chapter 13, Field Metering?

9 A Yes, I am.

10 Q And Are you sponsoring the workpapers for
11 Exhibit PG&E-04, Chapter 13, as presented in Exhibit
12 PG&E-04, Workpapers?

13 A Yes, I am.

14 Q In what has been marked for identification as
15 Exhibit PG&E-06, are you sponsoring Chapter 8, Gas AMI
16 Program, Section C.1 and Section C.2?

17 A Yes, I am.

18 Q And the workpapers for Exhibit PG&E-06,
19 Chapter 8 as presented in Exhibit PG&E-06 Workpapers?

20 A Yes, I am.

21 Q In what has been marked as PG&E-12, are you
22 sponsoring your Statement of Qualifications?

23 A Yes, I am.

24 Q Okay. And in what has been marked as Exhibit
25 PG&E-16, are you sponsoring Chapter 13, Field Metering

1 Rebuttal Testimony?]

2 A Yes, I am.

3 Q And the documents in Exhibit PG&E-16,
4 exhibit -- Appendix A that relate to your sponsored
5 rebuttal testimony?

6 A Yes, I am.

7 Q Okay. In what has been marked as PG&E --
8 Exhibit PG&E-18, are you co-sponsoring Chapter 8, Gas
9 AMI Program Rebuttal Testimony?

10 A Yes, I am.

11 Q And Attachment A, which is Comprehensive Gas
12 AMI Replacement Program, Chapter B, Workpapers 8-11 to
13 8-12, Adjusted for Reduced Volume and Work -- Attachment
14 C, Workpapers 8-14 to 8-16, Adjusted for Reduced Volume?

15 A Yes, I am.

16 Q Okay. Can you briefly state what the
17 activities and programs this testimony covers are?

18 A Sure. The Gas AMI Comprehensive Replacement
19 Program that began in 2023.

20 Q Were these materials prepared by you or under
21 your supervision?

22 A Yes, they were.

23 Q Do you have any changes, corrections or
24 additions to make at this time?

25 A No, I do not.

1 Q Are the facts contained in these exhibits true
2 and correct to the best of your knowledge?

3 A Yes, they are.

4 Q And the opinions expressed therein represent
5 your best professional judgment?

6 A Yes, they do.

7 MR. LEWIS: Okay. Thank you, your Honor.
8 Mr. Castillo is now available for cross-examination.

9 ALJ FOX: Thank you very much, Mr. Lewis.

10 TURN, you may begin cross-examination.

11 MR. CHENG: Thank you, your Honor. Should I
12 also do the attestation first?

13 ALJ FOX: Yes. And thank you for your
14 reminder. Mr. -- I got this. Hold on.

15 Mr. Cheng, do you agree to the attorney
16 attestation that's circulated at the status conference?

17 MR. CHENG: Yes, I do, your Honor.

18 ALJ FOX: Very good. Thank you. Go ahead.

19 DAVID CONSOLE and GUSTAVO CASTILLO,
20 called as witnesses by Pacific Gas and
21 Electric Company, having been sworn,
22 testified as follows:

23 CROSS-EXAMINATION

24 BY MR. CHENG:

25 Q All right. Good morning, Mr. Console and

1 Mr. Castillo.

2 WITNESS CONSOLE: Good morning, Mr. --

3 WITNESS CASTILLO: Good morning.

4 Q So I'm going to go through -- and this morning
5 we'll be using a few exhibits, and so I hope you are
6 able to access those easily in front of you. Let's
7 start with what I call your direct testimony, which is
8 Exhibit 6, Chapter 8. If you could turn to page 8-2.
9 I'm sorry. Let me just say -- so when we do these page
10 references, could you let me know when you're there so I
11 know.

12 WITNESS CONSOLE: Yes. You are referring to
13 PG&E's opening testimony, Exhibit 6, Chapter 8, page
14 8-2?

15 Q Yes.

16 A Yes. Are you there, Gustavo?

17 WITNESS CASTILLO: Yeah.

18 WITNESS CONSOLE: Yes, we are.

19 Q And so, Mr. Console, per what Mr. Lewis was
20 saying, you're the sole witness for Exhibit 6; is that
21 correct?

22 A This is Exhibit 6, Chapter 8, which I'm a
23 co-witness with Gustavo Castillo.

24 Q Oh. Okay. Maybe I misunderstood. I thought
25 he was a co-witness for the rebuttal testimony but not

1 the direct testimony. Is he also a co-witness for the
2 direct testimony?

3 WITNESS CASTILLO: Yes, I am.

4 Q Okay. All right. Very well. Okay. So on
5 this page, from line 1 to 8 here -- I'm not going to
6 read it. I'm just going to briefly summarize it -- in
7 2024, PG&E filed Application 24-03-011 to replace 1.7
8 gas modules and other components of the gas AMI system,
9 and PG&E stated that the remaining cost to complete the
10 program after 2026 will be included in this GRC.

11 Is that a fair summary?

12 WITNESS CONSOLE: That is correct.

13 Q All right. Now, if you could turn to Exhibit
14 TURN-13, Attachment 1, and we're going to go to the very
15 last page, which is page 138. So, again, this is
16 TURN-13, Attachment 1.

17 A Is that part of your intervenor testimony or
18 the cross-exhibits?

19 Q It's part of TURN's testimony, but it's the
20 attachment volume not the testimony there.

21 A Could you state the title of the exhibit.

22 Q The page or the exhibit?

23 A We're -- I'm -- we're trying to find the item
24 that you would like us to reference. So --

25 Q So the exhibit number is TURN-13-Attachment 1.

1 It's called Attachments to the Prepared Testimony of
2 David Cheng. The page we're looking for is the very
3 last page, which is a PG&E workpaper. The title on the
4 top says, "Application for Comprehensive Gas Advanced
5 Metering Infrastructure Replacement Program."

6 A Yes, I'm looking at an electronic version I
7 have, TURN-13 testimony, and I'm gonna see if there's an
8 attachment in that.

9 Q The attachments are a separate exhibit. They
10 are not in the same exhibit.

11 A They are not in the same. Bear with us for one
12 second.

13 Gustavo, do you seem to have that one?

14 WITNESS CASTILLO: Let me check the record.

15 WITNESS CONSOLE: We have the workpapers that
16 were submitted as part of the intervenor testimony.
17 What we don't seem to have is the attachment here.
18 We're looking for it.

19 MR. CHENG: Mr. Lewis, I'll note that TURN
20 specifically noted the exhibits we would be referencing
21 on Friday's email service.

22 WITNESS CONSOLE: I have those -- I have those
23 exhibits if it's the one that was referenced on Friday.

24 BY MR CHENG:

25 Q Do you have in front you TURN

1 Exhibit 13-Attachment 1?

2 A Okay. Yeah. I'm looking in my binder. I have
3 TURN Exhibit 13 attachments. What's the attachment? Is
4 that the -- is that the prepared testimony of Jalal
5 Awan?

6 Q TURN-13 is testimony for David Cheng.

7 A I'm trying to locate the attachment that you
8 want us to find.

9 MR. CHENG: Your Honor, should we go off the
10 record?

11 ALJ FOX: We are off the record.

12 (Off the record.)

13 ALJ FOX: We're back on the record.

14 MR. CHENG: All right. Thank you, your Honor.

15 BY MR CHENG:

16 Q So on this page, this is the workpaper from
17 PG&E's Application 24-03-011 showing the number of gas
18 modules to be replaced between 2023 and 2030 broken up
19 by the two applications.

20 Do you see that?

21 WITNESS CONSOLE: I do.

22 Q We see here that the total modules to be
23 replaced -- and this is on the far-right column near the
24 bottom -- it says, "2,875,893 meters -- modules to be
25 replaced."

1 Do you see that?

2 A I do.

3 Q And with 1.675 to be replaced in the gas AMI
4 application and 1.2 during the GRC.

5 Do you see that?

6 A I do.

7 Q Okay. Now I'm going to ask you to please keep
8 this page handy, because we will be referring back to
9 this page. PG&E ended up settling the case, Application
10 24-03-011, with TURN, Cal Advocates and SBUA for a total
11 capital expenditure of \$420 million; is that correct?

12 A Yes, that is correct.

13 Q Okay. Can we go back to your -- to the direct
14 testimony, which is Exhibit 6, page 8-2.

15 A Yes. We're on that page.

16 Q Okay. Here on footnote 5, you state that PG&E
17 updated the forecast for 2023 to 2026 replacements to
18 1.6 million units.

19 Do you see that?

20 A I do.

21 Q And then on lines 8 to 13, you state that as a
22 result, PG&E will replace 1.3 units -- 1.3 million units
23 from 2027 through 2030; is that correct?

24 A That's correct.

25 Q Okay. Now I'm going to ask you to turn to your

1 workpapers for this exhibit. So it's going to be
2 Exhibit 6 workpapers, page WP 8-11. So, again, that's
3 page WP 8-11.

4 A Yes. Thank you, Mr. Cheng. I'm going to look
5 up the electronic version, because it's easier to read
6 in some larger font. Yes, I have 8 -- Workpaper 8-11
7 here.

8 Q Okay. Thank you. So here on line 16, you
9 state that the total gas module replacement for 2027
10 through 2030 is 1,389,258 units; is that correct?

11 A That's correct. That reflects total le- --
12 total modules to be replaced, which includes legacy gas
13 modules and a subset of next generation Series 3000 gas
14 modules. So that is correctly reflecting the total.

15 Q Okay. So we just saw your testimony where you
16 stated that PG&E will replace approximately 1.3 million
17 gas modules. Could you tell us what rounding
18 methodology did you use to equate 1,389,258 with
19 approximately 1.3 million?]

20 A The approximate methodology on that is the fact
21 that we forecasted -- PG&E forecasted to replace
22 approximately 100,000 modules more than what we stated
23 in our workpaper 2-2 that you had just cited from our
24 application. That figure was 1,200,487. And that count
25 related particularly to PG&E's legacy gas modules, which

1 was the title of that workpaper. So, from that starting
2 point, we forecasted to replace approximately 100,000
3 more legacy gas modules in this GRC period.

4 We also removed a subset of modules, about
5 51,000 modules, that are replaced through the company's
6 normal gas meter maintenance program, so that we're not
7 durable counting the funding request. And then, we add
8 back about 163,000 Series 3000 newer-generation modules
9 that are also being replaced during this GRC period;
10 however, not really the main focus. As we said, legacy
11 modules was the main focus. That all nets to 1,389,258
12 modules -- amounting to that total -- that value you're
13 referencing, Workpaper 8-11 to 8-12, line 16.

14 That's how it rounds. I realize it's complex.
15 And thank you for providing me the opportunity to
16 clarify.

17 Q Yeah. Thank you. Honestly, I didn't follow
18 that at all, but -- so let me clarify my question.

19 Are you saying the 1.3 million in your
20 testimony is different from the 1.385 million in your
21 workpaper? I mean, one point -- I'm sorry. Let me
22 correct that -- 1.389 million in your workpaper, are you
23 saying those two are different?

24 A I'm saying the 1.389258 (sic) total modules
25 forecasted for replacement in Workpaper 8-11 to 8-12, on

1 line 16, reflects all legacy gas modules that we plan to
2 replace and a subset of newer generation Series 3000
3 modules, which were not counted in the previous
4 workpaper that you had referenced, Workpaper 2-2. And
5 that's the difference that I was trying to explain for
6 you.

7 Q So you're saying that those -- those are not
8 referring to the same things? The 1.3 million and the
9 1.389 are not referring to the same things?

10 A I'm saying the 1.389 reflects PG&E's plan to
11 replace the remaining legacy gas modules in the system
12 and a smaller subset of Next Generation Series 3000
13 modules.

14 Q I'm trying to understand, are they the same --
15 are you referring to the same thing or not? Are they --
16 is that workpaper --

17 A What's --

18 Q -- referring to the same thing as the
19 1.3 million in your testimony?

20 A So, I just clarified the 1.389. Can you tell
21 me the other figure that you would like me to -- can you
22 restate what you would like me to verify? What's --
23 where is the 1.3 you're getting from?

24 Q In your testimony, on that page we just looked
25 at --

1 A Mm-hm.

2 Q -- page 8-2, from lines 8 to 13 --

3 A Yeah.

4 Q -- you referenced a 1.3 million unit. I'm
5 trying to understand --

6 A Yes.

7 Q -- is that 1.3 the same or different than the
8 1.389?

9 A I appreciate that. Let me --

10 (Reporter clarification.)

11 WITNESS CONSOLE: Yes. Thank you.

12 Mr. Cheng, yes, on opening testimony page 8-2
13 that you had cited for us, line 11, and it says here --
14 I will read from line 8 to 11:

15 Accordingly, PG&E's Gas A-9 program will
16 continue this necessary work through the GRC
17 period, including the replacement of company --
18 the company's remaining, approximately,
19 1.3 million legacy gas modules.

20 I am trying to make a differentiation that the
21 term "legacy gas modules" refers to our first-generation
22 modules. And that's an accurate statement.

23 Now, the workpaper that we have cited,
24 Workpaper 8-11 to 8-12, which cites the total modules
25 for replacement 1.389258, that includes mostly the

1 legacy modules and some Next Generation Series 3000
2 models for replacement here. So, both statements are
3 correct.

4 Q Can you point us to, whether your testimony or
5 your workpapers, that we would be able to tell how many
6 legacy modules are being replaced out of that 1.389
7 figure?

8 A Can you restate your question?

9 Q So you just testified that the --

10 A Mm-hm.

11 Q -- 1.839 includes non-legacy modules.

12 So can you tell us where we can find the number
13 for the number of legacy modules being replaced?

14 A Yes, I can. So the 1.3 is rounded up. I will
15 refer you to our opening testimony, page 8-9. Let me
16 know when you're there.

17 Q Yes, I'm here.

18 A Okay. And I'll also refer you to page 8-10 on
19 the next page. So we'll start with Required Maintenance
20 on Table 8-2 on page 8-10. As we can see from that
21 table, the majority of required maintenance forecasted
22 for replacement is the legacy modules.

23 Do you see that on line 1?

24 Q I don't know what you mean by "majority." I
25 see line 1 says "Replacement of gas modules."

1 A I'm referring to Table 8-2. Line 1 of that
2 table: The total forecasted legacy gas modules for
3 replacement under required maintenance is 866,585.

4 Q Okay. I see it.

5 A Okay. So, we take that figure. Now, we add
6 the life cycle modules -- the limited life cycle
7 replacement modules that are also going to be replaced.
8 That figure is on page 8-9. Table 8-1 of that page,
9 line 1 in the middle column, where it says, "Life cycle
10 replacements," do you see where it says 340,000 gas
11 modules?

12 Q Yes.

13 A Okay. So, we -- I'm going round, for this
14 exercise, 867,000 -- or 867- plus 340,000. That gets us
15 to roughly one 1.2 million gas modules. Now,
16 additionally, as I mentioned, we have a certain amount
17 of modules that are replaced under the company's gas
18 meter maintenance program, or Exhibit 6, Chapter 7. And
19 that volume forecasted in this rate case period is
20 50- -- is 50,857, or I'll just round to 51,000. And
21 that can be referenced on PG&E's Workpaper 8-65, a more
22 detailed workpaper all the way on Row 1,346. Adding
23 these three figures, we get to a roundup to 1.3 million
24 modules, to answer your question.

25 Q Okay. Thank you for that.

1 So to summarize what we just went through, you
2 are stating that comparing what we're looking at, in
3 terms of the workpaper for PG&E's Gas AMI Application,
4 and comparing the math we just went through, PG&E is
5 replacing approximately a hundred -- a 100,000 fewer gas
6 modules from 2023 to 2026, as compared to its forecast
7 in the Gas AMI Application; is that correct?

8 A That was the forecast at the time; and that is
9 correct.

10 Q Okay. All right. Let's move to -- we'll stay
11 in your testimony, direct testimony, and we'll go to
12 page 8-5, please.

13 A Yes. We are there.

14 Q So here in your -- in your testimony --
15 (Reporter clarification.)

16 MR. LEWIS: Apologies.

17 MR. CHENG: Sure. No problem.

18 Q On this page, on Figure 8-2, you have the
19 capital expenditures for 2023 to 2030.

20 Do you see that?

21 A I do.

22 Q And if we add up the figures for 2023
23 through 2026, it totals 429.98 million, which I
24 understand you revised to 420 million in your rebuttal;
25 is that correct?

1 A So, the 2022 through 2026 added up in figure
2 8-2 did total to 429 billion; because that was the
3 forecast at the time of our filing of the GRC in May
4 2025. Subsequently, as you referenced, the 420 million
5 was a result of a settlement that was approved by the
6 CPUC in December. And we are prepared to meet the 2023
7 to 2026 forecast within those amounts.

8 Q Okay. Now, to clarify, you filed this
9 testimony after PG&E already entered into a settlement
10 agreement for 420 million; is that correct?

11 A Several months after, yes. That is correct.

12 Q Okay. So here, you are forecasting the full --
13 we won't get into whether it's 420- or 429- at the time
14 of your testimony -- yet, you are forecasting 100
15 thousand fewer gas modules for the same period.

16 Did you explain in your testimony why PG&E is
17 reducing its forecasted module replacements by keeping
18 the same forecasted capital expenditure?

19 A Can you repeat that question, Mr. Cheng?

20 Q Sure.

21 A Yeah.

22 Q So, setting aside whether it's 429- or 420- --

23 A Mm-hm.

24 Q -- can you -- did you explain in your testimony
25 why you're forecasting for the full amount, or even

1 exceeding the amount of the settlement, while
2 forecasting a reduced module replacements of
3 approximately 100,000 thousand?

4 A I don't believe we explained that in direct
5 testimony. But we did explain it in our rebuttal
6 testimony in response to intervenor testimony and
7 comments.]

8 Q Okay. So when you decided to forecast fewer
9 replacements while forecasting the same or greater
10 amount, did you notify the settling parties for the
11 Commission that you were going to do that?

12 A No, we did not. That was not a requirement.

13 Q Okay. Have you ever entered into a contractual
14 agreement with another party whether in your
15 professional life or your personal life?

16 A For purposes of company matters, I've not
17 entered into a contractual matter previous to this
18 settlement.

19 Q Have you entered into a contractual agreement
20 in your personal life?

21 A Yes, I have.

22 Q So once parties have entered into a contractual
23 agreement, do you think it's reasonable for one party to
24 decide that they will change -- they will charge the
25 other amount that's -- I'm sorry. Let me rephrase that.

1 Once parties have entered into a contractual
2 agreement, do you think it's reasonable for one party to
3 decide that they will charge the other party the same
4 amount but for less work without seeking the agreement
5 of the other party or at least notifying the other
6 party?

7 MR. LEWIS: Objection, your Honor, lacks
8 foundation, calls for speculation. Mr. Console directed
9 counsel for TURN to PG&E's rebuttal testimony where we
10 address the certain timing. Perhaps it would be
11 beneficial to go to that area of testimony.

12 ALJ FOX: Mr. Cheng, would you like to respond
13 to that?

14 MR. CHENG: Sure, your Honor. I'm trying to
15 follow up to Mr. Console's statement that PG&E was not
16 required to notify the settling parties of their change
17 in scope. I'm trying to understand if PG&E believes
18 that's reasonable.

19 ALJ FOX: I see a foundation for it, but I'd
20 like you to rephrase the question.

21 BY MR. CHENG:

22 Q Sure.

23 Mr. Console, do you believe that it's
24 reasonable for a party in this agreement to change the
25 scope of work while keeping the amount the same without

1 notifying the other parties in the agreement?

2 MR. LEWIS: Objection, your Honor. Counsel is
3 testifying and mischaracterizing PG&E's testimony. PG&E
4 addressed the issue of the forecast and the timing of
5 the GRC filing in its rebuttal testimony.

6 ALJ FOX: Objection sustained.

7 Please move on, Mr. Cheng.

8 BY MR. CHENG:

9 Q All right. Let's move on. Why don't we go
10 with that.

11 Mr. Console, can you explain why you believe it
12 was not reasonable for PG&E to notify the parties?

13 MR. LEWIS: Objection, your Honor. This is
14 speculative and doesn't seem to elicit facts, which is
15 what Mr. Console and Mr. Castillo are here for.

16 MR. CHENG: Your Honor, I'd like to understand
17 which part of that is speculative.

18 MR. LEWIS: Mr. Console and Mr. Castillo are
19 here to provide facts. These have been addressed in
20 PG&E's rebuttal testimony.

21 MR. CHENG: They're free to point to the
22 testimony if they believe it's been addressed.

23 ALJ FOX: Mr. Cheng please move on to your next
24 question. The objection has been sustained.

25 ///

1 BY MR. CHENG:

2 Q All right. Let's look at what's been labeled
3 Exhibit TURN-203. If you can pull up that exhibit.

4 WITNESS CONSOLE: We have the exhibit,
5 Mr. Cheng.

6 MR. CHENG: If you would like me to do that or
7 are you comfortable going straight into the exhibit?

8 Mr. Lewis?

9 MR. LEWIS: I think some foundation is
10 appropriate here.

11 BY MR. CHENG:

12 Q Okay. Let's do that. Let's go back to your
13 rebuttal testimony then, Exhibit 18, page 8-17.

14 WITNESS CONSOLE: Okay. We're on the rebuttal
15 testimony, page 8-17, Mr. Cheng.

16 Q So I'm going to start from line 4. You stated
17 that TURN's capital unit cost recommendations suffer
18 from the same flaws as its expense unit cost
19 recommendation. And then you listed three flaws that
20 you believe existed, which I'll summarize as treating
21 the entire cost as variable costs, no adjustment for
22 escalation and inflation and that the 420 million was
23 the settlement figure; is that correct?

24 A That summary is correct.

25 Q So now let's look at TURN-203 that we just

1 referenced. In this data request, TURN asked you to
2 calculate the unit cost by accounting for the first two
3 flaws that you identified; is that correct?

4 A That's correct, that's what the response
5 stated.

6 Q If we can, take a look at the last page.

7 A Page 2?

8 Q Yes. So that -- actually, it's the last page
9 of the spreadsheet, which I don't believe has a page
10 number, but it's the last page of the exhibit.

11 A Okay.

12 Q So this is your analysis of the unit cost for
13 the reduced forecast in your rebuttal. We see a total
14 of \$420 million on line 25 with a total replacement of
15 1.289 million units on line 22; is that correct?

16 A Can you repeat that.

17 Q Sure. On line -- this is an analysis of the --

18 A Yes.

19 Q -- unit cost --

20 A Yes.

21 Q -- for the reduced forecast.

22 A Yes.

23 Q And you see 420 million on line 25, and then
24 the 1.289 million replacement on line 22; is that
25 correct?

1 A Oh. I see 1.289 million units on line 24.

2 Q Okay. Maybe I mislabeled it. I'm sorry. I
3 apologize. But do you see that?

4 A I see the units on line 24.

5 Q All right. And so on line 23, you calculated
6 the variable cost per unit to be \$303.17; is that
7 correct?

8 A That's correct.

9 Q Now we're going to go back one page --

10 A I'm sorry. Can you go -- what was that? I
11 didn't see that on this spreadsheet. Where did you get
12 that number? Where did you get the 322?

13 Q No. 303.17 on line 23.

14 A Do you see that?

15 WITNESS CASTILLO: It's on the second page.

16 WITNESS CONSOLE: Oh, it's on the second page.

17 Okay. Yeah. I see that David -- Mr. Cheng.

18 BY MR. CHENG:

19 Q Okay. No problem. So on the previous page --
20 now we're going to go back to the first excel page.

21 Here on the column titled "As adopted in D.25-12-29,"

22 you calculated the unit cost for that decision --

23 adjusting for escalation and fixed cost -- to be 269.27

24 on line 14; is that correct?

25 MR. LEWIS: Your Honor, if I may interpose an

1 objection here. I would just note that to the extent
2 counsel's questions are predicated on values from a
3 settlement in the previous application for the Gas AMI
4 Program that covered 2023 to 2026. That settlement was
5 a compromise of litigation positions and also by its
6 explicit terms is not to be relied on as precedent. So
7 I would like to just interpose that objection here to
8 the extent that the conversation takes that direction.

9 ALJ FOX: Noting that preemptive objection.

10 Before we move on, I'd just like to note that
11 our witnesses -- there's a lot of audio feedback from
12 paper shuffling. So to the extent that you can keep
13 papers far from the microphone, I know our court
14 reporter would appreciate that.

15 Mr. Cheng, you can continue.

16 MR. CHENG: Thank you, your Honor.

17 Q I'll repeat the question. On this page on the
18 column titled "As adopted in D.25-12-029," you
19 calculated the unit cost for the replacement after
20 adjusting for escalation and fixed costs to be \$269.27
21 per unit; is that correct?

22 WITNESS CONSOLE: That is the average unit cost
23 based on the settlement but not PG&E's forecasted unit
24 cost.

25 Q Yes. Understood. And PG&E has repeated the

1 same objection numerous times, so we acknowledge that.
2 I mean since you used the word "precedent" multiple
3 times in your testimony and in this data response that
4 we're looking at, what is your understanding of what
5 "non-precedential" means?

6 MR. LEWIS: I would object to the extent that
7 calls for a legal conclusion.

8 ALJ FOX: Sustained.

9 MR. CHENG: Your Honor, the witness used the
10 word multiple times in his testimony, so I must be able
11 to ask about it, otherwise it needs to be stricken from
12 the testimony.

13 ALJ FOX: I will allow it because it was in
14 testimony only. But the question must be limited to the
15 way that it was appearing in the testimony, not
16 generally.

17 MR. CHENG: Okay. If it helps, your Honor, we
18 can go to the exact section of the testimony. Would
19 that be helpful?

20 ALJ FOX: That would help set a foundation,
21 yes.

22 BY MR. CHENG:

23 Q Okay. If you could turn to page 8-12 of your
24 rebuttal testimony.

25 WITNESS CONSOLE: We're on page 8-12,

1 Mr. Cheng.

2 Q So we're starting on line 13. You state, "The
3 settlement agreement specifically includes a provision
4 that it is non-precedential."

5 Do you see that?

6 A I see that starting on line 13 and ending on
7 line 29.

8 Q Well, your sentence is 13 to 14, and then
9 you're citing a section from the settlement agreement
10 that goes all the way to 29; is that correct?

11 A That is correct.

12 Q You state that they include the provision that
13 it is non-precedential. So my question to you is what
14 is your understanding of what "non-precedential" means?

15 A My understanding of it is based on as it was
16 written in the settlement agreement, and we specifically
17 cited that entire language on lines 15 through 28. It's
18 my understanding of it is as it is written.

19 Q I'm not asking what you're citing. I'm asking
20 your understanding of what "non-precedential" means
21 because you use that term in your testimony.

22 A So based on the description, this settlement
23 agreement is not intended by the settling parties to be
24 precedent for any other proceeding. I mean based on the
25 language, my understanding is that the settlement

1 agreement terms and particulars isn't to be used as a
2 precedent for future matters. That's my general
3 understanding.

4 Q Well, let me phrase it this way: Is your
5 understanding of "non-precedential" -- does it mean that
6 it's not controlling or binding for future cases or does
7 it mean that parties cannot reference to it at all?

8 A Can you rephrase that.

9 Q Sure. Does non-precedential mean to you that
10 it's not controlling or binding for future cases or does
11 it mean that it cannot be referenced by parties at all?

12 A The first lines of this page 8-12, lines 16 and
13 17, it simply states, "The settlement agreement is not
14 intended by settling parties to be precedent over any
15 other proceeding." That's the first sentence and
16 that's -- I would interpret it as such. But it has more
17 language at the bottom of this section.

18 Q Okay. So is it fair to say that you are not
19 sure whether it means -- that it's not binding or
20 controlling or whether it means it cannot be referenced
21 at all?

22 Would that be a fair statement?

23 A As I addressed in rebuttal testimony, our
24 forecast for General Rate Case 2027, particularly to the
25 Gas AMI replacement, we believe is consistent with the

1 settlement, and we addressed this topic in rebuttal.

2 Q Let's move on. So we are going to go back to
3 where we were looking at TURN-203. On this column
4 titled "As adopted in D.25-12-029," you calculated that
5 if we adjust it for escalation and fixed costs, the unit
6 costs will be \$269.27; is that correct?

7 A That's correct. That is the average settlement
8 unit cost adjusted for escalation and inflation.

9 Q Okay. And if we apply the same 269.27 to this
10 application, which you did below, lower on the page, the
11 result would be 376 million .339 -- I'm sorry -- 376.339
12 million; is that correct?

13 A That's correct.

14 Q Now, if we can look at Exhibit TURN-204.

15 A We have the exhibit.

16 Q If you can look at the last page first. Here,
17 TURN took the same spreadsheet that we were just looking
18 at and modified it to reflect a total replacement of 1.2
19 million units instead of the 1.289 million units that
20 you used in your spreadsheet keeping the same variable
21 cost that you derived of \$303.17.

22 Do you see that?

23 A I do.

24 Q TURN provided the spreadsheet last Friday so
25 parties can confirm the formulas. Are you able to

1 confirm that nothing else changed on this spreadsheet
2 other than changing the number of units being replaced?

3 A Based on my understanding, all other
4 assumptions in that spreadsheet remained the same except
5 for the volume of units where you have adjusted to
6 include one million 209 modules which, as we stated
7 earlier in this rebuttal, was only a reflection of
8 legacy gas modules where our units, one million 389, was
9 a net of all legacy modules plus additional series 3,000
10 module replacement reflecting accurately all units to be
11 replaced, so it is correct.

12 Q Okay. So now the previous page -- we'll go
13 back to the page before -- which is the first page of
14 the spreadsheet. I repeated the same exercise there
15 modifying the spreadsheet to replace the 1.289 million
16 with the 1.2 million figure. If we do that, I end up
17 with 352.436 million.

18 Do you see that?

19 A Yes. I see your calculation of 352 million
20 using the volume of 1.2487 modules, which does not
21 reflect all modules that need to be replaced, and that
22 does amount to 352 million.

23 Q So were you able to confirm also that nothing
24 else changed on this spreadsheet other than the units to
25 be replaced?

1 A I did not look at a detailed Excel formula by
2 formula. I only had a day to do that. But in general,
3 the calculations look correct. I just did not go cell
4 by cell to look at formula correctness. It looked
5 fairly accurate based on one day's notice or two days'
6 notice.

7 Q Okay. Let's move on for --

8 ALJ FOX: Mr. Chen?

9 MR. CHENG: Yes, your Honor.

10 ALJ FOX: I'm looking for an opportunity to
11 take a ten-minute break just to give some breathing
12 room. Curious if I'm interrupting your flow at this
13 point or if you'd like to finish your thought and then
14 we should take the break.

15 MR. CHENG: No, your Honor. Now would be
16 perfectly fine.

17 ALJ FOX: In that case, let us go off the
18 record and return at 11:00 o'clock.

19 (Off the record.)

20 ALJ FOX: Let's go back on the record.

21 Mr. Cheng, you may continue your questioning.

22 MR. CHENG: Thank you, your Honor.

23 Q We're going to go back to your direct
24 testimony, please, Exhibit 6. Look at page 8-2.

25 WITNESS CONSOLE: We have page 8-2 of the

1 direct testimony.

2 Q Okay. Line 15 here you're describing the
3 benefits of the Gas AMI Program. I'll just read a quick
4 quote:

5 In recent years, PG&E has focused on
6 maintaining the system's core functionality
7 while enabling enhanced AMI capabilities and
8 mitigating expected technology obsolescence and
9 discontinue vendor support of legacy systems.
10 Newly available advanced technologies will
11 enable PG&E to lower customer costs through
12 operational efficiencies, as well as the
13 improved customer service, enhance public
14 safety and events, environmental benefits.
15 Do you see that?

16 A I do see the statement in our page 8-2.

17 Q Okay. So as part of that last sentence, you
18 state that enhancing public safety is one of the
19 benefits of this project; is that correct?

20 A That's not really correct. This program here
21 is the comprehensive replacement of the AMI system.
22 What this sentence says on line 18 is -- or the last --
23 I'm reading line 18, second sentence of that. It says:

24 Newly available advanced technologies will
25 enable PG&E to lower customer costs through

1 operational efficiencies, as well as to improve
2 customer service and enhance public safety.

3 So in this context, the AMI system replacement,
4 when coupled with advanced technologies that can be
5 installed in the future -- in that context it would
6 enhance public safety. But this project by itself
7 without those newer technologies, which is not the scope
8 of this application, wouldn't do that by itself.

9 Q Okay. But you need the AMI 2.0 meters to take
10 advantage of those advanced technologies; is that
11 correct?

12 A AMI 2.0 meters is a broad terminology. Could
13 you be more specific.

14 Q Sure. Let's rephrase it this way: Without
15 replacing the legacy 1.0 meters with the new meters that
16 PG&E is proposing, you would not be able to take
17 advantage of these advanced technologies that you are
18 citing here; is that correct?

19 A This application proposes to replace gas
20 modules mainly and to perform systems upgrades. There
21 is nothing in here that references replacing with a
22 newer two-data gas meter or meters.

23 Q So you're saying that this program is not a
24 part of upgrading Gas 1.0 to Gas 2.0 AMI?

25 A Can you rephrase that or restate the question.

1 Q Sure. Let's do it this way: Are you saying
2 that the \$420 million that PG&E is asking for this
3 program is not part of the upgrade from Gas AMI 1.0 to
4 Gas AMI 2.0?

5 A I'm not saying that. I'm saying that the Gas
6 AMI Program can be very broad. Again, this work is a
7 continuation of work that we started in 2023 with
8 application 243.11. And in this context, we had a whole
9 technology road map that outlined benefits of an AMI
10 upgraded system with the newer technologies. Those
11 newer technologies are not included in this
12 application.]

13 Q Okay. So do you believe that the \$420 (sic)
14 that PG&E is asking for will enhance public safety?

15 A Did you mean to say \$420 million as part of the
16 settlement?

17 Q No. \$420 (sic) that you're asking for in your
18 rebuttal testimony. Do you believe that that amount
19 that PG&E is asking for will result in enhanced public
20 safety?

21 A I wanted to make sure we have the facts. Our
22 rebuttal testimony, I believe, had a concession that
23 netted to about 411 or 414 million. That was the
24 rebuttal testimony. I'm just trying to understand
25 where -- where you got the 420 million from.

1 Q The -- okay. The 420 I was using is the figure
2 we were looking at for the replacements. So, you know,
3 if -- are you -- what's the 411 you're referring to?

4 A Well, can you -- can you -- can we -- can we go
5 to a specific page where it says "420" that you're
6 referencing so I can answer your question?

7 Q Sure. Okay. Let's look at TURN- -- TURN-203.
8 TURN-203. Do you recall we were looking at the very
9 last page, which is the Exel spreadsheet?

10 A I have that spreadsheet.

11 Q So the column 2027 through 2030, at the very
12 bottom here, the \$420 million, that's the number I'm
13 referring to, which it says is the sum of the fixed and
14 variable costs for your rebuttal position.

15 Is that not an accurate number that I'm looking
16 at?

17 A So -- yeah. So on this spreadsheet, the second
18 page, Mr. Cheng, the 420 million -- what is referenced
19 here is PG&E making a concession on the cost to replace
20 100,000 modules in this GRC period which lowered the
21 overall forecast to 420, but that was one of two
22 concessions. In our rebuttal testimony, we also had a
23 concession to remove the cost to replace network data
24 collection units, and when we combine those two
25 concessions, our rebuttal testimony concession forecast

1 is approximately 414 million.

2 Q Okay. Let's -- whether we want to look at, you
3 know, combined or standalone, do you believe that
4 spending that amount of capital expenditure will enhance
5 public safety as one of the benefits?

6 A PG&E's plans in the future may include newer
7 metering technologies that when leveraging the system
8 can enhance public safety.

9 Q Okay. So are you familiar with what's called
10 the deferred work settlement?

11 A I believe we are.

12 Q I'm sorry. There's some noise. Can you repeat
13 that.

14 A Can you explain that again?

15 Q No. I'm sorry. Is your answer you are not
16 familiar with it, or you are familiar with it?

17 A I think there can be different interpretations
18 of what that is. Do you want to specify for us what
19 that could be?

20 Q Sure. Let's take a look at the PG&E exhibit
21 that I also referenced in the Friday email, Exhibit 2.
22 So if we look at PG&E Exhibit 2, page 2-23.

23 MR. LEWIS: I'm sorry, your Honor. That --
24 that's the entirety of PG&E Exhibit 2. Is there a
25 specific chapter reference?

1 MR. CHENG: Mr. Lewis, I'm referencing
2 page 2-23.

3 MR. LEWIS: Same thing. Okay.

4 WITNESS CONSOLE: What is it we're referencing,
5 Mr. Cheng? We're looking up the document.

6 BY MR. CHENG:

7 Q PG&E-02, page 2-23.

8 A We are trying to get that. There's many, many
9 pages to this.

10 Q It's on page 149 of the PDF, if that helps.

11 A Thank you. We're still -- we're still
12 scrolling down.

13 WITNESS CASTILLO: 149.

14 WITNESS CONSOLE: And what's the bottom of the
15 page number, Mr. Cheng?

16 Q 2-23.

17 A Okay.

18 Q Are you there?

19 A Yes.

20 Q Okay. So on line 17 here, I'm weary about
21 reading, because I had a previous ALJ that was not happy
22 when people read right from the -- so if you'll just
23 look at line 17 and look at that paragraph starting
24 with:

25 In the 2023 GRC decision, the Commission

1 directed PG&E to make a showing on deferred
2 work and so on and so on.

3 Take a look at that paragraph.

4 A Lines like -- what line? 17 through --

5 Q 17 to 25.

6 WITNESS CASTILLO: Okay.

7 WITNESS CONSOLE: We can see it.

8 Q Okay. So the three conditions that's outlined
9 here, would you agree that the reduced volume
10 replacements for years 2023 to 2026 would satisfy these
11 three criteria?

12 A No, we do not.

13 Q And why not?

14 WITNESS CASTILLO: Line 20 of page 2-23 states
15 the work was requested and authorized based on
16 representations that is needed to provide safe and
17 reliable service. The assets in question in our
18 co-sponsored chapter do not directly impact safer
19 reliable service. They impact it indirectly.
20 Therefore, the first criteria here is not met.

21 Q Okay. So your testimony on the stand today is
22 that you believe PG&E does not need the replacement of
23 these Legacy gas modules in order to provide safe and
24 reliable service; is that correct?

25 A We believe these assets and the asset

1 replacements will enable the technology in the future to
2 increase safety and reliable service.

3 Q Is that a "yes" or "no"? I'm not understanding
4 the answer. The question is: On the stand here today,
5 is your testimony that the replacement of these gas
6 modules is not necessary to provide safe and reliable
7 service?

8 A No.

9 Q Okay. Let's move on. We're going to turn back
10 to your direct testimony, which is Exhibit 6. Please
11 let me know when you're there.

12 WITNESS CONSOLE: Our direct testimony?

13 Q Yes. Exhibit 6.

14 A Is there a chapter?

15 Q Yeah. Your chapter. Chapter 8.

16 A We have -- we have Exhibit 6, Chapter 8. Is
17 there a page number?

18 Q Yes. So we're going to look at page 8-5 again.

19 A Yes. We have that.

20 Q So we actually talked about this figure a while
21 back, and I'll just summarize. We added up the four
22 years, '23 to '26, and you agree that it added up to 429
23 million and then in rebuttal revised it to 420 million.
24 We were looking at this figure.

25 Do you recall that?

1 A The rebuttal wasn't a revised forecast. It was
2 the fact that we would honor the settlement figure of
3 \$420 million.

4 Q Okay. So earlier you had -- when I asked you
5 whether you have explained -- you had explained in your
6 testimony why you were forecasting the same capital
7 dollar amounts even though with reduced replacement
8 units, you responded by saying that you didn't explain
9 that in the direct testimony but you explained it in
10 your rebuttal testimony.

11 Do you recall that?

12 A I do recall what I said today.

13 Q Okay. Can you point us to your rebuttal
14 testimony where you explain that?

15 A I don't believe it's explained in detail from
16 that -- if that's your context.

17 Q Wherever you believe you explained that,
18 that's -- that would be fine. Could you point us to it?

19 A In our rebuttal testimony, we explain that we
20 had forecasted to replace the certain amount of gas
21 modules in the application and that our forecast has
22 been updated for this GRC. That's what we explained.

23 Q Maybe you misunderstood my question. So I'm
24 going to rephrase it. What I was asking you was that in
25 your testimony you have forecasted \$429 million of

1 capital expenditure for those four years even though you
2 indicated that you will be replacing fewer units than
3 previously forecasted.

4 My question to you was did you explain why you
5 were still forecasting the full amount or even exceeding
6 the full amount even though the forecasted work was
7 less?

8 A So I realize what I said earlier today, and the
9 correction on that is in the rebuttal testimony we've
10 explained that in GRC 2027 we've updated our forecast.
11 That's what I wanted to clarify we explained.

12 Q Okay. So you did not explain why you
13 forecasted \$429 million even though you were reducing
14 the replacement module.

15 A In our rebuttal testimony, we explain that that
16 was a function of timing between the various settlement
17 activities and when G -- when PG&E filed its GRC in
18 2027. We explained that in our rebuttal testimony.

19 Q You explained that's why you were making a
20 concession from 429 million to 420 million, correct?

21 A That's not correct. That's not a concession.
22 These were different points in time. We agreed to 420
23 million. That was not a concession. That was just a
24 point to be made.

25 Q Okay. My question is why did you forecast \$420

1 million in capital expenditures for those years when the
2 scope of work has been reduced by 100,000 units?

3 A Can you -- can you restate the question. I'm
4 not sure I understood the question. If you could
5 restate that.

6 Q Your testimony for capital expenditure forecast
7 covers 2023 through 2030. Now, for the years 2023
8 through 2026, it's a forecast, and you were forecasting
9 the full \$420 million even though you -- at the same
10 time, you were forecasting reduced scope of work by
11 \$100,000 -- I mean, 100,000 units; is that correct?

12 A I'm not sure I follow. In our Application
13 A.23-24.11 (sic), there was a forecasted amount of 480
14 million approximately for the period 2023 to 2026
15 amongst mainly to replace modules.

16 Q Okay.

17 A The 420 -- the 420 million was a settlement for
18 that same period. In GRC 2027, we forecasted, I
19 believe, 440 million with the additional 100,000 units
20 that were updated in the forecast, and through our
21 concessions, we lowered the amount to 414 million as
22 explained in our rebuttal testimony.

23 Q Okay. I think we're talking about different
24 things. Let me try again.

25 Look at your direct testimony, page 8-5. Here

1 you are forecasting \$429 million between 2023 to 2026.

2 Are we on the same --

3 A Let me -- I'm going to go back to that page.

4 Page 8-5?

5 Q Yes.

6 A Go ahead and repeat your question.

7 Q Here you're forecasting \$429 million of capital
8 expenditures between 2023 and 2026.

9 Do you see that?

10 A That was at the time of the GRC filing,
11 correct.

12 Q And at the time -- at the same time, in your
13 testimony, you also noted that PG&E is forecasting a
14 reduction of the scope of work during those four years.

15 A Can you point to -- can you point to where in
16 the testimony in rebuttal where we said that?

17 Q Not rebuttal. Your direct testimony.

18 A Can you show that?

19 Q Sure. Page 8-2, footnote 5. You note here
20 that your updated forecast for those four years is 1.6
21 million units instead of the 1.7 million units that you
22 stated on line 3 of that same page.

23 Do you see that?

24 A I do see that.

25 Q So my question is you're forecasting a reduced

1 scope of work for those four years. Why did you
2 forecast \$429 million of capital expenditure for those
3 four years?

4 A I'm not -- I'm not sure I'm following, but
5 these -- these forecasts were in different points in
6 time.

7 Q They are at the same time in your testimony.
8 I'm not sure if I understand what "different point in
9 time" means.

10 A Maybe you can -- maybe if I can ask you to
11 restate your question. I'm trying to understand your
12 question so I can answer it, but I'm not following your
13 question.

14 Q On page 8-5, you forecasted \$429 million of
15 capital expenditure for these four years. Yet on page
16 8-2, you state that you're forecasting a reduced scope
17 of work for these four years. So how do we reconcile
18 those two statements?

19 A So explaining -- so if I'm explaining the \$429
20 million that's on page 8-5 for the period '23 to '26,
21 that was our updated forecast at the time of the GRC
22 filing, which also included the additional gas modules
23 that you're referencing. I think that's part one of the
24 response for you.

25 And now can you state the second question? Was

1 it pertaining to the 420 million?

2 Q No. I'm -- okay. I'm not understanding your
3 response. There's no additional replacement units. You
4 had said in your testimony on page 8-2 you are now
5 forecasting fewer replacements between those four years,
6 but --

7 A I --

8 Q -- at the same time, you are forecasting 429
9 million of capital expenditure for those four years on
10 page 8-5. And I'm asking you why did you forecast 429
11 million when you were forecasting reduced scope of work?

12 A I don't follow your question, but those --
13 those facts were -- those forecasts were in different
14 points in time. They weren't in the same point in time
15 which I'm trying to explain to you.

16 Q But they're the same point in time in your
17 testimony. They are both in your testimony at the same
18 time.

19 A As explained, the GRC forecast, which is
20 aligned with Table 8-2 on page 8-5, was an updated
21 forecast that the company submitted with its GRC filing
22 in May 2025.

23 Q Did it account for the reduced units?

24 A The GRC 2027 forecast accounted for an --
25 increased units, which, I believe, answers the question,

1 correct?

2 Q No. We're not talking about 2027. We're
3 talking about 2023 through 2026. I'm asking you if the
4 forecast for specifically 2025 and 2026 accounted for
5 the reduced units?

6 A Did the forecast of 400 -- are you asking me
7 did the forecast of 429 million account for the reduced
8 units?

9 Q Correct.

10 A Again, the 429 million or the 420 million which
11 was -- that's a settlement amount. Regardless of how
12 many units were forecasted to be done, parties agreed to
13 a settlement.

14 Q Okay. Let me ask you this: How did you arrive
15 at the 429 million forecast?

16 A The 429 million forecast for 2023 to 2026?

17 Q Correct.

18 A As you can see on page 8.5, figure 8-2 in this
19 graph, that would be explained by having recorded 2023
20 and 2024 expenditures plus a 2025 and 2026 forecast.

21 Q So how did you arrive at the 2025 and 2026
22 forecast without considering how many units you were
23 going to replace during those two years?

24 A I'm not sure I follow your question.

25 MR. CHENG: Okay. Your Honor, I'm not sure --

1 I mean, it seems very straightforward to me. So --

2 ALJ FOX: Mr. Console, can you do your best to
3 answer the question as you understand it.

4 WITNESS CONSOLE: I will, your Honor. As I
5 understand it, we had used the recorded actuals of 2023
6 to 2024 and updated our forecast for '25 to '26 in
7 alignment with the GRC 2020 submission. That's how I
8 understand.

9 BY MR. CHENG:

10 Q How did you update the 2025 and 2026 forecast
11 without considering how much work is going to be done in
12 those two years?

13 A I believe we did consider it with the fact that
14 we used 2024 recorded actuals with this updated
15 forecast.

16 Q So you did not consider the reduced \$100,000 --
17 100,000 replacement units when you were forecasting 2025
18 and 2026; is that correct?

19 A I believe it's included.

20 Q You believe you considered -- you included the
21 reduction of the 100,000 units?

22 A I'm really trying to answer. This is a data
23 point I just -- I don't have available right here.

24 MR. CHENG: Your Honor, I don't want to waste
25 any more time. Can we ask PG&E to submit a supplemental

1 response to explain whether or not they accounted for
2 the reduced -- reduced volume in those two years of
3 forecast?

4 MR. LEWIS: Yes, your Honor. We can provide
5 that, if that's amenable to your Honor.

6 ALJ FOX: Yes. I think that would help us a
7 lot to clarify this matter. Thank you.

8 MR. CHENG: Thank you, your Honor. And -- I'm
9 sorry.

10 Q Okay. And just so -- just to wrap this up, the
11 reason I'm asking these questions is are you aware that
12 in Exhibit PG&E-10 the PG&E witness for the electric gas
13 and common plant is deeming the entire \$429 million used
14 and useful that you forecasted and therefore requesting
15 it to be included in the gas plans? Are you aware of
16 that?

17 A That's not an exhibit that I'm aware of or
18 responsible for.

19 MR. CHENG: Okay. Your Honor, for the record,
20 can I just point to that and read it into the record
21 real quick? It's only a short paragraph.

22 ALJ FOX: Yes. Go ahead.

23 MR. CHENG: Okay. So this is PG&E Exhibit 10,
24 Chapter 7, and there's a short paragraph on page 7-16.
25 Starting on line 4, it says:

1 Gas Advanced Metering Infrastructure or Gas
2 AMI Program: Capital expenditures for
3 maintaining, upgrading and replacing PG&E's Gas
4 AMI are included in the 2027 GRC. These costs
5 include upgrades to the Gas AMI that will
6 enable enhanced operational and safety benefits
7 including, the mitigation of technology
8 obsolescence and other market risks. On March
9 14th, 2025, all parties filed a joint motion
10 for adoption of a settlement agreement
11 resolving PG&E's Gas AMI application. PG&E has
12 accordingly included the applicable Gas AMI
13 recorded and forecasted costs in their 2027
14 GRC.

15 So this is the place where the gas plant
16 witness is asking for the forecast that Mr. Console
17 included in this testimony to be included in plant.
18 Okay. I won't ask Mr. Console any questions since he's
19 not aware of this testimony.

20 Your Honor, can I have a minute off the record
21 just to make sure I can wrap-up?

22 ALJ FOX: Yes. Let's take five and come back
23 at 11:40.

24 MR. CHENG: Thank you, your Honor.

25 (Off the record.)]

1 ALJ FOX: Very good. Okay.

2 Mr. Cheng, please continue.

3 MR. CHENG: Hi, your Honor. Thank you for
4 allowing me to review. I have reviewed. That's all the
5 questions I have of these witnesses.

6 ALJ FOX: Thank you.

7 Mr. Lewis, would you like to take additional
8 time to prepare for redirect, or are you ready to go?

9 MR. LEWIS: Your Honor, I appreciate that. I
10 could use, perhaps, another five minutes. But we'll be
11 ready soon.

12 ALJ FOX: Very good. Okay. Let's come back
13 then at 11:45. Will that give you enough time?

14 MR. LEWIS: Yes. Thank you, your Honor. I
15 appreciate it.

16 ALJ FOX: Very good. We'll be back at 11:45.

17 (Recess taken.)

18 ALJ FOX: We are back on the record.

19 Mr. Lewis, your witnesses.

20 REDIRECT EXAMINATION

21 BY MR. LEWIS:

22 Q I have a question for Mr. Castillo.

23 Counsel previously asked you -- and if I could
24 direct you to page 8.2 of your opening testimony?

25 WITNESS CASTILLO: I'm on 8.2.

1 Q Yes. Around line 18 through 21?

2 A Yes.

3 Q Okay. Can you clarify, please, your position
4 in terms of any potential safety benefits for this work?

5 A The position of our testimony is that this work
6 does not directly impact enhancing public safety.

7 Q And what do you mean by "directly"?

8 A The replacement of our module assets do not
9 have a direct result of enhancing public safety.

10 Q Do those replacements provide for future
11 potential for safety benefits?

12 A As stated in testimony, page 8-2, line 18,
13 newly available advanced technologies will enable PG&E
14 to lower costs through operational efficiencies, as well
15 as to improve customer service and enhance public
16 safety. Yes.

17 Q Okay.

18 Thank you, your Honor. No further questions.

19 ALJ FOX: Mr. Cheng, do you have any follow-up
20 questions?

21 MR. CHENG: Yes. I do, your Honor. Thank you.

22 ALJ FOX: Go ahead.

23 RE CROSS-EXAMINATION

24 BY MR. CHENG:

25 Q So, Mr. Castillo, I believe your redirect was

1 based on when you were discussing the deferred work
2 settlement criteria. So I'm going to point you to that
3 again and ask you if you are -- whether changing your
4 response or clarifying your response.

5 So, this is PG&E Exhibit 2, page 2-23. Let me
6 know when you're there.

7 WITNESS CASTILLO: I'm on Exhibit 2, 2-23.

8 Q Okay. So line 20, the first criteria of which
9 you said did not meet states: The work was requested
10 and authorized based on representation that it was
11 needed to provide safe and reliable service.

12 So, are you stating that the replacements of
13 these gas modules, or the program we're talking about in
14 Chapter 8, is not needed to provide safe and reliable
15 service?

16 Was that your testimony?

17 A Yes. That is correct.

18 Q Okay. And so, can you clarify what you mean
19 by: It's not directly related to safety, but indirectly
20 related to safety?

21 A As stated in testimony 8-2, Row 18:

22 Newly-available advanced technologies will
23 enable PG&E to lower customer costs through
24 operational efficiencies, as well as to improve
25 customer service, enhance public safety, and

1 advance environmental benefits.

2 So that is the indirect relationship requiring
3 future technologies.

4 Q So these meter -- these replacements are needed
5 indirectly to provide safe and reliable service, is that
6 what you're saying?

7 A Again, as stated on page 8-2, Row 18:

8 Newly-available advanced technologies will
9 enable PG&E to lower customer costs through
10 operational efficiencies, as well as to improve
11 customer service, enhance public safety, and
12 advance environmental benefits.

13 Q Mr. Castillo, I'm not asking you to repeat or
14 read your rebuttal testimony. We already have that on
15 the record. I'm asking you clarify your question.

16 Are you saying that these replacements are not
17 needed indirectly to provide safe and reliable service?

18 A They are needed indirectly in the future to
19 provide safe and reliable service.

20 Q Okay. So your position is that because they
21 are needed indirectly and not directly, and therefore
22 this criteria number one is not met; is that your
23 position?

24 A That is correct.

25 Q Do you see the word "directly" anywhere on this

1 criteria?

2 A I do not.

3 MR. CHENG: Thank you, your Honor. That's all
4 the questions I have.

5 ALJ FOX: Mr. Lewis, do you have any follow-up?

6 MR. LEWIS: No, your Honor. Thank you.

7 ALJ FOX: Thank you.

8 Before we move on, I would like to come back to
9 the question of supplemental testimony. As you may have
10 heard in previous sessions, the judges are putting
11 together a list of additional questions and can include
12 this request for supplemental testimony as part of that
13 list of questions going out within the next several
14 days.

15 TURN, I would like to hear a little bit more
16 about, specifically, what you're hoping to get in that
17 supplemental testimony?

18 MR. CHENG: Sure, your Honor. I think it's a
19 basic question. We're trying to understand whether PG&E
20 accounted for the reduced volume of work when they
21 forecasted their '25 and '26 capital expenditures for
22 these programs. And if so, show us how they accounted
23 for it. That's the gist of the question.

24 ALJ FOX: Thank you. Noted. And I will make
25 sure that gets into the list of questions for response.

1 With that, Mr. Console, Mr. Castillo, thank you
2 very much for your time today. You are excused.

3 And it's 11:54, so I think that this is a
4 natural time to take a break before our next set of
5 witnesses. But given that we have quite a bit before us
6 this afternoon, let's make it a 45-minute break and come
7 back at 12:40.

8 MR. CHENG: Your Honor?

9 ALJ FOX: Yes.

10 MR. CHENG: Oh, I'm sorry. Is it okay if we
11 move the exhibits relating to this cross into the record
12 first?

13 ALJ FOX: Thank you for that. Yes. Let's just
14 go ahead and do that. And we will figure out the time
15 to come back after we move those exhibits.

16 Please go ahead.

17 MR. CHENG: Thank you, your Honor.

18 So, TURN did not end up using TURN-205 as part
19 of the cross-examination. And that's part of the
20 position anyway. So we would like to move TURN-203
21 and -204 into the record.

22 MR. LEWIS: PG&E has no objection.

23 ALJ FOX: Very good. Those are moved into the
24 record.

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(Exhibit TURN-203 was received into
evidence.)

(Exhibit TURN-204 was received into
evidence.)

MR. CHENG: Thank you, your Honor.

ALJ FOX: Okay. So it is 11:55. That went
faster than expected, so let's come back at 12:40.

And we are off the record.

(At the hour of 11:55 a.m., a recess was
taken until 12:45 p.m.)

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AFTERNOON SESSION - 12:45 P.M.

* * * * *

ALJ LARSEN: We're back on the record.

Okay. Go ahead, Ms. Charipar.

MS. CHARIPAR: Thank you, your Honor.

PG&E calls its next panel to address the system hardening issues, witnesses Ms. Colvin and Mr. Ash.

ALJ LARSEN: All right. Thank you. Welcome, Ms. Colvin and Mr. Ash. Let me have you raise your right hands.

Do you swear or affirm under penalty of perjury that the testimony you're about to give in this proceeding will be the truth, the whole truth, and nothing but the truth.

WITNESS COLVIN: Yes, I do.

WITNESS ASH: Yes, I do.

ALJ LARSEN: And you agree to abide by the attorney -- witness attestations?

WITNESS COLVIN: Yes, I do.

WITNESS ASH: Yes, I do.

ALJ LARSEN: And I believe we asked that question of you, Ms. Charipar, already.

MS. CHARIPAR: Yes.

ALJ LARSEN: And Mr. Mitchell.

But, Ms. Fall, do you agree to abide by the

1 attorney attestations?

2 MS. FALL: Yes, I do.

3 ALJ LARSEN: Okay. Great.

4 And then -- go ahead, Ms. Charipar.

5 JULIE COLVIN and JAMES ASH,
6 called as witnesses by Pacific Gas and
7 Electric Company, having been sworn,
8 testified as follows:

9 MS. CHARIPAR: Thank you. So I'll first start
10 with my direct examination for Ms. Colvin.

11 DIRECT EXAMINATION

12 BY MS. CHARIPAR:

13 Q Could you please state your name and provide
14 your business address for the record?

15 WITNESS COLVIN: Yeah. My name is Julie
16 Colvin. Address is 300 Lakeside Drive, Oakland,
17 California.

18 Q Thank you. Can you just please introduce
19 yourself?

20 A Yeah. So, again, my name is Julie Colvin. I'm
21 currently the director of undergrounding regulatory
22 strategy for PG&E. In this role, I'm responsible for
23 leading our regulatory work related to system hardening
24 in our undergrounding programs, including preparing
25 filings responding to discovery and supporting our

1 clients with Commission and Energy Safety requirements.

2 I've been with PG&E for approximately 15 years
3 in a range of program management, business strategy,
4 operations, and regulatory positions in both our
5 customer and electric operations organizations. I have
6 a Bachelors in Environmental Studies from UC Santa
7 Barbara and a Masters in Environmental Management from
8 Duke University.

9 Q Thank you. Now, I would like to confirm the
10 testimony you are sponsoring in this proceeding. In
11 what has been marked for identification as Exhibit
12 PG&E-04, are you sponsoring Chapter 7 Wildfire System
13 Hardening Opening Testimony, including Attachments A and
14 B to Chapter 7, and the workpapers supporting Chapter 7?

15 A Yes, I am.

16 Q In what has been marked as Exhibit PG&E-12 are
17 you sponsoring your Statement of Qualifications?

18 A Yes, I am.

19 Q In what has been marked as Exhibit PG&E-16, are
20 you sponsoring Chapter 7, Wildfire System Hardening,
21 Sections C, D.1, D.2, D.5, and E, Rebuttal Testimony,
22 Chapter 7, Attachment E, Undergrounding Public Opinion
23 Research Summary, and the documents in Exhibit PG&E-16
24 Appendix A that relate to your sponsored rebuttal
25 testimony?

1 A Yes, I am.

2 Q In what has been marked as Exhibit PG&E-16, are
3 you co-sponsoring Chapter 7, Attachment A, PG&E's 2026
4 to 2028 Wildfire Mitigation Plan, Revision III Volume I,
5 Chapter 7, Attachment B, PG&E's 2023 to 2027 System
6 Hardening Work Plan as of March 1st, 2026, and Chapter
7 7, Attachment D, Energy Safety 2026 through 2028 Base
8 WMP Decision?

9 A I will note that you mentioned March 1st, 2026;
10 it's as of March 11, '26 --

11 Q Thank you --

12 A But, yes, I --

13 Q Thank you.

14 A -- am sponsoring those --

15 Q Thank you. All right.

16 What activities and programs does this
17 testimony cover?

18 A So my testimony addresses portions of our
19 system hardening program. Specifically, I am focused on
20 how and how much system hardening work is completed, as
21 it relates to our program delivery, the cost, and the
22 funding mechanisms.

23 Q Now, were these materials prepared by you or
24 under your supervision?

25 A Yes, they were.

1 Q Do you have any changes, corrections, or
2 additions you would like to make at this time?

3 A I do. In Exhibit PG&E-16, Chapter 7, at
4 page 7-20, line 7, the number should be 11 percent. In
5 other words, the sentence should read: Of this total
6 risk reduction, approximately 11 percent is due to
7 undergrounding.

8 Q Thank you.

9 A I do also want to note that while we do not
10 have any other further changes, corrections, or
11 additions at this time, I would note that our rebuttal
12 testimony, PG&E-16 -- Exhibit PG&E-16, we're responding
13 to intervenor testimony that was available to PG&E at
14 the time of our rebuttal submission. Both TURN and MGRA
15 have submitted errata after we could incorporate
16 responses within PG&E's rebuttal testimony. MGRA's
17 errata testimony appears to be in response to PG&E's
18 rebuttal testimony and makes changes to the overall
19 undergrounding mileage recommendations. Otherwise
20 stated, this change is not reflected in PG&E's summary
21 of party positions.

22 TURN also provided an errata to TURN-07 on
23 March 26th, April 24th, and May 5th. Similarly, any
24 numerical changes as a result of TURN's errata would not
25 be addressed in our rebuttal.

1 Q Thank you. Now, are the facts contained in the
2 exhibits you are sponsoring true and correct, to the
3 best of your knowledge?

4 A Yes, they are.

5 Q And opinions expressed therein represent your
6 best professional judgment?

7 A Yes, they do.

8 Q Thank you, Ms. Colvin.

9 Mr. Ash, could you please spell your name and
10 provide your business address?

11 WITNESS ASH: Yes, my name is James Ash, that
12 is spelled James Ash, J-a-m-e-s, A-s-h. My business
13 address is 300 Lakeside Drive, Oakland, California.

14 Q And could you please introduce yourself?

15 A Yes. So, again, my name is James Ash. I'm the
16 manager of the undergrounding risk management team for
17 PG&E. In this role, I'm responsible for
18 operationalizing PG&E's wildfire risk models to inform
19 the prioritization and selection of wildfire system
20 hardening mitigations. My responsibilities include
21 translating model risk insights into actionable
22 investment decisions, ensuring consistency and rigor in
23 how risk information is applied across planning
24 processes and supporting enterprise-level decisionmaking
25 by aligning mitigation strategies with PG&E's risk

1 reduction objectives.

2 I have a Bachelor of Science in Geophysics from
3 Texas A&M University. I am a National Counsel of
4 Examiners for Engineering and Surveying Certified
5 Engineer in Training. I have worked at PG&E since 2020,
6 beginning as a program manager, transitioning to my
7 current role in 2024.

8 Prior to my employment with PG&E, I worked for
9 Texas A&M University, SINAI's Technologies, multiple
10 utility consulting firms; and I have more than 10 years
11 of quantitative analytical experience, seismic analyses,
12 engineering design, and risk assessments. My background
13 focuses on applying quantitative risk assessment to
14 infrastructure planning and wildfire mitigation to
15 support practical -- practical, defensible
16 decisionmaking.

17 Q Thank you. I would like to confirm the
18 testimony you are sponsoring in this proceeding.

19 In what has been marked as Exhibit PG&E-16, are
20 you sponsoring Chapter 7 Wildfire System Hardening,
21 Sections D.3 and D.4 of Rebuttal Testimony, Chapter 7
22 Attachment C, PG&E's 2026 to 2028 Wildfire Mitigation
23 Plan Response to Revision Notice RA, and the documents
24 in Exhibit PG&E-16, Appendix A that relate to your
25 sponsored rebuttal testimony?

1 A Yes, I am.

2 Q In what has been marketed as Exhibit PG&E-16,
3 are you co-sponsoring Chapter 7 Attachment A, PG&E's
4 2026 to 2020 Wildfire Mitigation Plan Revision III,
5 Volume I, Chapter 7 Attachment B, PG&E's 2023 to 2027
6 System Hardening Work Plan as of March 11, 2026, which
7 was being -- which is also being provided via the
8 archival DVD for admission to the record -- and
9 Chapter 7, Attachment D, Energy Safety's 2026 through
10 2028 Base WMP Decision?

11 A Yes, I am.

12 Q And in what has been marked as Exhibit PG&E-24,
13 are you sponsoring your statement of qualifications.

14 A (Audio failure.)

15 (Reporter clarification.)

16 WITNESS ASH: In response to that, yes. Yes, I
17 am.

18 BY MS. CHARIPAR:

19 Q In what has been marked as Exhibit PG&E-4, are
20 you willing and able to help respond to questions
21 concerning Chapter 7 Wildfire System Hardening, as
22 sponsored by Witness Julie Colvin, regarding the
23 following: Section B.2.A System Hardening Program,
24 Section B.2.B Fire Rebuild Project Selection and
25 Funding, Section D.2.A System Hardening Risk

1 Calculation, Section D.2.B System Hardening
2 Accountability Report, and Section D.2.C.1
3 Undergrounding Cost and Risk Reductions from 2021 to
4 2024?

5 WITNESS ASH: Yes, I am.

6 Q Now, what activities and programs does your
7 testimony cover?

8 A My testimony addresses, specifically, where,
9 when, and why system hardening work is selected as it
10 relates to the approved risk framework.

11 Q Now, were the relevant exhibits P- -- were the
12 relevant Exhibit PG&E-16 Chapter 7 materials prepared by
13 you or under your supervision?

14 A Yes, they were.

15 Q Do you have any changes, corrections, or
16 additions to make at this time?

17 A I do not have any changes or corrections to
18 make at this time. However, as noted by Ms. Colvin, I
19 would like to note that my rebuttal testimony responds
20 to the intervenor testimony available to PG&E as of late
21 March 2026. And therefore does not respond to the
22 changes and updates made to the testimony of Exhibit
23 TURN-07, testimony of Eric Borden, nor the testimony of
24 Mussey Grade Road Alliance by Dr. Mitchell.

25 Q Are the facts contained in the relevant PG&E

1 exhibits true and correct, to the best of your
2 knowledge?

3 A Yes, they are.

4 Q And do the opinions expressed therein represent
5 your best professional judgment?

6 A Yes, they do.

7 Q Thank you. Your Honor, Mr. Ash and Ms. Colvin
8 are available for cross-examination.

9 ALJ LARSEN: ALL right. Thank you.

10 Then go ahead, Mr. Mitchell.

11 MR. MITCHELL: Thank you, your Honor. May I
12 first move to mark and identify Exhibits MGRA Exhibit 8
13 and MGRA Exhibit 9. These are listed correctly in the
14 hearing's exhibit list.

15 ALJ LARSEN: All right. So marked for
16 identification. And I note that a ruling was issued
17 this morning approving the marking and identification of
18 the current exhibit list that was served yesterday
19 afternoon, so go ahead.

20 MR. MITCHELL: Thank you.

21 (Exhibit MGRA Ex-08 was marked for
22 identification.)

23 (Exhibit MGRA Ex-09 was marked for
24 identification.)

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CROSS-EXAMINATION

BY MR. MITCHELL:

Q Good afternoon, Ms. Colvin and Mr. Ash.

Could you please turn to the rebuttal testimony on page 7-13. And do you see where -- that the rebuttal testimony states that overhead hardening is 68 percent effective compared to 98 percent for undergrounding?

WITNESS COLVIN: Yes, I see that.

Q You also state there that achieving an equivalent level of wildfire risk reduction therefore would require additional mileage need to be deployed to achieve the same risk reduction?

A That's right.

Q Does this include down conductor detection?

WITNESS ASH: The 68 percent effectiveness in this section of testimony refers to covered conductor on its own. But no, it does not include --

Q Thank you.

(Reporter clarification.)

MR. MITCHELL: Yes.

WITNESS ASH: Just confirming that the 68 percent referenced in this portion of PG&E's rebuttal testimony refers only to covered conductor, and does not include downed conductor detection.

Q Thank you. So can we turn to Exhibit

1 MGRA Ex-09? That is an excerpt from the PG&E Wildfire
2 Mitigation Plan R-3, which I think you may have in
3 evidence elsewhere, but I placed it as a cross-exam
4 exhibit.

5 If you could please go to page -- the fifth
6 page, which is showing Table PG&E 6.1.3-1, Mitigation
7 Effectiveness Alone and in Combination?

8 Do you see that?

9 WITNESS ASH: Yes, I am there.

10 Q Thank you. Looking at that table, you see
11 covered conductor listed at 67 percent; correct?

12 A Yes. Line number 6.

13 Q And then, line number 5, covered conductor plus
14 DCD plus EPSS is at 79 percent. And covered conductor
15 plus EPSS, plus PSPS is at 97 percent; correct?

16 A Yes, I see those items.

17 Q Yes. So, the adjustment of miles of line to
18 achieve equivalent risk reduction would be different
19 under the assumption that EPSS and PSPS were in place
20 for overhead hardening, would it not?

21 A So I -- I believe what you are alluding to is
22 that EPSS covered conductor -- covered conductor paired
23 with EPSS and downed conductor detection DCD does
24 present a higher wildfire mitigation effectiveness value
25 than covered conductor alone. However, it's important

1 to note that when referred to, risk reduction as a
2 whole, we should also account for the overall utility
3 risk on our system, which includes some of those adverse
4 reliability impacts that are introduced as a result of
5 programs such as -- as EPSS. But, yes, on a per- --
6 per-mile basis, more risk can be reduced from EPSS --
7 covered -- covered conductor than covered conductor
8 alone.

9 Q Thank you. Can we go back to the rebuttal
10 testimony, please, page 7-60?

11 So, question is: Is benefit cost ratio, BCR, a
12 factor that PG&E uses in selecting mitigation and
13 prioritizing work?

14 A Okay. I am now in rebuttal testimony
15 page 7-60. And yes, to confirm, BCR is a consideration
16 when PG&E selects system hardening mitigations.

17 Q So does BCR used for selection in priority --
18 prioritization of mitigations incorporate life cycle
19 costs of different mitigations?

20 A Yes. The -- the BCRs incorporate the -- the
21 point estimate for the risk benefits over the lifetime
22 of that asset -- 50, 50 some odd years, as well as the
23 expected lifetime costs of each mitigation.

24 Q Okay. So, that is a complete number looking at
25 the entire life cycle?

1 A Yes. Based off the -- off a single point
2 estimate.

3 Q And when you're calculating BCR for this
4 purpose, does that include in- -- reduced operational
5 costs, such as vegetation management and inspections?]

6 A Yes, it does, to the ability we are able to
7 forecast those costs and reductions.

8 Q Yeah. And so you said it was a point estimate
9 and also estimated over the entire expected lifetime of
10 the mitigation; is that correct?

11 A That is correct.

12 Q Thank you. Do the models that PG&E uses to
13 calculate BCR incorporate low-frequency,
14 high-consequence events?

15 MS. CHARIPAR: Dr. Mitchell, is there a cite in
16 the testimony that you're referring to?

17 BY MR. MITCHELL:

18 Q Let's see. Does the BCR include the wildfire
19 distribution risk model?

20 WITNESS ASH: So the BCR does include inputs
21 from the WDRM, yes.

22 Q Thank you. And are you aware whether it
23 incorporates the low-frequency, high-impact events when
24 calculating its baseline risk?

25 A I don't think that I'm the correct SME to speak

1 to the intricacies within WDRM.

2 Q You make a statement that small changes in
3 assumed probability or consequences can materially
4 affect the expected value and reliance on a BCR metric
5 alone may mask the severity and irreversibility of
6 catastrophic outcomes. That seems to be a statement
7 about whether the risk model used to calculate the BCR
8 correctly calculates low-probability, high-consequence
9 events. Would you affirm that statement.

10 A I think that statement is intended to be more
11 generalized, not speaking to the WDRM specifically. But
12 in general, wildfire risk modeling, you're dealing with
13 inherently low-probability, high-consequence type
14 events, so that's the reason for inclusion of that
15 specific language.

16 Q Is that language stating that the BCR metric is
17 underestimating risk or is it a statement regarding the
18 uncertainty of the risk or both?

19 A It's primarily the latter. The risk estimates
20 are only -- they're products of layers and layers of
21 assumptions within risk models, and there is uncertainty
22 in any assumption put into the model when compared to
23 real-world outcomes.

24 Q So with that in mind, does the PG&E Decision
25 Tree deploy another uncertainty factor, quote, "that

1 permits consideration of undergrounding for a circuit
2 segment if BCR falls within 50 percent of the BCR for
3 alternative system hardening measures"? That is on page
4 7-61, line 17, I think.

5 A Yes. I see the text you're referring to. You
6 mentioned an additional uncertainty factor though. I
7 would like to clarify that the uncertainty factor that
8 PG&E incorporates in its decision making is really one
9 wholesale uncertainty factor to account for many things,
10 uncertainties in the cost estimates, the risk estimates,
11 the assumed effectiveness of each mitigation. So it's
12 not necessarily an additional certainty metric, just to
13 be clear.

14 Q Thank you. So you're saying that all of the
15 uncertainty that you're referring to is accounted for by
16 that 50 percent potential adjustment on line 17 of
17 page 7-61?

18 A Yes. The intention of that 50 percent
19 uncertainty factor is to account for those many
20 unknowns. And we allow a prudent decision towards the
21 most risk-reducing option in the face of those unknowns.

22 Q Yes. Then if that is the primary way that PG&E
23 incorporates uncertainty, what is risk scaling
24 accounting for?

25 MS. CHARIPAR: Objection, your Honor. I don't

1 believe these are the witnesses to speak to risk
2 scaling.

3 ALJ LARSEN: I was going to ask actually. I
4 was going to wait until Mr. Mitchell finished, but who
5 would that witness or witnesses be, and then -- because
6 there was also a question regarding whether the models
7 incorporate low-frequency, high-consequence events. I
8 thought that this panel was one that addressed these
9 risk management issues. So what witnesses would be able
10 to address those things?

11 MS. CHARIPAR: Mr. Ash, did you want to say
12 something?

13 WITNESS ASH: Yeah, I think I can respond to --

14 ALJ LARSEN: Just one thing at a time.

15 I'll overrule the objection, and then let's see
16 if the panel can answer this question.

17 Mr. Mitchell, did you want to say something?

18 MR. MITCHELL: Yes, I can draw your Honor's and
19 the witness' attention to page 7-64, Section 3. It's
20 starting at line 26, "PG&E appropriately uses risk
21 scaling to inform mitigation selection decisions."

22 MS. CHARIPAR: Yes.

23 WITNESS ASH: I see that section.

24 WITNESS COLVIN: So I'll just add, in this
25 section we are reviewing really how we consider using

1 risk scaling to inform our decisions, which like Dr. Oum
2 who testified for Exhibit PG&E-14, Chapter 1. She's
3 responsible for our enterprise risk model.

4 And in this section of the testimony, we
5 eventually connect the dots that the risk scaling is
6 necessary and the best approach to achieve safety and
7 long-term affordability.

8 And then the question specific to risk scaling
9 is applied to Exhibit PG&E-14, Chapter 1, with Ms. Yumi
10 Oum, who's a witness in that chapter.

11 Do you want to talk about this?

12 WITNESS ASH: No.

13 WITNESS COLVIN: Okay.

14 BY MR. MITCHELL:

15 Q May I then refer to Ms. Oum's testimony?

16 WITNESS COLVIN: Yes.

17 Q Can I refer you to the April 28th hearing
18 transcript on page 566.

19 A One second.

20 Q Line 20 says, "Without risk averse scaling,
21 safety and long-term affordability will be sacrificed to
22 achieve short-term affordability goals."

23 As I understood it, affordability is a
24 benefit-cost ratio calculation. That's how benefits and
25 averted risks are balanced against each other. So do

1 you have any comment on how long-term affordability is
2 improved by removal of -- or through risk scaling or
3 application of lifecycle costs?

4 WITNESS ASH: I would just, again, like to
5 emphasize that I'm not the correct SME for risk scaling,
6 but I can respond in part to that question. My response
7 is, again, since wildfire risk is such a potentially
8 catastrophic risk that can have devastating outcomes on
9 our communities, it is PG&E's stance that elimination of
10 that risk should be prioritized to allow -- to prevent
11 catastrophic outcomes of wildfires in the future.

12 That would be an example of how long-term
13 affordability could be impacted if catastrophic events
14 do arise if PG&E does not perform adequate mitigations
15 in some of our high-risk locations.

16 Q Okay. I think that will conclude my questions
17 then. Thank you very much.

18 ALJ LARSEN: Could someone address,
19 Mr. Mitchell, your question about whether the models
20 incorporate low-frequency, high-consequence events?
21 Could anyone tell me if that's in the testimony of the
22 previous witness on the 28th or is that something that
23 we still want clarified in the record?

24 Mr. Mitchell, you want to speak to that first.

25 MR. MITCHELL: Yes, your Honor. As I

1 understand it, there are two components to the answer.
2 There is the enterprise risk model which uses a
3 truncated power law which is designed to take into
4 account low-frequency, high-impact events -- wildfire
5 events in particular -- and that accurately describes
6 the observed wildfire losses and is expected to in the
7 PG&E risk area. Additionally --

8 ALJ LARSEN: Wait, wait. Mr. Mitchell, I just
9 want to know if this is -- if it's in the record and
10 whether we need to ask that question of somebody else
11 basically instead of going into an explanation of that.

12 MR. MITCHELL: Yes, sir. Yeah, I think it
13 would -- so the enterprise risk model, I think, is
14 handled differently than the WDRM risk model, which the
15 witnesses today are referring to. And I think it's
16 Witness Brown who manages the consequence model for the
17 WDRM. As far as the enterprise risk model, I'm not sure
18 whether that's Dr. Oum or whether that would be Witness
19 Brown. That would require additional --

20 WITNESS COLVIN: It is Dr. Oum.

21 MR. MITCHELL: That would be Dr. Oum?

22 WITNESS COLVIN: Yes.

23 MR. MITCHELL: So there's two different pieces
24 with two different witnesses.

25 WITNESS COLVIN: Right.

1 ALJ LARSEN: But is that information in the
2 record or is that something that we're missing at this
3 point?

4 MR. MITCHELL: I know the enterprise risk model
5 is in the record. I feel confident about that. The
6 WDRM -- I know that -- the record is somewhat unclear to
7 me.

8 ALJ LARSEN: Okay. Mr. Matthews.

9 MR. MATTHEWS: Thank you, your Honor. Walker
10 Matthews for PG&E. Could we go off the record?

11 ALJ LARSEN: Yes. We're off the record.

12 (Off the record.)

13 ALJ LARSEN: We're back on the record.

14 Mr. Ash, off the record we were discussing
15 whether we need an additional witness for different
16 questions, and Mr. Ash is going to offer some more
17 explanation.

18 So go ahead, Mr. Ash.

19 WITNESS ASH: Thank you, your Honor. I would
20 like to refer to Exhibit PG&E-47 recently introduced.
21 The exhibit is a simple figure showing how our WDRM risk
22 model, which is a relative risk model, ties in with our
23 wildfire -- the enterprise model that Dr. Oum manages.

24 So the way that we use these two models
25 together to select system hardening mitigations and the

1 correct alternative mitigation is we start with the
2 WDRM, which provides a relative ranking of risk across
3 our system. Those are all -- the rankings are based on
4 the circuit segment level. Each circuit segment has a
5 number of risk points and a relative ranking.

6 Separately, we have our enterprise wildfire
7 bowtie model that is intended to quantify the absolute
8 value -- the dollar value of risk -- on our system. So
9 we can take those two separate models and calculate
10 based off of the total dollar value from our
11 bowtie essentially divided by the unit list risk points
12 from the WDRM. We can yield a dollar value per risk
13 point.

14 Now circling back, each circuit segment has its
15 own unique portion of risk points, which means we can
16 assign an estimated dollar value of wildfire risk to
17 each circuit segment.

18 ALJ LARSEN: Okay. Go ahead.

19 BY MR. MITCHELL:

20 Q Yes. So that would incorporate both elements
21 of the enterprise risk model and for the overall cost
22 and the WDRM for the specific point rankings for risk.
23 Is that a correct restatement of what you just said?

24 WITNESS ASH: Yes, that is correct.

25 Q Thank you.

1 So, yes, I think then the remaining uncertainty
2 is with regard to the WDRM. I am personally, having
3 reviewed it, fairly confident that we have the record
4 for the enterprise risk model with regard to tail risk
5 and low-probability, high-impact events. But with WDRM,
6 there are some open questions regarding how extreme
7 events weigh into that model that might benefit from
8 further exploration.

9 ALJ LARSEN: Okay. Mr. Matthews, you have your
10 hand up, but you may have forgotten to take it down.

11 With regard to the other witnesses, I just want
12 to note that we will be asking the questions from the
13 April 24th ruling. I was planning to wait until after
14 both the cross of TURN and MGRA, and then I have a
15 couple questions left over from April 28th.

16 So if it would help to have either or both of
17 the other witnesses, Oum and Brown, on this panel, I'd
18 be happy to accommodate them. We can take a quick
19 break, and they can join us so that we're not in this
20 situation where we have questions and it's for a
21 different witness.

22 I see a hand up. Ms. Charipar.

23 MS. CHARIPAR: Yes. I would just like to
24 suggest -- I mean we wanted to confer for redirect as
25 well, so we can consult on the PG&E side on adding a

1 panel and what's feasible as well as prepare for
2 redirect if that would work for your Honor.

3 ALJ LARSEN: Okay. So Mr. Mitchell, do you
4 have any other questions for these two witnesses?

5 MR. MITCHELL: No, your Honor.

6 ALJ LARSEN: Okay. Let's take a 10-minute
7 break. It's 1:28. Let's make it a 12-minute break and
8 come back at 1:40.

9 We're off the record.

10 (Off the record.)]

11 ALJ LARSEN: We're back on the record.

12 And we were previously off the record
13 discussing additional witnesses and how to add or
14 clarify what's in the record regarding certain
15 modeling -- so, Mr. Mitchell -- if it's all right with
16 you, Ms. Charipar, Mr. Mitchell could just restate what
17 he said.

18 MR. MITCHELL: Yes. Exhibit MGRA Exhibit 5
19 is -- has been put into the record, but -- and -- well,
20 it hasn't been moved into the record yet, but it will be
21 in the record. It's the Wildfire Consequence Model
22 Version 4 documentation.

23 ALJ LARSEN: Okay. All right. Then,
24 Mr. Mitchell, I would be fine with having -- adding --
25 adding Dr. Oum to this panel. Do you have any comments

1 on that?

2 MR. MITCHELL: No, your Honor.

3 ALJ LARSEN: Okay. Then let's go ahead and
4 bring in -- is it Dr. Oum?

5 MS. CHARIPAR: Yes.

6 ALJ LARSEN: Okay. Let me have her join the
7 three, and then I'll swear her in. And then,
8 Mr. Mitchell, if there's any other -- if you want to
9 re-ask a question or ask an additional question
10 including her on the panel, we can do that.

11 Ms. Charipar.

12 MS. CHARIPAR: Yes. Would you like me to
13 conduct my very brief redirect before we add Ms. Oum to
14 the panel?

15 ALJ LARSEN: Okay. Yeah. Let's -- let's do
16 that. Okay. So let's bring back Mr. Ash, Ms. Colvin
17 without Dr. Oum first. Okay. Go ahead.

18 MS. CHARIPAR: Apologies for the confusion
19 there. Okay. Thank you, your Honor.

20 REDIRECT EXAMINATION

21 BY MS. CHARIPAR:

22 Q So, Mr. Ash, do you recall we were having a
23 discussion about whether the BCR calculations
24 incorporate low-frequency and high-consequence events?
25 Do you recall that conversation?

1 A Yes, I do.

2 Q Okay. And -- and can you now answer that after
3 reviewing your testimony?

4 A Yes. And, again, referring to Exhibit PG&E-47,
5 just to make it -- make it clear that the WDRM and bow
6 tie worked together in our decision-making. Yes. To
7 the extent that there's low consequence -- sorry --
8 low-probability, high-consequence events are represented
9 in the absolute value of risks in our enterprise bow
10 tie, yes, those would be included in the BCR
11 calculations for all system hardening mitigation
12 alternatives. Overhead, underground, remote grid. All
13 the above.

14 Q Okay. So then what is the role of the 50
15 percent threshold that is used in your mitigation
16 selection?

17 A The purpose of the 50 percent threshold in
18 our -- PG&E's system hardening decision tree is to allow
19 for a relative buffer between BCRs for undergrounding
20 and other less -- less risk reducing mitigations such as
21 overhead hardening.

22 MS. CHARIPAR: Okay. Thank you. No further
23 questions.

24 ALJ LARSEN: Okay. Mr. Mitchell, do you have
25 any clarifying questions for these two witnesses, or do

1 you want to add Ms. -- Ms. Oum?

2 MR. MITCHELL: No, your Honor. I have no
3 further questions for these witnesses, but I would have
4 questions for Dr. Oum.

5 ALJ LARSEN: Okay. Then let's welcome Dr. Oum.

6 Okay. Welcome, Dr. Oum. Thanks for coming on
7 such short notice. Let me have you sworn in real quick.
8 Can you raise your right hand.

9 MS. OUM: (Witness complying.)

10 ALJ LARSEN: Do you swear to tell the truth,
11 the whole truth -- I mean, hold on a sec. Yeah.

12 Do you swear or affirm under penalty of perjury
13 that the testimony you are about to give in this
14 proceeding will be the truth, the whole truth and
15 nothing but the truth?

16 MS. OUM: Yes, I do.

17 ALJ LARSEN: And you agree to abide by the
18 witness attestations?

19 MS. OUM: Yes, I do.

20 ALJ LARSEN: Okay. You're a little bit soft.
21 So please --

22 MS. OUM: Oh.

23 ALJ LARSEN: -- speak up.

24 And go ahead, Mr. Mitchell.

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YUMI OUM,

called as a witness by Pacific Gas and
Electric Company, having been sworn,
testified as follows:

CROSS-EXAMINATION

BY MR. MITCHELL:

Q So I would refer -- hello, Dr. Oum. Good
afternoon. Thank you for coming. I'd like to refer
back to your testimony during the hearing of -- the
hearings transcript on page 582, line 12, where it
says -- and then again down on 29:

Sole reliance on risk-neutral BCRs
systematically undervalues low-probability,
high-consequence events.

So that would seem to imply that there is a
bias in the PG&E risk model where the PG&E risk model on
its own does not correctly incorporate or calculate
low-probability, high-consequence events; is that
correct?

A There are two parts of incorporating
low-probability, high-consequence events into the risk
model. One is to correctly reflect the probability
distribution of those consequences of low-frequency
events as we are doing using probable distribution.

And the second piece is to correctly reflect or

1 reasonably reflect the risk aversion associated with
2 extreme outcomes or catastrophic risks. So PG&E's risk
3 models are reflecting those two elements, which we
4 believe that without either component it's not going to
5 be -- accurately reflect or accurately value
6 low-probability, high-consequence risk events in the
7 risk model.

8 Q Thank you. That is clarifying. So I think the
9 key word then is "undervalues." It's not
10 "undercalculates." It's not "miscalculates." The risk
11 models, as far as you can tell, to calculate that --
12 those high-consequence, low-probability events correctly
13 it's just when you apply values to them what their
14 intangible impacts are, then you make the conclusion
15 that the BCR systematically undervalues those events?

16 Am I correctly stating what you're saying
17 there?

18 A So, again, this is risk analysis. So this is
19 not -- let me -- let me state again. I agree with you
20 in that we are intentionally writing this as undervalues
21 rather than undercalculates, because -- by that I mean
22 that undercalculates -- I think you are referring to the
23 fact that when we do the risk analysis we compare the
24 probability of risk event and what is the consequence of
25 the risk events.

1 And if you mean the risk calculation as the --
2 representing those two elements, yes. And undervalue
3 here -- the reason that we use the undervalue here is to
4 reflect how we should value avoiding certain risks in
5 the -- through the risk analysis. And so the value
6 component is coming through the risk scaling function to
7 reflect the aversion to risk.

8 Q Okay. I think that clarifies the issue. Thank
9 you.

10 ALJ LARSEN: Okay. Any further questions,
11 Mr. Mitchell?

12 MR. MITCHELL: No thank you, your Honor.

13 ALJ LARSEN: Okay. And you, Ms. Charipar,
14 before we go onto TURN?

15 MS. CHARIPAR: No, your Honor.

16 ALJ LARSEN: Okay. All right. Then, Ms. Fall,
17 you have an extra witness. So please proceed.

18 CROSS-EXAMINATION

19 BY MS. FALL:

20 Q Thank you, your Honor. Good afternoon,
21 everyone.

22 WITNESS ASH: Good afternoon.

23 WITNESS COLVIN: Good afternoon.

24 Q Do you have available what's been marked as
25 TURN Exhibit 502?

1 A I'm assuming this is what you submitted. And
2 so I don't know if that's that exhibit number, but I'm
3 going to assume yes.

4 Q Okay. Well, I want to make sure, because there
5 was an exhibit last night, 503. That's not what we're
6 going to be referring to. It's Exhibit 502 that was
7 served Friday.

8 A Is it the TURN 1 -- is it the Data Request 143,
9 the supplemental or the original?

10 Q Yes, the supplemental. Exactly.

11 A Got it. I got it.

12 Q Okay. Good. We're going to -- was this
13 response prepared by you or under your supervision?

14 A Yes.

15 Q Okay. Are you familiar with its contents
16 including the attachment?

17 A Yes, I am.

18 Q Okay. We're going to turn to page 4. It's
19 page 5 of the PDF. It's where the Excel spreadsheet
20 starts. Okay. And the top should state -- should
21 state: PG&E's Original Proposal for Overhead Hardening.

22 Do you have that?

23 A Just a second. Yes, I have it.

24 Q Okay. And this page represents PG&E's proposed
25 system overhead hardening cost in the rate case; is that

1 right?

2 A Can you refer to the line item?

3 Q Well, I'm referring to the entire workbook
4 that's titled PG&E's Original Proposal for Overhead
5 Hardening. So right now I'm not referring to the line
6 item. I'm referring to the whole workbook and making
7 sure I'm characterizing --

8 A Yes, essentially. This is a portion of the
9 workpapers that we submitted but the -- for '27 to '30,
10 there's -- a portion of this discovery response
11 references the overhead hardening request, yes.

12 Q Okay. Thank you. And then on the following
13 page, there the table entitled Multiyear Overhead
14 Hardening Factors, do you see that?

15 A I apologize because I have, basically, the
16 spreadsheet printed out separate. And so give me just a
17 second just to make sure my page numbers I have are all
18 correct. Now I'm looking at the spreadsheet. The
19 attachment I was given didn't have the attachments
20 printed out, so I'm just looking at --

21 MS. CHARIPAR: Your Honor, if I may -- if we
22 could just go off the record for a second, we can bring
23 her a copy.

24 ALJ LARSEN: We're off the record.

25 (Off the record.)

1 ALJ LARSEN: We're back on the record.

2 BY MS. FALL:

3 Q Are you able to locate "Multiyear Overhead
4 Hardening Factors"?

5 A Sorry. Are you looking -- I'm not -- oh.
6 There it is. It's right in front of my face. Okay.

7 Q Okay. Could you please describe what these
8 rows represent?

9 A Yes. So PG&E -- this essentially represents
10 our forecast methodology for our system hardening work.
11 In particular, this is specific to overhead hardening,
12 and what we're looking at are the percentage allocations
13 of our capital expenditures that we would incur each
14 year for the work that would be completed for the --
15 like the miles that are planned in one year.

16 And so if I'm walking you through this
17 particular portion of the table, you can see essentially
18 the -- starting from the bottom, there's the readiness
19 cost that we incur. So in completion year minus 2,
20 that's referring to two years prior to that work being
21 completed, and that's one percent of the total cost.

22 The second readiness cost CY-1 is completion
23 year negative 1 -- negative 1, the costs are 25 percent
24 one year prior to this work being completed. Execution
25 cost closeout year 0 is 72 percent, and that's

1 essentially when a majority of the costs are incurred is
2 the completion year of the job, and that's when we're
3 constructing and energizing that work.

4 And specific to overhead hardening, closeout
5 cost, completion year plus 1, that's one year after the
6 work is completed, and this is 2 percent of the total
7 cost we'd be incurring for work completed in 2024 we've
8 incurred -- 2 percent of that is incurred in closeout
9 after 2024 work is completed.

10 Q Okay. So just to make sure I'm understanding
11 correctly, for example, closeout year is 2026. So
12 closeout year minus 2 would be 2024. And closeout year
13 plus 1 would be 2027; is that right?

14 A That's right.

15 Q Okay. And the percentages listed in each
16 column, how are they calculated?

17 A It comes from an historical analysis that we
18 basically take historical data for how much our costs
19 are incurred for previous projects, and we've submitted
20 another discovery, additional approaches that details
21 our capital budget model. And essentially, it comes
22 from historical costs that we've incurred for this.

23 Specifically, it's from overhead hardening.
24 And this is essentially the spread of the capital
25 expenditures that we incur over the course of four years

1 for the work that's completed essentially in that third
2 year for the model.

3 Q Okay. So historically your closeout costs for
4 CY+1 has been 2 percent. So that's why you included it
5 as 2 percent? Is that what you're saying?

6 A That's what we're saying, yes.

7 Q Okay. Now, moving to the next table, the one
8 labeled 2027 to 2030 Capital Costs.

9 A Yup.

10 Q Okay. I think we're on the same page now. On
11 the 2028 column, there's 197.5 million as the total
12 capital expenditure that PG&E is proposing for the
13 overhead program in 2028; is that right?

14 A That's right.

15 Q Within this table, there's also a row labeled
16 "2028 Projects"?

17 A Yup.

18 Q And that sums to 196.6 million; is that right?

19 A That's correct.

20 Q Okay. What are the costs that are summed in
21 that row?

22 A In the row, it is summing all of the costs --
23 if I'm talking about 2028, I'm summing the costs between
24 the readiness work that's taking place in '26 and '27,
25 and then the year of completion, which is 2028, as well

1 as then the closeout costs in 2029. So that's summing
2 essentially the costs from the table prior and
3 calculating the portion of the work that we complete,
4 the years leading up to, during completion and
5 afterwards. That's the total cost that's incurred for
6 projects that are completed in 2028.

7 Q And why don't the costs equal each other?

8 A Because it differs from when we spend our money
9 as far as the capital expenditures that we incur over
10 essentially this GRC period. So the way we've made our
11 request for recovery is specific to the capital
12 expenditures. So over the course of the GRC period,
13 we're going to have work completed over four -- four
14 years, but we're incurring the cost over time that's not
15 equal to just a unit cost times miles per unit that we
16 plan to complete that work.

17 We incur sort of different proportions of costs
18 based on how many miles will be completed in that one
19 year. And so we've set up this capital budget model in
20 our capital expenditures request to better be -- to be
21 more consistent with how we incur those costs.

22 Q Okay. One of the rows says "2027 Project"?

23 A Yup.

24 Q And the column lists 3.3 million in 2028; is
25 that right?

1 A That's right.

2 Q Okay. And so that 3.3 million is the closeout
3 cost in 2028 for the 2027 projects; is that right?

4 A Correct.

5 Q Okay. And that coincides with the 2 percent
6 from earlier, the CY+1; is that right?

7 A Yes. Yup.

8 Q And so if I'm following correctly, the 2
9 percent of the one point -- the 192.7 million of the
10 total 2027 cost from the 2027-2030 table is -- wait.
11 Let me say that again -- is represented by the 3.3
12 million?

13 A The closeout cost for 2027 work that's
14 completed in '27 is 3.3 million, which is incurred in
15 2028, yes.

16 Q All right. And that is 2 percent of the 192.7
17 million listed as the total 2027 cost?

18 A Approximately, yes.

19 Q Approximately. Okay. And what is PG&E's
20 proposal for when that 3.3 million will begin to go into
21 rates?

22 A Well, the costs are forecasted. I'm going to
23 do my best. So we -- we forecast these costs for when
24 these expenditures will take place. And once the work
25 is completed in '27, we're forecasting that 2 percent,

1 and then we will true-up the cost thereafter if the 2
2 percent forecast differs from our actual expenditures.
3 So this is based on our forecast ratemaking, which I
4 understand would take place once the work is completed
5 in '27, and then we true-up the costs if they differ
6 when the costs are realized.

7 Q So in 2028 is when you would true it up if it
8 was different?

9 A My understanding is yes.

10 Q There are \$6 million listed in the row for 2026
11 projects under the 2027 column here, and that's
12 similarly based on the 2026 project closeout cost,
13 correct?

14 A That's right.

15 Q All right. And if those differ, you would true
16 those up in 2027?

17 A My understanding is we would true them up, yes.
18 However, the \$6 million is included in our request for
19 overhead hardening starting in 2027, because the
20 previous '23 GRC decision didn't include these costs.

21 Q Okay. So this is the forecast for the system's
22 hardening overhead costs, right?

23 A Yes.

24 Q Is there any reason why any of the explanation
25 you've given generally for these costs would be

1 different for the system hardening undergrounding cost
2 forecast?

3 A The approach is essentially the same as far as
4 how we use the capital budget model. There's different
5 assumptions with the split of -- say right now I was
6 showing you -- if you go to the multiyear overhead
7 hardening factors, there's a different percentage of
8 split between how much a portion of the costs are
9 incurred each year. But for undergrounding, we do
10 essentially use a similar method to forecast how much of
11 the portion of work is readiness, how much will be
12 incurred in closeout year, and how much would be
13 incurred in closeout costs the year after the work is
14 completed. So the method is the same. The amounts are
15 obviously different.

16 And to be clear, we've only included the 2027
17 undergrounding miles, and so there is 20 -- for
18 undergrounding, 2027 costs and then closeout costs for
19 2028.

20 Q Okay. And other than unit cost and mileage,
21 are there any major differences between how the overhead
22 hardening forecast is constructed versus the underground
23 forecast?

24 A I would just anchor back to the portion of the
25 work. So if you look back at multiyear overhead

1 hardening factors, closeout costs year plus 1 is 2
2 percent. Then it's 72 percent '25. Those -- those
3 percentages vary and are different from how -- from
4 undergrounding. But it's essentially the same method,
5 just different factors for the costs that are incurred
6 each of the four years.

7 Q And that's still based on historical data, how
8 you come up with the percentages?

9 A Yes.

10 MS. FALL: Okay. Thank you. Those are all my
11 questions.

12 ALJ LARSEN: All right.

13 Then, Ms. Charipar, any redirect?

14 MS. CHARIPAR: Yeah. We will. I will need
15 five minutes, if I may, your Honor.

16 ALJ LARSEN: Okay. Okay. It's 2:10.

17 We're off the record.

18 (Off the record.)

19 ALJ LARSEN: We're back on the record.

20 Ms. Charipar, go ahead.

21 MS. CHARIPAR: Thank you, your Honor.

22 REDIRECT EXAMINATION

23 BY MS. CHARIPAR:

24 Q Ms. Colvin, so just turning back to the Exel
25 spreadsheet that you were looking at, can you confirm

1 that this is a table of capital expenditures?

2 A Yes, that's right.

3 Q Okay. And does this table show capital
4 additions?

5 A It does not.

6 Q And is it your understanding that capital
7 additions are used for setting revenue requirements, not
8 capital expenditures?

9 A That's my only understanding. And beyond that,
10 I would have to defer to our revenue requirements
11 team -- RO team to answer other questions on ratemaking.

12 Q Thank you. And so when you said -- when you
13 answered questions concerning when certain amounts will
14 go into rates, do you want to clarify your response to
15 those at this time, like whether the 3.3 million would
16 be trued-up in 2028? Or I believe there was a question
17 referring to \$6 million and then when it goes to rates.

18 A I think the clarification is I'm not the right
19 witness to answer when these costs will go into rates.
20 So I defer to our revenue requirements team.

21 MS. CHARIPAR: Okay. And in light of that, I
22 would like to offer to TURN if they would like to submit
23 like a data request because we do want to be responsive.
24 We'd be happy to get the right person to answer the
25 question about when things go into rates to the proper

1 witness.

2 ALJ LARSEN: Okay.

3 MS. CHARIPAR: That is my understanding.

4 ALJ LARSEN: Yeah.

5 MS. CHARIPAR: Or -- yeah.

6 ALJ LARSEN: We could also put that in our next
7 ruling, but let's talk about that a little later.

8 Do you have any clarifying questions, Ms. Fall?

9 MS. FALL: No. No clarifying questions.

10 ALJ LARSEN: Okay. All right. So -- all
11 right. Then let me shift to my questions then, and I
12 actually have one that's related to this.]

13 Let's go off the record.

14 (Off the record.)

15 ALJ LARSEN: We're back on the record.

16 EXAMINATION

17 BY ALJ LARSEN:

18 Q All right. For overhead and underground system
19 hardening costs, can you describe what the trend is for
20 those costs for these costs from year to year?

21 This is for the panel.

22 WITNESS COLVIN: Yes. Will you give me a
23 moment to pull up our workpapers, and I can show the
24 trends. I'll just reference that. One second.

25 Q Okay. And let me clarify, I think -- what I

1 mean, is the unit costs.

2 A I --

3 Q Of course, you know, the costs depends on, you
4 know, what you're doing. And that changes. But I'm
5 talking about the --

6 A The unit -- okay.

7 Q Yes.

8 A I was going to answer a different question.

9 So, I will say for our undergrounding unit
10 costs, we have submitted that in our opening testimony
11 the previous four years of work. Let me find that table
12 that I can reference for you. One second.

13 Okay. Your Honor, I'm going to point you to
14 our opening testimony PG&E Exhibit 4, Chapter 7. And I
15 am on page 4 -- oh, sorry -- 7-47. We have included
16 here the undergrounding unit costs for four years
17 annually, since 2021 through 2024. And you can see
18 here, based on the work that has been a hundred percent
19 completed, the undergrounding unit costs in 2021 is
20 2.3 million per mile. And it has gone up to 3.2 million
21 per a mile in 2024.

22 I will say since the start of undergrounding,
23 we have saved -- sorry -- we have driven down the unit
24 costs since 2019, when the program was -- was initiated
25 or -- or over the course of five years, it was

1 approximately 4 million per mile. And we have driven
2 down the unit costs since the -- the onset of the
3 program. But you can see here, as we've put in our
4 opening testimony, our undergrounding unit cost has gone
5 up from '21 through 2024; but recognizing there's a low
6 volume of undergrounding miles in 2021 and '22. And we
7 have in '23 to 2024 -- which is when the '23 GRC
8 decision initiated -- we are hitting less than the
9 unit -- what -- what started, as far as the unit cost
10 forecasts that were included in the '23 GRC decision,
11 which started at 3.3 million per mile.

12 Q Okay. So -- all right. So, it -- the unit
13 costs started higher and then they have been -- they
14 went down as the volume went up. And then -- and now
15 they are training back up, as it sounds like the volume
16 is going down a little bit.

17 Is that --

18 A So -- so, to be cheer, the volume of work has
19 started lower in the earlier years, and is -- the volume
20 of work, as far as the miles completed, is going up.
21 Let me just make sure I'm pulling up our workpaper to
22 get the -- the citation right for you. One second.

23 Now, in our workpaper Table 7-11 -- and that's
24 on workpaper 7-12 -- we've included in our annual miles
25 completed to date and then the annual miles forecasted.

1 So, in 2021, it was a lower volume of work and in 2022.
2 In '23 was the highest mileage that we've completed.
3 And with the GRC decision, we executed less
4 undergrounding in '24, so -- it -- the mileage has gone
5 down, up, and then down again with unit costs that
6 you're seeing here in our opening testimony.

7 Q Okay. And so, when you -- before I set --
8 before I said anything about unit costs, what costs were
9 you going to provide? Were you going --

10 A Oh, I was going to look, essentially, at this
11 workpaper to show the total costs that we've incurred to
12 date, which does -- which is influenced by the mileage
13 work that we execute.

14 Q Okay. All right.

15 And so, can you answer -- or this might be the
16 same question as the other -- as TURN's -- but when do
17 these costs go into rates?

18 Can you answer that?

19 A So, I think it's -- it's the same answer. And
20 I would prefer our revenue requirements witness to
21 answer that most accurately. But what we have provided
22 in this workpaper is when we expect the capital
23 expenditures to take place, and then the forecasted
24 requests that we have for this program.

25 Q So, do you mean when the project is used and

1 useful? When the project takes place, you mean?

2 A Well, again, if we look at the workpaper
3 Table 7-11, what we are requesting are the years of work
4 for '27 through '30 of the capital expenditures incurred
5 for multiple years of work when they are used and
6 useful. And so, like I was mentioning before, we have a
7 capital budget model where there's different activities
8 taking place; right? -- for readiness work, planning,
9 scoping, and design. That's a lot less than the
10 construction, which takes -- the majority of the work
11 takes place on the year that the work is used and
12 useful.

13 And so, this is why our workpapers are set up
14 this way, to show how much we expect to incur for the
15 project costs for the -- that year the work that is used
16 and useful, but then also show when the capital
17 expenditures take place across multiple years when the
18 projects are being executed at different stages in the
19 life cycle; right?

20 So they -- over the course of say one year,
21 some projects are in early planning stages; other
22 projects are in construction when we expect that work to
23 be completed; and other -- other projects are, you know,
24 in closeout. And so we've estimated those costs
25 considering the life cycle of our program and the life

1 cycle of when we spend these capital expenditures for
2 the program.

3 ALJ LARSEN: Okay. All right. Let's go off
4 the record for just a minute. We're off the record.

5 (Off the record.)

6 ALJ LARSEN: Let me go back on the record and
7 ask a few more questions.

8 Or does anyone have any questions or comments
9 on that? Okay.

10 Mr. Matthews?

11 MR. MATTHEWS: Yes, your Honor. Walker
12 Matthews for PG&E. I would note that Mr. Cruz's
13 testimony does explain the process of how -- of how
14 capital gets recovered in our revenue requirement --

15 ALJ LARSEN: Let's make sure we're on the
16 record.

17 (Reporter clarification.)

18 ALJ LARSEN: Okay. We're on the record.

19 Go ahead.

20 MR. MATTHEWS: So, I -- I just wanted to note
21 that, that his testimony does explain that. We would
22 also be happy to -- to answer additional questions that
23 your Honor might have. But I would -- I would point
24 your Honor also to Mr. Cruz's testimony in Exhibit 10.

25 ///

1 ALJ LARSEN: Okay. All right. Thanks.

2 Q All right. So, there's a couple other
3 questions, they are somewhat high-level. Where in the
4 record does -- or -- how or does PG&E describe its plans
5 to underground and when?

6 I mean, in other words, is there -- I know
7 there's a lot of testimony on risk analysis and
8 modeling. But are there -- is anything that says where
9 these miles will be? Or where -- undergrounding of
10 these -- of these electrical lines, where exactly they
11 will be?

12 And then, let me just ask it another way that
13 might be easier: Is there also, or instead of that,
14 somewhere in the record that -- where it describes what
15 system hardening PG&E plans to install in certain
16 locations?

17 So you can --

18 WITNESS COLVIN: Yes --

19 Q Go ahead.

20 A So I will start with -- in our rebuttal
21 testimony Exhibit PG&E-16, we have attached our program
22 work plan that is from 2023 to 2027. And this is an
23 order level list of prop- -- of work that we have scoped
24 and planned, either -- some of it's completed, which is
25 from '23 through 2027. So then there's work that's been

1 scoped that is planned to completion through 2027.

2 This includes our overhead hardening work, our
3 undergrounding, and our remote grid line removal work.
4 And let me find the specific attachment for you. That's
5 in Attachment B of Exhibit PG&E-6, Chapter 7. And this
6 was recently updated on March 11, of 2026. So it's a
7 quite-recent view of the work that has been completed or
8 scoped to date.

9 The other, I think, very relevant record that
10 we've submitted is our alternative mitigation analysis.
11 And what that is our evaluation of the benefits versus
12 costs compared -- comparing the alternatives of overhead
13 hardening to undergrounding, based on a list of proj- --
14 at the circuit segment -- at the circuit level. We have
15 attached an exhibit as well -- I'm trying to find
16 exactly where on the record.

17 Do you know which one?

18 Q So while you're looking for that, so is it --
19 where does it -- in what you've cited, then where does
20 it -- so -- excuse me.

21 The work plan will say -- it will show the
22 undergrounding in terms of the timeline. But if we want
23 to know what is being done in a certain location, what
24 is -- is there a way to find that information?

25 A Yes. So, just to reiterate, we've described

1 the framework for how we select the work in our
2 testimony; right? In the opening testimony. But
3 that -- that work plan I'm referring to has a very
4 specific list of projects that have been scoped. It
5 includes the circuit, the circuit segment, information;
6 it has the location, the lat-long, including say the
7 city and county as well. So you can see exactly where
8 that work is taking place that's been scoped, along with
9 the mileage, the risk, and the timing that we expect
10 these jobs to be completed.

11 Q Okay. Hold on. Give me a minute.

12 Okay. All right. Let me shift to the
13 questions in the April 24th ruling.

14 Have you -- have you looked at those?

15 A Yes, your Honor.

16 Q Okay. So starting with 5.1:

17 What is PG&E's proposed cost and cost
18 recovery mechanism to continue funding for
19 undergrounding activities, after Test Year
20 2027, in the event the PG&E does not receive
21 Commission an EUP prior to 2028?

22 A Thank you, your Honor, for that question and
23 for the opportunity to answer these questions. I want
24 to recognize we're in, really, an unprecedented time as
25 we're transitioning the undergrounding program from the

1 GRC to the EUP. And I will say, given we've had the
2 opportunity to prepare responses, I do plan to read our
3 response, but offer to submit it in writing and also
4 welcome the opportunity for my colleague, Co-Witness
5 James Ash, to answer some follow-up questions you might
6 have.

7 Because in my response I do plan to reference
8 key dates and overlapping timelines, we did provide a
9 visual to the service list on Friday, that's marked as
10 Exhibit EX-47, that I think can help guide this
11 discussion for reference. So I do want to offer you
12 this time to pull that exhibit, if you have it, your
13 Honor.

14 Q Okay. When was this sent?

15 A Friday.

16 Q Friday. And what was the subject line?

17 A Let's see. One second.

18 Q And are you planning to make this an exhibit?

19 A It's -- your Honor, I --

20 MS. CHARIPAR: Yes, your Honor. We would -- we
21 were going to ask to move it into evidence after we
22 conduct this.

23 ALJ LARSEN: Okay.

24 WITNESS COLVIN: Kristin, I'm seeing this as
25 noted as visual aids or response to ALJ Ruling Question

1 5.1. I'm not sure if the subject line I have right --

2 MS. CHARIPAR: I am also trying to open my
3 Outlook right now to see how the email was addressed.
4 But my Outlook is not cooperating, so I apologize.

5 MR. MATTHEWS: Your Honor, Walker Matthews for
6 PG&E. I believe the email was sent on Friday at
7 2:31 p.m.

8 ALJ LARSEN: Okay. And what was the exhibit
9 number again?

10 WITNESS COLVIN: Exhibit 47.

11 ALJ LARSEN: Okay. Okay. I've got it.

12 WITNESS COLVIN: Great. Okay.

13 So I will start to say, at a high level, PG&E's
14 proposal regarding our undergrounding funding after
15 2027, is really designed to avoid any funding gap by
16 assigning cost recovery to demonstrated progress of the
17 EUP proceeding and not waiting for full approval of EUP,
18 and only using the proposed extension mechanism if
19 those -- if the critical milestones in the EUP have not
20 been met. And I'm going to walk you through this.

21 So, first, on this timeline starting at the top
22 of this line, we show the expected timing of the GRC
23 decision. That's in Q2 2037. The next three rows walk
24 through the key EUP milestones for the electrical
25 undergrounding plan, where there's different activities

1 occurring between PG&E Energy Safety and the Commission.
2 And this timeline that we've included here on these rows
3 are outlines based on the SB 884 statutory timeline for
4 the nine-month reviews by Energy Safety and the CPUC.
5 And this timing is anchored to our plan to file the EUP
6 in Q3 of this year.

7 Now, at the bottom of this line, we were
8 showing two potential cost recovery pathways. The first
9 is our preferred outcome of transitioning directly to
10 the EUP cost recovery in 2028; and, if needed, only
11 leveraging the extension mechanism through the annual
12 electric true-up or Tier 2 process.

13 So that's the visual that we've provided. And
14 I -- I'll still reference it.

15 But, again, first and foremost our preferred
16 outcome is a fully-approved EUP by both Energy Safety
17 and the Commission by early 2028. But, effective date
18 would be January 1st, 2028. And this effective date we
19 will include in our EUP when we file it. We see 2028 as
20 the EUP test year, sort of similar to GRCs, where
21 decisions have been reached after the start date.

22 And so, I'll note in our original test- -- in
23 our original proposal, in our opening testimony in
24 Exhibit PG&E-4, Chapter 7, we proposed an annual
25 extension mechanism that could be triggered if the EUP

1 is not approved by September 1st of the proceeding year,
2 given the uncertainty of this new proceeding with the
3 EUP. We did assume approval would be from both Energy
4 Safety and the CPUC.

5 And now, in other words, for other 2020 work,
6 specifically if the EUP is not approved by September 1st
7 of 2027, we could file an advice letter to trigger the
8 inclusion of an extension mechanism for miles and costs
9 of the 2028 rates. This trigger date of
10 September 21st, 2027, is shown on this last line of the
11 timeline slide here.

12 As we have shared in our April 10th response to
13 President Reynolds, and in our rebuttal testimony, based
14 on where we are today, we haven't been able to file the
15 EUP. There's been evolving guidelines. And the
16 introduction of the Joint IOU Application in the SPD-37
17 proceeding, which is also shown here on the CPUC line of
18 the EUP. This is despite guidelines having been
19 initiated years ago.

20 So, we know we can't afford further delays
21 transitioning to the SB 884 framework to support
22 undergrounding in the highest-risk areas is really the
23 best path to mitigate risk for the communities that we
24 serve. But we also recognize -- and based on recent
25 Commission direction, and as we've committed in our

1 rebuttal, we plan to file this EUP shortly in Q3 of this
2 year. And you can see that it is shown on the second
3 row of the visual.

4 So, since filing opening testimony, I will just
5 reiterate our proposal has evolved to focus on whether
6 sufficient procedural milestones demonstrate the EUP is
7 on track. And so, this is really shown on the two rows
8 in the EUP here. And -- so just to reiterate, we're
9 looking for significant procedural milestones
10 demonstrating the EUP is on track, rather than
11 originally requiring approval by both Energy Safety and
12 CPUC by a single date.

13 So, I'll walk you through these three
14 milestones. The first is: We are looking for a
15 resolution of the SPD-37 Joint Application A.26-02-005.
16 We're expecting, based on the current procedural
17 schedule, that this application is final and voted in
18 November of 2026. And as shown on this Energy Safety
19 row, we're seeking the second as the approval of the EUP
20 Phase 1 plan by Energy Safety. And we do expect that in
21 Q2 of 2027, based on the nine months of the statutory
22 timeline that we have in the EUP.

23 And, last, we will have two months to t file
24 our turn around and file our cost application for the
25 EUP with CPUC. And so, we're looking for progress in

1 the Commission's EUP Phase 2 cost-recovery plan, which
2 does begin two months after we get Energy Safety's
3 approval on the EUP.

4 And it's intended that we do file this plan
5 before the proposed extension mechanism trigger date of
6 September 1st. And so, what I want to reiterate is that
7 based on the anticipated progress towards the full
8 approval of the EUP by September 27th, we will have more
9 information on whether the EUP cost recovery application
10 at the CPUC is on track for an early 2028 decision.
11 But, you know, if those milestones indicate --
12 essentially, if those milestones indicate the EUP is on
13 track for an early '28 decision, and as I'm showing on
14 our preferred pathway on second-to-last row, we would
15 not submit an extension mechanism to ask for GRC funding
16 for undergrounding in 2028 and instead directly
17 transition directly to the EUP cost recovery. If though
18 the critical milestones are delayed, meaning by
19 September 1st, 2027, this point shown on the timeline,
20 and we don't have sufficient certainty of an early 2028
21 decision on the EUP, then we would seek to have -- use
22 the extension mechanism that's shown on the alternative
23 pathway to request continuation of funding to prevent an
24 interruption of the critical wildfire risk reduction
25 framework.

1 So, I'll just say: Our clear preference
2 remains to transition undergrounding cost recovery to an
3 approved EUP beginning in 2028. And the extension
4 mechanism really only exists as a backstop to manage the
5 potential timing misalignment, given there is so much
6 uncertainty on the EUP proceeding.

7 BY ALJ LARSEN:

8 Q Okay. And so that extension would be an
9 extension of the funding in -- for Test Year 2027; is
10 that right?

11 WITNESS COLVIN: So for 2027, we propose 307
12 miles. And in 2028, we've requested 400 miles in that
13 extension mechanism. And the details are listed in our
14 opening testimony; but its 400 miles was proposed for
15 2028, and even the future years if that's not, you
16 know -- if there's extensions beyond 2028.

17 Q Okay. Let me go to the next question then --

18 A Okay.

19 Q -- and you've probably touched on some of it.

20 If the Commission were to authorize any
21 funding for undergrounding projects after 2027
22 in this GRC, how should the Commission
23 condition any GRC approval for the post-test
24 years to ensure PG&E does not obtain
25 authorization to an EUP submitted under SB 884

1 to double recover costs for undergrounding
2 miles?

3 A Thank you for this question. We agree avoiding
4 double recovery is essential. And we do have,
5 currently, a robust project level accounting controls to
6 prevent double recovery. So each undergrounding job is
7 assigned a single unique order ID. And all those costs,
8 from planning through closeout, are recorded to that
9 full order number. We track those costs in SAP for each
10 undergrounding job that could only be assigned to one
11 single cost recovery account, which does prevent double
12 recovery. So, consistent with that structure, the EUP
13 revenue requirement would be based on specific projects
14 identified in the EUP filing and then assigned to that
15 specific cost recovery account, the EUP balancing
16 account in this case, beginning in 2028. And our
17 controls really would prevent double recovery.

18 So the Commission can reinforce that existing
19 control framework by requiring each project to be
20 associated with only one authorized cost recovery
21 mechanism, either the GRC bridge or the EUP but, you
22 know, not both. We also did describe this project
23 tracking framework in a discovery response to Cal
24 Advocates. And we propose to submit this response in
25 the record as a hearing exhibit, Exhibit 38; and that's

1 Cal Advocates' Question -- 99, Question 10.]

2 Q Okay. Let me go to the next question. If the
3 Commission were to authorize any funding for
4 undergrounding projects after 2027 in this GRC, should
5 this GRC apply the methodological outcomes adopted in
6 A.26-02-005 when reviewing any costs in this GRC, and
7 would doing so facilitate the goal of maintaining
8 efficiencies and enhancing certainty? If the goal is
9 facilitated, explain how.

10 A So I will say first and foremost, again, I want
11 to reiterate a preferred outcome is a fully approved EUP
12 by early 2028 with effective date of January 1st.

13 If that timing doesn't occur and the Commission
14 authorizes post-'27 undergrounding funding in this GRC,
15 what we're supporting is an approach that reasonably
16 transitions the selection framework between the two
17 proceedings.

18 And so the outcomes of Application 27-02-005,
19 which I'll also refer to as the "Joint Application,"
20 could potentially introduce novel benefit-cost ratio
21 methods in the EUP that may have substantial impacts to
22 the project selection framework for work planned in
23 2028.

24 And so given we need to start work on projects
25 years in advance to implement them and complete the

1 work, as I've outlined in our Exhibit PG&E-04,
2 Chapter 7, pages 7-25 to 7-28, what we're requesting is
3 that the 2026 -- the wildfire mitigation selection plan
4 criteria and the benefit-cost ratio method in our
5 current risk-based, decision-making framework remains
6 the governing standard for work executed in the
7 extension mechanism within the '27 GRC with limited
8 deviations, though, that are necessary to support this
9 transition.

10 And so we're -- explicit approval of this
11 approach with the limited deviations necessary would
12 minimize rework and support our shift to the EUP
13 framework where these new rules are being litigated.
14 And for context, there's a requirement in the EUP
15 Phase 1 plan to submit at least 25 projects to energy
16 safety in our filing, which we plan to file in Q3.

17 Part of these 25 projects -- we're required to
18 include some that are nominated on outage likelihood and
19 wildfire consequence thresholds which do not follow the
20 highest-to-lowest risk prioritization that we've
21 included in our '26 WMP Decision Tree.

22 To add because -- like, there's really an
23 uncertain outcome we'd expect in this Joint Application,
24 26-02-005. We have selected projects in 2028 that are
25 less likely to be impacted by the BCR method refinements

1 that are anticipated in this Joint IOU Application. And
2 as such, these projects have not strictly followed our
3 highest-to-lowest wildfire risk prioritization that is
4 in our '26 WMP selection approach.

5 Ultimately after the review of these first 25
6 projects that we submit with Energy Safety, we would
7 then be planning to select projects based on the highest
8 wildfire risk in the EUP but really need flexibility now
9 due to that aforementioned uncertainty and to move
10 forward with these initial set of projects in '28
11 because of Energy Safety's requirement to put together
12 the first portfolio of work, which is for their
13 assessment of the 10-year framework.

14 So I will note the BCR calculation that's used
15 for projects beyond 2027 is the BCR method that was
16 proposed by the Joint IOUs in this application,
17 26-02-005, and is consistent with the current
18 risk-based, decision-making framework. But accordingly,
19 if post-'27 funding is authorized, we would request the
20 Commission permit the limited variance from our '26 --

21 Q Okay. I think you may be answering some of the
22 next question.

23 A Oh, Okay.

24 Q So let me just ask the other questions.

25 A Okay.

1 Q What approaches could help ensure a consistent
2 framework for evaluating undergrounding projects and
3 limit the risk of parties seeking different venues to
4 achieve different outcomes?

5 A I think you're right I'm answering that. So
6 essentially what I'm highlighting is we need to
7 maintain this -- we need to have a consistent framework
8 that allows us time to transition to the EUP while
9 essentially being guided by the existing rules, which
10 right now is our '26 WMP and the risk-based,
11 decision-making framework.

12 But essentially, we also are looking to
13 transition to the 2028 program year anticipating some of
14 the changes for the EUP, and so we would recommend we be
15 guided by the existing rules, the date, which is the '26
16 WMP and the risk-based, decision-making framework but
17 essentially with some allowable deviations necessary to
18 support that transition.

19 And so some of the BCR -- the work that we've
20 selected for 2028 intends to be -- right now is proposed
21 using the method that we proposed in this Joint
22 Application, and it's consistent, again, with the
23 current risk-based, decision-making framework, but
24 that's being litigated now, so we can't necessarily
25 anticipate those outcomes.

1 So if post-'27 funding is authorized in this
2 GRC period, we would request the Commission permit this
3 variance from the '26 WMP selection criteria to deviate
4 from the highest-to-lowest risk selection for this
5 initial portfolio and then with the expectation that
6 there's full alignment to the EUP framework, including
7 the risk-based prioritization which would follow once
8 the EUP is effective.

9 Q Okay. The next question is, what is the
10 evidentiary support for PG&E's proposed cost and cost
11 recovery mechanism in 2027 and 2028 to 2030? And the
12 question says, "Please provide cites to specific
13 exhibits for each year."

14 I think we should actually add this question to
15 the next ruling so that you can respond to it in writing
16 rather than rattling off a bunch of exhibits right now.

17 A I think that's a great idea. It would take me
18 10 minutes.

19 Q Right. I have a follow-up question also. For
20 your preferred undergrounding funding mechanism shown on
21 the table --

22 A Yes.

23 Q -- in Exhibit 47, you anticipate that projects
24 will continue or will project construction stop at the
25 beginning of 2028 as you wait for EUP approval from

1 OEIS?

2 A Appreciate that question. Our intent is to not
3 stop the work in that short period, right, for what
4 would be potentially three to six months. We would be
5 looking again for those key milestones anticipated
6 throughout the course of the EUP proceeding where there
7 is the Joint IOU Application that is expected to be
8 under way. Our plan with Energy Safety should be
9 approved by then, and we will have already filed the
10 cost application with the Commission.

11 And so at this point, it is very hard to stop
12 work that has already been initiated, and so at this
13 point, our intent is to not just end our contracts
14 abruptly, but to evaluate our options based on the
15 information that we will have at the time.

16 Q Let me ask two more questions, and I think we
17 should take a break and then see if the other parties
18 have any questions to follow up on this.

19 I gather you're familiar with remote grids?

20 A We are.

21 Q Okay. How does PG&E decide whether to install
22 remote grids? And what I'm looking for is some
23 understanding of whether there's a break-even point, and
24 how does PG&E decide where that point is to install a
25 remote grid?

1 WITNESS ASH: Yes, your Honor. I'm happy to
2 take that question. It may help if you wish to follow
3 along with PG&E's system hardening Decision Tree that
4 can be found in -- let's see. I believe this is in
5 attachment -- one second -- for PG&E's rebuttal,
6 Exhibit 16, Chapter 7, Attachment A, our Wildfire
7 Mitigation Plan.

8 Q Okay.

9 A The Decision Tree starting on page 187 of the
10 WMP.

11 Q Okay.

12 A This outlines PG&E's process for how to select
13 our project's four-system hardening, and you can see
14 that from the top. We begin with our WDRM. The current
15 version of that is before. We select the
16 highest-risk-ranked projects available and put them on
17 the scoping table to consider what is the appropriate
18 mitigation for that circuit segment.

19 Early in that process our engineers identify
20 locations within that circuit segment that could be good
21 candidates for remote grids. And just to be crystal
22 clear, a remote grid is unique from data microgrid. A
23 remote grid is where we actually decommission the lines
24 and install a stand-alone power system to serve a few
25 customers in a remote area.

1 So the general criteria that would meet
2 a "let's look at this location closer for a potential
3 remote grid" would be about one-and-a-half to two miles
4 of lines that could be removed that are serving just a
5 small handful of customers with low load requirements,
6 so that would be flagged and assessed further for the
7 site-specific requirements of installing a remote grid
8 to serve those customers.

9 We can evaluate what it would take to acquire
10 the land, to even install the SPS, you know, what those
11 requirements would be and the overall cost. That is
12 built into our comparative cost-benefit analyses for the
13 various alternatives on that zone between remote grid,
14 overhead hardening, undergrounding.

15 Does that clarify your question?

16 Q Yes, so that's very helpful, yes. Thank you.
17 One other follow-up. Can you confirm whether the list
18 of projects in the chart differ between the GRC and the
19 anticipated EUP?

20 A Yes. So referring back to the timeline for
21 Exhibit 47, yes. The projects selected for 2028, our
22 expected and hopeful EUP start date, have been
23 strategically selected where those underground projects
24 would qualify under our expected EUP framework, as well
25 as the current accrued WMP Decision Tree.

1 So the projects are much the same, but, as
2 Ms. Colvin alluded to earlier, there are some specific
3 criteria for the initial 25 projects that will be filed
4 with our EUP that have required a slight deviation from
5 the first step in the Decision Tree where we select the
6 highest debatable risk-ranked project.

7 Q Another question. Regarding the period where
8 PG&E is requesting deviation from risk prioritization
9 that you mentioned, is PG&E able to prioritize certain
10 projects that PG&E anticipates to be the highest risk to
11 a limited extent?

12 A I think "to a limited extent" is the most
13 important part of that clarifying phrase. PG&E does
14 intend to execute our work and select the highest-risk
15 location in that fashion for work.

16 However, due to uncertainties in the ultimate
17 outcome of the Joint IOU Application for SPD-37, as well
18 as specific criteria for projects that meet, you know,
19 outage frequency thresholds, ignition telrisk
20 thresholds, some various EUP-specific criteria, we have
21 had to deviate from the 110 selection just for those
22 initial 25. But after that, we will proceed selecting
23 the highest-wildfire-risk work.

24 ALJ LARSEN: Okay. Let's go off the record.
25 We're off the record.

1 (Off the record.)

2 ALJ LARSEN: So we discussed that we will be
3 including in the ruling Question 5.4 from the April 24th
4 ruling along with a few additional questions, including
5 one that was just read to me that will be in the ruling,
6 and then there's one more from TURN, and so go ahead.

7 MS. GOODSON: The second question, your
8 Honor -- Hayley Goodson for TURN -- is under PG&E's GRC
9 request --

10 ALJ LARSEN: Wait, wait, wait, "under PG&E's
11 GRC request."

12 MS. GOODSON: -- when would the capital
13 expenditures associated with 2027 overhead system
14 hardening and 2027 undergrounding miles impact the
15 revenue requirement.

16 ALJ LARSEN: Okay.

17 MS. GOODSON: Your Honor, you had asked whether
18 parties had any other questions, and I have one more
19 question, which is for you, and it's a procedural
20 question. I want to make sure that TURN is prepared to
21 comply with your Honor's expectations regarding
22 submissions in response to your April 24th ruling.

23 We are planning on Monday, May 18th, to provide
24 written responses to the information PG&E provided in
25 response to your April 24th ruling; however, today you

1 have clarified that the expectation that PG&E will
2 provide a written response to Question 5.4 in that
3 ruling, which parties have not received yet, and
4 additionally respond to new questions that your Honors
5 will put forth in a ruling shortly.

6 So my question for you is whether you would
7 prefer that parties delay the submission we're planning
8 to make on May 18th in order to respond to all of the
9 material that PG&E will be providing in response to your
10 questions at one time or whether we should proceed with
11 our May 18th response to the written materials provided
12 thus far, and then submit a second responsive submission
13 to the new information that will be forthcoming from
14 PG&E.

15 ALJ LARSEN: Okay. We'll get back to you on
16 that.

17 MS. GOODSON: Thank you, your Honor.

18 ALJ LARSEN: All right. And then MGRA.

19 MR. MITCHELL: No further questions from MGRA,
20 your Honor. Thank you.

21 ALJ LARSEN: Okay. So then with these
22 additional questions which will go in the ruling, are
23 there any other follow-up questions to what was
24 presented just now by the panel?

25 (No response.)

1 ALJ LARSEN: No. Okay. Oh, Ms. Shek, go
2 ahead.

3 MS. SHEK: Apologies. Selina Shek for
4 Cal Advocates again. Just to clarify, for Questions 5.1
5 to 5.3, if Cal Advocates does have a response that they
6 would like to provide to those questions, would we also
7 present those under the May 18th deadline?

8 ALJ LARSEN: Yes. I think we invited in the
9 ruling other parties to provide testimony on those as
10 well.

11 MS. SHEK: Thank you.

12 ALJ LARSEN: So, yes. So we do want to move on
13 to the last witness and try to finish today and stay on
14 schedule. So with that, I think we're ready to -- oh,
15 and I have one more hand.

16 Ms. Fall?

17 MS. FALL: Yes, your Honor. I would need to
18 move into the record our exhibits. We haven't done that
19 yet.

20 ALJ LARSEN: Okay. Let's go ahead and do that.

21 MS. FALL: TURN would like to move in the
22 exhibits identified TURN-502 and 503.

23 ALJ LARSEN: Okay. Hold on. Those are
24 identified on the exhibit list. They are so marked and
25 identified on the exhibit list served last night.

1 Any objections to the admission of TURN-502 and
2 TURN-503?

3 MS. CHARIPAR: No, your Honor.

4 ALJ LARSEN: All right. TURN's Exhibits 502
5 and 503 are admitted.

6 MS. FALL: Thank you.

7 (Exhibits TURN-502, TURN-503 were received
8 into evidence.)

9 MS. CHARIPAR: Your Honor, I was hoping that
10 we'd still have an opportunity for a very brief
11 redirect.

12 ALJ LARSEN: Okay.

13 MS. CHARIPAR: I have a couple questions that
14 you had raised. I would need four minutes to consult
15 with my witnesses.

16 ALJ LARSEN: Okay. And Mr. Mitchell?

17 MR. MITCHELL: Yes. MGRA would like to move
18 its cross-exhibits into the record.

19 ALJ LARSEN: Let's do that, and then we'll take
20 a five-minute break.

21 MR. MITCHELL: MGRA moves to admit Exhibits
22 MGRA Ex-03, MGRA Ex-04, MGRA Ex-05, MGRA Ex-06-E1,
23 MGRA Ex-07, and MGRA Ex-09.

24 ALJ LARSEN: Okay. Those exhibits are so
25 marked and identified on the recent exhibit list.

1 Any objections to those exhibits?

2 MS. CHARIPAR: No, your Honor.

3 ALJ LARSEN: MGRA's Exhibits 03 through 07 and
4 09 as marked and identified are admitted into evidence.

5 (Exhibits MGRA Ex-03, MGRA Ex-04, MGRA Ex-05
6 were received into evidence.)

7 (Exhibit MGRA Ex-06-E1 was received into
8 evidence.)

9 (Exhibit MGRA Ex-07 was received into
10 evidence.)

11 (Exhibit MGRA Ex-09 was received into
12 evidence.)

13 ALJ LARSEN: All right. We are off the record.
14 We're coming back at 3:25 for a little bit of redirect,
15 and then we'll shift to the next witness.]

16 (Off the record.)

17 ALJ LARSEN: We're back on the record.

18 It's 3:25. One other item is that we -- after
19 looking at the record a little bit, we've decided we
20 don't have any questions or need for clarifying the AMI
21 issues. So we're excusing the AMI panel and -- or not
22 asking them to come back.

23 Okay. With that, Ms. Charipar, go ahead with
24 your redirect.

25 MS. CHARIPAR: Thank you, your Honor. We

1 actually conferred. We do not need to proceed with
2 redirect. So instead I would like to move for admission
3 into the record PG&E EX-47, which were the visual aids
4 that were discussed today.

5 ALJ LARSEN: Mm-hmm. Okay. Is that it?
6 EX-47?

7 MS. CHARIPAR: That's all for me for now, yes.

8 ALJ LARSEN: All right. Any objections to PG&E
9 Exhibit 47 as marked and identified on the -- by ruling
10 this morning?

11 (No response.)

12 ALJ LARSEN: All right. PG&E Exhibit 47 is
13 admitted.

14 (Exhibit PG&E-47 was received into evidence.)

15 ALJ LARSEN: All right then. Do we need --
16 Mr. Cheng?

17 MR. CHENG: Thank you, your Honor. Can I just
18 ask a clarifying procedural question about what you
19 said?

20 ALJ LARSEN: Yes.

21 MR. CHENG: So will you -- will your Honor be
22 proceeding with the written question in the ALJ ruling
23 instead of asking the witnesses to come back? Is that
24 the plan?

25 ALJ LARSEN: Well, we just -- we just don't

1 feel like we need the witnesses to come back. We do
2 have a revenue requirement. We are proceeding to add
3 that question to the ruling.

4 MR. CHENG: Okay. Thank you, your Honor.

5 Yeah. We had discussed earlier this morning a question
6 to be added to the ruling. I just wanted to confirm
7 that's the still the case.

8 ALJ LARSEN: Yes.

9 MR. CHENG: Okay. Thank you, your Honor.

10 ALJ LARSEN: Okay. All right.

11 Let's go off the record again.

12 (Off the record.)

13 ALJ GRUEN: Let's go back on the record.

14 All right. Transitioning to TURN's witness,
15 Mr. Florio. First let me swear you in.

16 Mr. Florio, would you please raise your right
17 hand.

18 MR. FLORIO: (Witness complying.)

19 ALJ GRUEN: Do you swear or affirm under
20 penalty of perjury that the testimony you are about to
21 give shall be the truth, the whole truth and nothing but
22 the truth?

23 MR. FLORIO: I do.

24 ALJ GRUEN: Thank you. And Mr. Florio, in your
25 capacity as a witness here, do you agree to the witness

1 attestations that have been discussed earlier in this
2 proceeding?

3 MR. FLORIO: Yes, I do, your Honor.

4 ALJ GRUEN: Okay. Thank you.

5 MICHEL PETER FLORIO,
6 called as a witness by The Utility Reform
7 Network, having been sworn, testified as
8 follows:

9 ALJ GRUEN: Ms. Goodson, do you want to proceed
10 with direct?

11 MS. GOODSON: Yes. Hayley Goodson for TURN.
12 Thank you, your Honor. TURN calls Witness Mike Florio.

13 DIRECT EXAMINATION

14 BY MS. GOODSON:

15 Q Mr. Florio, good afternoon. Would you please
16 spell your complete name and provide your business
17 address.

18 A Yes. My name is Michel Peter Florio. First
19 name spelled M-i-c-h-e-l, Peter, P-e-t-e-r, Florio,
20 F-l-o-r-i-o. My business address is 7823 Crest Avenue,
21 Oakland, California, 94605.

22 Q Thank you. And Mr. Florio, would you please
23 provide a brief summary of your experience that is
24 relevant to your testimony in this proceeding?

25 A Okay. Well, I graduated in 1978 with a law

1 degree from New York University and a master's in public
2 affairs from the School of Public and International
3 Affairs at Princeton University. I started at TURN in
4 the fall of 1978. I guess that's 48 years ago. Started
5 working on gas cases in 1979 and have been involved in
6 virtually every major gas proceeding in California since
7 then.

8 In the mid-90s, during electric restructuring,
9 I was selected as a residential consumer representative
10 on the initial boards of the California Independent
11 System Operator and the California Power Exchange.
12 Those were part-time positions while I continued to work
13 at TURN. I stayed on the ISO board until 2005,
14 continued to work at TURN. In January of 2011, I was
15 appointed as a commissioner of the CPUC, served in that
16 role through the end of 2016.

17 Since then, I've been a consultant on ISO and
18 CPUC issues as well as related civil litigation. I
19 first worked for TURN after beginning my consulting on
20 the negotiations that led to the Memorandum of
21 Understanding on PG&E's natural gas storage strategy and
22 have been involved in all PG&E gas matters since then.

23 Q Thank you, Mr. Florio. And in this proceeding,
24 you are sponsoring a couple of different exhibits. I'm
25 going to go through those. The first is TURN Exhibit 6,

1 which is your direct testimony. And there is also a
2 confidential version called TURN Exhibit 6C, like
3 confidential. And in TURN Exhibit 6 and TURN
4 Exhibit 6C, you are sponsoring all but Section 3C, which
5 is sponsored by Witness Jalal Awan; is that correct?

6 A That is correct.

7 MS. GOODSON: And your Honor, I will clarify
8 for you that among the exhibits Mr. Florio is
9 sponsoring, there are two confidential exhibits, and
10 they do not appear in the hearing's electronic exhibit
11 list distributed by PG&E. But I am working with PG&E to
12 resolve that, and they will be added to the exhibit --
13 to the versions circulated later today.

14 ALJ GRUEN: Understood. Thank you,
15 Ms. Goodson, for that clarification.

16 MS. GOODSON: Sure.

17 BY MS. GOODSON:

18 Q And Mr. Florio, the second document that you
19 are sponsoring has been identified as TURN Exhibit
20 6-Attach 1, which contains the attachments to your
21 testimony; is that correct?

22 A Yes, that's also correct.

23 Q And the final is TURN Exhibit 6 Workpapers, and
24 there's also a confidential version, TURN Exhibit 6C
25 Workpapers. And these are the workpapers that support

1 your direct testimony; is that correct?

2 A That's correct. And all of the confidential
3 material relates to Dr. Awan's testimony. So nothing of
4 mine is confidential.

5 Q Thank you. And did you prepare the exhibits
6 you are sponsoring other than the proportions prepared
7 by Jalal Awan?

8 A Yes.

9 Q And do you have any changes, corrections or
10 additions to make to your testimony?

11 A Just one. I would say more an update than a
12 correction. On page 5 of TURN Exhibit 6, just above the
13 heading in dark print starting with "B," it says, "The
14 uncontested PDSS settlement in A.24-07-020 is currently
15 pending Commission approval." Just wanted to note that
16 the proposed decision has been issued approving the
17 settlement, and it is on the Commission's consent agenda
18 for the day-after-tomorrow meeting. That's all.

19 Q Thank you, Mr. Florio. And to the extent your
20 testimony contains factual assertions, are those
21 assertions true and correct to the best of your
22 knowledge?

23 A Yes.

24 Q To the extent your testimony contains expert
25 opinions, are those opinions consistent with your best

1 professional judgment?

2 A Yes.

3 MS. GOODSON: Your Honor, this witness is ready
4 for cross-examination.

5 ALJ GRUEN: Thank you, Ms. Goodson.

6 Mr. Ouborg, do you wish to proceed with
7 cross-examination?

8 MR. OUBORG: Yes, your Honor. Thank you.

9 CROSS-EXAMINATION

10 BY MR. OUBORG:

11 Q Good afternoon, Mr. Florio.

12 A Good afternoon.

13 Q I wanted to start by referring you to what is
14 being labeled Exhibit PG&E-45. Do you have that? Can
15 you let me know when you are there?

16 A Yes, I have that.

17 Q And that exhibit contains a letter from PG&E to
18 the California Geologic Energy Management Division known
19 as CalGEM, C-a-l capital G, capital E, capital M, which
20 is the agency that sets integrity and safety regulations
21 for PG&E's gas storage facilities.

22 A Yes, I have that.

23 Q Yes. And that letter is dated December 8th,
24 2025. PG&E provided this letter to TURN as part of --
25 in response to TURN discovery request for PG&E's

1 correspondence with CalGEM?

2 A Yes.

3 Q Have you -- have you reviewed the CalGEM
4 letter?

5 A Yes, I have.

6 Q Okay. And in the letter, PG&E responds to
7 CalGEM's adoption of seven-year well reinspection
8 frequency and rejected PG&E's alternative approach that
9 would only inspect wells every 12 to 15 years, among
10 other things, but is that a correct statement?

11 A Yes.

12 Q Okay. And the letter also brings to CalGEM's
13 attention and attaches to the letter two expert studies
14 conducted by engineering consultants Exponent and Blade
15 Energy Partners. And these studies were also provided
16 to TURN in discovery and are included in what is being
17 labeled Exhibit PG&E-39 and PG&E -- Exhibit PG&E-14?

18 A Yes, that's correct.

19 Q Have you reviewed those studies?

20 A I didn't read them word-for-word, but I skimmed
21 over them and got the gist of them and agree with them.

22 Q Okay. And would it be fair to say that on a
23 high level the studies find that CalGEM's seven-year
24 reinspection interval is not necessary for safety of the
25 wells and could, in fact, result in damage to the wells

1 and may introduce incremental risk to the facilities?

2 A Yes.

3 Q Okay. And do you also agree that they
4 generally find that PG&E's alternative risk inspection
5 approach is reasonable?

6 A Yes.

7 Q Okay. Thank you. Next could you refer to what
8 has been labeled Exhibit PG&E-35, and let me know when
9 you're there.

10 A Yes, I have it.

11 Q Yeah. And this exhibit contains an article by
12 the publication called CalMatters, one word, C-a-l,
13 capital, M-a-t-t-e-r-s, and the article is titled
14 Utilities Commission Explores Ways to Mitigate High
15 Natural Gas Prices, dated February 8th, 2023. And --

16 A Yes, I have that.

17 Q Okay. And if you could turn to the last page
18 of that exhibit, and you'll see some highlighted text,
19 which I highlighted, where the article purports to
20 summarize an interview with you. And according to
21 CalMatters, you expressed the opinion that CalGEM's
22 regulations are excessive, too strict and that they've
23 created a price problem.

24 And then the other thing it says is that you
25 express the opinion that the California Public Utilities

1 Commission, that it sets rates in CalGEM that
2 promulgates these regulations should get, quote, "on the
3 same page." Since these regulations should be
4 reasonable, the cost should be reasonable and that this
5 may even require escalation as high as the governor's
6 office.

7 Is that also a correct characterization of ...

8 A Yes. I would say, you know, this wasn't
9 testimony under oath. It was a kind of out-of-the-blue
10 interview with a reporter, but I -- I think it's
11 generally an accurate characterization of what I said.

12 Q Okay. And this was 2023. If I may use the
13 characterization -- you correct me if I'm wrong -- you
14 still -- you still believe that the CalGEM regulations
15 are, quote, "excessive" and, quote, "too strict"?

16 A Yes.

17 Q And do you still believe these regulations
18 created a pricing problem?

19 A Yes. And let me clarify. It really is a
20 pricing problem in two respects. One is that because of
21 the well outages that are required by the regulations
22 PG&E has had to drill additional wells, which increase
23 rates for customers, and at the same time, they can
24 contribute to high commodity prices if there isn't
25 sufficient storage to -- to meet customers' needs.

1 That was not so much the problem in the price
2 spike situation we're talking about here because there
3 was a lot of unused storage, not so much at PG&E but at
4 the independent storage providers that -- you know, the
5 market participants didn't fill the storage. So there
6 was actually enough storage capacity. It just wasn't
7 used by the market.

8 Q Thank you for that. Could you turn next,
9 Mr. Florio, to Exhibit PG&E-34. And let me know when
10 you're there.

11 A Yes, I'm there.

12 Q And this exhibit is a page from the transcript
13 in the 2023 GRC. I think this is your cross-examination
14 of Ms. Redmond, PG&E's storage --

15 A Yes.

16 Q -- witness? And I've highlighted some of the
17 lines that -- of an exchange between you and Ms. Redmond
18 where on line two you ask her:

19 So it's PG&E's view that doing such a
20 frequent casing inspection really isn't
21 necessary and might be harmful, correct?

22 To which she -- to which she -- Ms. Redmond
23 responds:

24 Yes. It's also supported by research that
25 overly frequent casing inspections can cause

1 greater harm to the asset than good.

2 Then you ask a question on pa -- on line 9:

3 Would it be helpful for PG&E or the
4 Commission to get involved in these discussions
5 with CalGEM?

6 To which Ms. Redmond responds:

7 I believe it would be useful for the
8 parties impacted by the decisions and the
9 regulations to be at the table because it's not
10 just performing the well work. It has
11 implications for ratepayers and the entire
12 energy system.

13 And your response to that was:

14 Let us know when and where.

15 Do you remember that testimony -- or that
16 cross-examination?

17 A Yes. And I also remember Ms. Redmond saying on
18 line 19, "I'll send you an invite," which I never
19 received.

20 Q Okay. Thank you for that. So maybe this --
21 you already answered this question, but since that time,
22 have you or TURN taken any steps to make your views
23 known to CalGEM, the Commission or even to the
24 governor's office as you stated in the CalMatters
25 interview might be necessary?

1 A I have not. I was, you know, hoping I would
2 hear something from PG&E, and as I indicated, I never
3 did. So I don't just randomly call up the governor's
4 office and give them my opinion, but I was hopeful that
5 the PUC and PG&E were doing something. If I were still
6 on the Commission, I certainly would have expressed my
7 views, but as just a private citizen, I got no such
8 invitation.

9 Q Thank you. Are you still -- would you still be
10 willing to support PG&E in its ongoing efforts to have
11 these regulations made more reasonable?

12 A Yes.

13 Q Okay. Thank you. We'll send you an invite.

14 All right. I want to move onto a different
15 topic. I want to talk about well attrition if no new
16 wells are drilled.

17 A Yeah.

18 Q And the first one is to just confirm your
19 testimony on this. Generally -- I mean specifically,
20 your testimony, you recommend that the Commission find
21 that PG&E will have no need to drill new storage wells
22 during this GRC cycle and that the Commission should
23 adopt the forecast of zero dollars for that purpose.

24 Is that generally correct?

25 A That's correct. And let me explain. In coming

1 to that conclusion, I took into account PG&E's forecast
2 of what withdrawal capability would be available if
3 CalGEM insisted on the seven-year cycle. So I took
4 PG&E's word on that.

5 And then I looked at the demand side of the
6 peak-day supply standard and, as indicated in the
7 testimony, believe that the electric generation forecast
8 is overstated, the core demand forecast is overstated as
9 indicated by Dr. Awan, and that reserve capacity, at
10 least at the full quantity, currently reserved is not no
11 longer necessary.

12 So given all of those, even with the
13 restrictions that CalGEM has imposed, I concluded that
14 there was an ample margin of safety with the existing
15 withdrawal capacity.

16 Q Thank you for that. Can you turn to PG&E --
17 Exhibit PG&E-36, please. And let me know when you're
18 there.

19 A Yes, I have that.

20 Q And this is simply a cross-examination exhibit.
21 It's a copy of page 7-25 of PG&E's opening testimony,
22 and specifically, I wanted to talk about the table,
23 Table 7-5. And I've highlighted a row of that table
24 that I wanted to focus on specifically. So firstly,
25 that row -- row 7-5 is labeled Anticipated Storage Well

1 Withdrawal Capacity for 7-year reinspection interval.

2 And I think you've already confirmed this, but
3 can you confirm your understanding that CalGEM has
4 adopted the 7-year reinspection requirement?

5 A Yes. Pending PG&E's appeal, if we could call
6 it that.

7 Q Right. And -- and it's your understanding that
8 row 4 represents PG&E's forecast of storage well
9 withdrawal capacity in the absence of any new wells
10 being drilled, and --

11 A That's --

12 Q -- assuming CalGEM's 7-year inspection
13 interval?

14 A That's correct.

15 Q And given the assumptions that -- sorry. And
16 if you -- if one were to -- assuming this forecast is
17 correct that you just put forth for the purposes of this
18 discussion, is it fair to say that looking at the
19 numbers -- and there's a number for each year, '27
20 through 2030, that the well withdrawal capacity
21 forecasted by PG&E declines over the 4 years by over
22 700 -- 70, rather -- over 70 MMcf per day, which is --]

23 A Yes. And it also declines year over year,
24 under PG&E's risk-based assessment as well on line 8

25 Q Mm-hm. Right. I see that.

1 So, um, it's -- is it your understanding that
2 PG&E is proposing to draw eight new wells in this rate
3 case cycle?

4 A That's my understanding.

5 Q And if we take the assumption of line two of
6 the table, that each well adds 12 MMcf per a day of new
7 capacity. 8 new wells would equate to 96 MMcf per a
8 day, if PG&E received the funding and drilled all eight
9 wells?

10 A Yes.

11 Q Okay. And if we add 96 to 705, which is the
12 forecast withdrawal in 2030, you get about 801 --

13 A Yes.

14 Q -- and -- and that is slightly lower than the
15 777 forecast in '27. It's -- but it generally brings --
16 under the assumptions of this table, brings back
17 withdrawal more or less to where it started?

18 A Yes. But you also have to look at line 1 of
19 the table, the withdrawal needed from PG&E's storage.
20 And that -- that's where we're not in agreement is --

21 Q Yes.

22 A -- I believe those numbers should be
23 significantly lower than that, as reflected in -- in my
24 PDSS table.

25 Q Yes. I -- I understand that we -- we have our

1 forecast of the withdrawal needed. You have yours. And
2 that's all laid out in our testimony.

3 A Yes.

4 Q But just getting back to the -- the well --
5 declining well withdrawal and the new wells.

6 Is it fair to say that PG&E's proposal could be
7 viewed as simply main- -- more or less maintaining
8 current withdrawal capacity and not letting it decline?

9 A Approximately.

10 Q Okay. Viewed in that -- through that lens
11 Mr. Florio, do you think it's prudent to let the
12 deliverability of the withdrawal capacity decline and
13 not at least maintain its given -- all the uncertainties
14 we face about future storage needs.

15 A Well, I took that -- all those uncertainties
16 into account in my testimony and concluded that the
17 amount that's needed is significantly less than what
18 PG&E has forecast, which -- and I believed in the last
19 case as well and so testified. Particularly, with
20 respect to reserve capacity, the new curtailment rules
21 that have now been adopted and will be implemented this
22 fall, that's currently a 250 MMcfd reservation. And,
23 you know, I and other parties believe that could be
24 eliminated -- or I've suggested at least cut in half.
25 And that would more than make up for this decline that

1 you've pointed to on line 4.

2 Q All right. I understand that, Mr. Florio. And
3 like -- like I said, we have our view, and it's in the
4 testimony --

5 A Yeah.

6 Q -- and you have yours, and it's definitely in
7 the record.

8 A Yes.

9 Q I would like to turn now to the topic of the
10 Gas Storage Balancing Account, also known as the GSBA?

11 ALJ GRUEN: Excuse me.

12 Mr. Ouborg, just -- I'm sorry to interrupt.

13 Just for benefit of the court reporters, do you have a
14 sense of how much longer you would like to proceed with
15 cross since we're just past 4:00?

16 MR. OUBORG: I think I may have another half an
17 hour, your Honor.

18 ALJ GRUEN: Okay. Let -- let's --

19 MR. OUBORG: I can try for 20 minutes, if
20 Mr. Florio is unusually cooperative.

21 ALJ GRUEN: All right. Why don't you go ahead
22 with your next line of questioning.

23 Go ahead, Mr. Ouborg.

24 MR. OUBORG: Thank you, your Honor.

25 Q The Gas Storage Balancing Account, or GSBA, was

1 adopted in the 2019 GT&S and was continued in the 2023
2 GRC, generally in recognition of the uncertainty around
3 storage costs, generally.

4 All storage costs can be recorded into that
5 account; and PG&E is required to present those costs for
6 a reasonableness review. Is that a general --

7 A Yes.

8 Q -- summary of where we are?

9 A Yes.

10 Q And both in the 2019 GT&S case and the 2023
11 GRC, TURN supported the GSBA; is that correct?

12 A That is correct.

13 Q And in this testimony, you're recommending that
14 the GSBA now be closed starting in 2017. And the main
15 reason you give for this is that -- you assert that most
16 of the regulatory uncertainty is now being resolved in
17 one way or the other.

18 Is that best --

19 A Yes. And PG&E also has considerable experience
20 with the work that CalGEM has required, so -- and when
21 going back to the beginning, and you were installing
22 tuber and packer into these wells, and you didn't really
23 know what was the going to involve and, you know,
24 there's -- there's much more experience. We've got,
25 what, about eight years of experience under -- under our

1 belts now. So, I think it's -- it's time to return to
2 traditional ratemaking.

3 Q Okay. So I just want to talk about the
4 different categories of uncertainty quickly. The -- is
5 it your understanding, I think we've talked about this
6 already, that PG&E continues to engage with CalGEM on
7 the regulations and that changes could slowly occur?

8 A I remain hopeful, but not confident, because
9 this argument has been going for eight years. And they
10 just, a year ago, made their ruling. So, I think it's
11 pretty optimistic to hope it's going to change at this
12 point.

13 Q And if certain regulations are relaxed, it's
14 possible that some of the forecasted costs could
15 decline?

16 A Yes. Yes.

17 Q And we -- you also talked about your opinion a
18 minute ago, that we have a lot more experience for these
19 regulations. But, I mean, don't you agree that until
20 there's more experience with some of these requirements,
21 the impacts on gas operations of these requirements, as
22 they become regular -- a regular part of operations, is
23 still uncertain. And, specifically, you mention in the
24 Cal Matters article, you point to the fact that well
25 outages, for example, are unpredictable; and in some

1 cases, a well can be out of service for a year.

2 So don't you think there's still some
3 uncertainty with the impacts these regulations are going
4 to have as they get implemented going out into the next
5 rate case?

6 A There's some uncertainty; but that's true of
7 all aspects of utility operations, that there -- you
8 know, there are uncertainties about undergrounding;
9 there are uncertainties about pipeline integrity
10 testing. And, you know, we deal with those through --
11 for the most part, through traditional ratemaking. And
12 I think the situation has stabilized enough, with
13 respect to storage, that we can get back to that
14 rational ratemaking framework.

15 Q Is it your understanding that the physical
16 nature of storage well operations involves performing
17 work up to a mile below the surface of the earth in a
18 relatively small diameter hole, and it involves
19 high-pressure gas?

20 A Yes.

21 Q And do you -- do you have an opinion about
22 whether these challenges in performing the work can
23 create a high degree of uncertainty in forecasting the
24 scope and cost of well projects, for example, such as
25 reworks?

1 A There's uncertainty. But I believe you've
2 completed something like 93 of them, as of the data
3 that's in the record of this case. So, you know, if --
4 if that's not enough experience, I -- I don't know what
5 would be.

6 Q Thank you for that.

7 And, finally, you and I have talked several
8 times already today about the peak day -- demand on a
9 peak day and how large that should be. And TURN has its
10 view, PG&E has its view, other intervenors have
11 different views. But isn't it fair to say that that
12 forecasting exercise is based on many, many assumptions,
13 all of which could be wrong -- I think it would be fair
14 to say all of us would be wrong to some extent -- but
15 isn't that a significant uncertainty that continues?

16 A Well, you know, certainly demand is always
17 uncertain. But, you know, the level of demand that PG&E
18 is forecasting on a peak day is something that basically
19 has not been seen in -- in recent history. And, yes, it
20 could always be a little colder than it was under the
21 assumption. But again, there's plenty of cushion there
22 that -- you know, it -- and generally speaking,
23 temperatures are warming. And, you know, it -- you
24 know, PG&E's own forecasts indicate that gas demand is
25 declining and will continue to decline. And Commission

1 policy is strongly encouraging that.

2 So, you know, we have to balance that
3 uncertainty with the fact that money that's invested in
4 expanding gas system capacity today could very well
5 become stranded in the not too distant future, as demand
6 continues to decline. So, I think it -- and I've said
7 in other context that every expenditure of capital on
8 the gas system has to be looked at skeptically when
9 we're in the midst of a transition to reduce or
10 dependence on that system.

11 Q Thank you, Mr. Florio.

12 Given that there's still some continuing
13 uncertainty, why doesn't maintaining the GSBA make sense
14 for both ratepayers and for PG&E?

15 I mean, if we spend less, then ratepayers would
16 benefit through the balancing account; and if PG&E, due
17 to some of the these different factors coming to light,
18 and the need for spending, if that occurs, then PG&E can
19 do that; and subject, obviously, to a showing of
20 reasonableness, still can use the account to -- as a
21 vehicle to recover costs. I mean, doesn't that -- isn't
22 that a reasonable approach?

23 A Well, in my experience, only 48 years,
24 reasonableness review is minimal protection for
25 ratepayers. Because it's just extremely difficult to

1 convince the Commission that money that the utility has
2 already spent should not be recovered. You have all the
3 information and intervenors have to try to extract it
4 through discovery.

5 So, I don't -- I'd -- it's important that it's
6 there. But it's a pretty, you know, weak tool in the
7 ratepayers' tool box. And I think traditional
8 ratemaking provides important incentives to the utility
9 to try to minimize its costs, which you don't have when
10 there's a balancing account, and everything is
11 passthrough. So, again, it's -- you know, I've
12 supported this for two rate case cycles now. And I --
13 it's just my opinion that it's been long enough. And we
14 can get back to traditional ratemaking.

15 Q I would like to move on to another topic, which
16 I hope is a quick one, Mr. Florio. This is -- I want to
17 turn to the subject of through-tubing inspections --

18 A Mm-hm.

19 Q -- and these are the kind of inspection for
20 integrity of a well. In your testimony, you say that:

21 Given CalGEM's position, that
22 through-tubing inspections are no longer
23 required, I recommend reducing the forecast for
24 this line item to zero.

25 Do you recall that testimony?

1 A Yes.

2 Q And if you could turn to Exhibit PG&E-41, and
3 let me know when you're there?

4 A Yes. I have that.

5 Q And this is a response by TURN to a discovery
6 request by PG&E. And PG&E begins its question by saying
7 that these through-tubing surveys are a part of PG&E's
8 integrity management practices and allow for diagnostic
9 investigation of integrity concerns relating to well
10 casing and tubing wall thickness. These tools are run
11 at the completion of a well rework inspection to reset
12 the baseline of through-tubing data for the well. And
13 then, PG&E invites TURN to reconsider, in light of this
14 additional explanation of the role that these surveys
15 play.

16 And you respond in the last line of the data
17 response that:

18 Pending potential additional discovery and
19 TURN's review of PG&E's rebuttal testimony,
20 TURN will consider whether a small number of
21 through-tubing inspections per a year would be
22 reasonable.

23 Have you done so, and do you have an
24 alternative recommendation --

25 A Yes --

1 Q -- for the number --

2 (Reporter clarification.)

3 MR. OUBORG: For the number that would be
4 reasonable.

5 THE WITNESS: Yes. The -- the estimated costs,
6 as shown in the workpapers, is around \$30,000 for one of
7 these tests. And I think 30,000 times the number of
8 reworks that the Commission authorizes in its decision
9 would be a reasonable allowance for these tests.

10 Q Okay.

11 A I think doing them after a rework makes sense
12 for the reasons you've indicated, and so it's really --
13 the cost is -- the unit cost is not in dispute. And
14 it's just however many reworks the Commission chooses to
15 authorize; you know, they should include this additional
16 30,000 per rework as -- as an expense item.

17 Q Thank you.

18 Finally, Mr. Florio, I would like to talk about
19 the definition of what's known as "the reliability
20 standard," which is now called the "peak day supply
21 standard," the purp- -- and the purposes of reserve
22 capacity.

23 A Yes.

24 Q And can you confirm that your recommendation
25 for reserve capacity is that you are proposing that

1 reserve capacity be eliminated in this rate case, and
2 that instead PG&E utilize non-core -- it's
3 newly-approved non-core curtailment system that can be
4 employed during the types of conditions for which
5 reserve capacity was originally designed?

6 Do you recall that testimony?

7 A Yes.

8 Q And can you turn to what is being identified as
9 PG&E -- Exhibit PG&E-32, and let me know when you're
10 there?

11 A 52.

12 Q 32.

13 A Oh, okay. Yes, I have that.

14 Q And this is an excerpt from decision -- the
15 2019 GT&S decision. And I wondered if you could turn to
16 page 29 of the decision that's in that -- in the
17 exhibit.

18 A I see that.

19 Q And then, I highlighted where the Commission
20 discusses the objective of the reliability standard that
21 PG&E must meet. And the Commission said there:

22 The objective of the reliability standard
23 is for PG&E to be able to meet load
24 requirements for gas service on a day when
25 there is a high customer demand for gas, a

1 major system outage on its gas transmission
2 system, and a significant storage inventory
3 imbalance.

4 Do you see that?

5 A Yes.

6 Q And would you agree that in the 2019 GT&S case,
7 the --

8 (Audio failure.)

9 ALJ GRUEN: I'm sorry. I don't -- Mr. Ouborg,
10 just to clarify, I couldn't hear, I think, the last 10
11 seconds of the question.

12 Do you want to restate the question?

13 MR. OUBORG: Can you hear me now?

14 ALJ GRUEN: Yes. I can. And I'm seeing the
15 court reporter nod as well.

16 Please go ahead.

17 BY MR. OUBORG:

18 Q So my question for Mr. Florio is: Would you
19 agree that in the 2019 GT&S case, the Commission
20 approved PG&E allocating 250 MMcf per a day, or storage
21 withdrawal capacity, designated as reserve capacity to
22 meet supply when PG&E experiences a major system outage
23 on a peak day?

24 A They did do that. But they also, on page 40,
25 said:

1 Thus, for the next rate case, we direct
2 PG&E to offer a proposal for improving its
3 curtailment process, and to state whether and
4 to what extent using an hourly curtailment
5 would allow it to offset some of the inventory
6 volumes that are allotted for reserve capacity.

7 So even in that initial decision, the
8 Commission was interested in further exploring
9 curtailment as an alternative to reserve capacity.

10 Q But they didn't actually make a determination;
11 is that correct?

12 A No. They -- they kicked it over to the next
13 case where -- you know, I -- your Exhibit 31, I assume
14 we'll turn to that.

15 Q Right. And do you -- I -- I wasn't going to
16 refer to that, but were you going to --

17 A It's page 161 of the excerpt in PG&E-31. The
18 top of the page, the Commission -- you know, it says it
19 lacks sufficient evidence in this proceeding to
20 continue -- consider modifying PG&E's curtailment
21 process as a substitute for reserve capacity, but once
22 again directs PG&E to address this issue in a new
23 application.

24 Q Correct.

25 Mr. Florio, do you agree that reserve capacity

1 provides additional gas supply to the system?

2 A It can. Yes.

3 Q But by withdrawing gas from the reservoir,
4 under certain conditions, it brings new gas into the
5 system?

6 A Yes.

7 Q And would you agree that curtailment does not
8 provide new supply of gas; it simply cuts gas service
9 and therefore forces a reduction in gas demand?

10 A Yes. But some of those very parties who would
11 suffer that curtailment have agreed with me that it's
12 not worth the cost to -- to keep this.

13 Q Sorry. What are you referring to? Is this
14 testimony in this case?

15 A I'm referring to the testimony of the Indicated
16 Shippers and the Southern California Generation
17 Coalition. And they represent some of the parties who
18 would be the first curtailed under -- under this system.
19 And they also support eliminating reserve capacity.

20 Q So your testimony, just to be clear, is to
21 eliminate reserve capacity and replace it with
22 curtailment instead --

23 A Yes.

24 Q -- in other words, instead of supplying gas
25 when supply disruptions occur, you would have PG&E gas

1 service instead?

2 A Under those rare circumstances where you have a
3 confluence of extremely cold weather and mechanical
4 failures, and -- there would still be a cushion, even
5 above -- even if you didn't call it reserve capacity,
6 under my projections, there would still be a cushion
7 there. And only if that cushion was used up, would you
8 have to curtail. And, you know, my assessment is -- you
9 know, we're already looking at
10 one-worst-day-in-ten-years scenario. And then, having
11 that outage that would affect your ability as some other
12 probability, we're looking at something much less than 1
13 in 10, it's 1 in 20, or 1 in 40, or 1 in 50 that -- that
14 this would occur. So, you know, I think -- you know,
15 it's a question of how much insurance is it worth
16 buying? And I think your customers are telling you, "We
17 don't need that much insurance. We'll take that risk
18 rather than pay, you know, \$100 million over this rate
19 case cycle for more wells."

20 Q On your last point, Southern California
21 Generation Coalition, would those be PG&E's customers?

22 A I believe some of their members are PG&E
23 customers. I don't know why they would be in your case
24 if they weren't.

25 Q Well, that's a very good question. I'm not

1 sure the answer is so obvious.

2 And I also -- I just want to also return to:
3 If there is a supply shortage and there's not enough gas
4 to serve all load, then isn't it fair to say that
5 reserve capacity would allow some supply of gas up to
6 the 250, after which curtailment would have to be used?

7 A Mathematically, that follows. Yes.

8 Q Okay. So, just returning to the Commission's
9 reliability standard definition that we looked at
10 earlier, it requires PG&E to meet load requirements on a
11 peak demand day when PG&E experiences a high customer
12 demand for gas.

13 Do you agree that curtailing customers when an
14 outage occurs in those conditions would not be -- would
15 not be meeting load requirements?

16 A Well, it depends on your definition. Because,
17 you know, an electric generator on the PG&E system might
18 be curtailed; but that generation could be sourced from
19 somewhere else. So, you know, you're not really talking
20 about end use -- I mean, a power plant is a PG&E
21 customer. And you would be curtailing them; but you
22 wouldn't be curtailing, you know, the electric customers
23 that -- that depend on them, because there are other
24 alternatives.

25 Q But the peak day supply standard includes

1 service to industrial and generation loads; right?

2 That's the plan, to meet the demand --

3 A It does, to a one-day-in-ten-years standard.

4 Q Right.

5 If reserve capacity is eliminated, would you
6 agree that that definition of the reliability standard
7 that we read would have to be revised?

8 If PG&E would no longer be held to meeting all
9 demand under those conditions; if a supply disruption
10 occurred, the term "meeting demand" would have to be
11 revised?

12 A I think it's a matter of interpretation. You
13 know, I don't think you would actually have to modify a
14 decision. I mean, the Commission has raised this twice
15 now in decisions saying, "We want you to look at whether
16 curtailment can replace some or all of this reserve
17 capacity." So, clearly, it's something the Commission
18 has been thinking about for the last seven years now.

19 Q Well, I think it's -- isn't it fair to say
20 their discussion of that is a response to proposals by
21 intervenors that curtailment be -- be used instead, and
22 the Commission keeps saying, "We need the first
23 understand, have more information about" --

24 A Yes. But they have never dismissed it out of
25 hand. They have said, "We want to see a new curtailment

1 system," and it's the same system that has worked in
2 Southern California with periodic curtailment of the
3 large electric generators. And, you know, it has not
4 caused a reliability crisis on the electric side.
5 There's always been, you know, alternative sources of
6 electric supply that can make up for that curtailed gas
7 generation.]

8 MR. OUBORG: I see the court reporter. I have
9 one more question, which will take a few minutes, and
10 then I'll be done.

11 Is that acceptable, your Honor?

12 ALJ GRUEN: Yes. Please proceed, Mr. Ouborg.

13 BY MR. OUBORG:

14 Q Did TURN support the NGSS adopted in the 2019
15 GT&S case?

16 A We supported the Memorandum of Understanding
17 that was negotiated between TURN, PG&E, and the
18 independent storage providers. We didn't love every
19 aspect of it, but on balance we thought it was a good
20 change to the system. And once we signed on, we
21 vigorously advocated for its adoption by the Commission.

22 Q And was reserve capacity one of the parts or
23 elements of the NGSS?

24 A Yes, it was.

25 Q So can --

1 A So was the -- so was the retirement of
2 Los Medanos. PG&E turned a corner on that pretty
3 quickly.

4 Q Thank you, Mr. Florio. Could you turn to
5 what's being identified as PG&E Exhibit 37 or maybe it's
6 best stated Exhibit PG&E-37. Let me know when you're
7 there.

8 A Yes.

9 Q This is an excerpt from your brief in the 2019
10 GT&S case. Can you go to the very last page, which I
11 believe is page 152 of your brief.

12 A I see that.

13 Q I've highlighted two statements. The first
14 says -- this is TURN speaking:

15 The NGSS is a balanced package of
16 provisions that will meet the system's
17 operational needs at the lowest possible cost
18 given the requirements of the new regulations.

19 And then further down, you issue a warning to
20 the Commission saying:

21 This Commission must be cautious about
22 cherry picking particular elements of the
23 package because the resulting system must be
24 able to work as a coherent whole to provide the
25 level of service that customers have come to

1 expect.

2 So in 2019 TURN agreed that reserve capacity
3 was a critical element of a package of services designed
4 to provide, quote, "the level of service that customers
5 have come to expect."

6 What has happened since then that TURN now
7 thinks curtailing customers, instead of supplying them
8 with gas, is consistent with the level of service that
9 customers have come to expect?

10 A Well, several things. I mean, first of all, as
11 I said before, we were advocating for a package of
12 provisions that we had agreed to and agreed to
13 strenuously advocate before the Commission.

14 Because it was a memorandum of understanding
15 and not an all-party settlement, one is necessarily
16 concerned about the Commission picking and choosing
17 elements of the package. As a signatory to the MOU, we
18 did not want to see that happen. As I said, not every
19 provision was something that we thought was wonderful,
20 but we thought that the package as a whole at that time
21 was reasonable.

22 In the eight years since then, there has been
23 increasing concern about the cost of utility service,
24 and reserve capacity is something that contributes to
25 that. And seeing the very customers who would be

1 curtailed also expressing the same view that this is a
2 necessary insurance, you know, convinced me that, you
3 know -- I'm not the first one to say something in the
4 NGSS should be changed. PG&E did that when it went back
5 on its proposal to close Los Medanos. So I'm hardly the
6 first one to say in the eight years since, we've learned
7 some things that require a change.

8 Q Thank you, Mr. Florio.

9 Your Honor, that concludes my questions for
10 Mr. Florio. I don't know when you would want to go over
11 the exhibits that I covered, and some of them should be
12 entered in the record or we would propose they be
13 entered in the record and the others were just for
14 reference.

15 ALJ GRUEN: Yes. Thank you, Mr. Ouborg.
16 Before we handle exhibits, let me turn to Ms. Goodson
17 and ask if TURN has any redirect. And then after the
18 questions play out, we can turn to exhibits. Thank you
19 for that.

20 Ms. Goodson, any redirect from TURN?

21 MS. GOODSON: Just a very brief question that
22 might turn into two questions, your Honor.

23 REDIRECT EXAMINATION

24 BY MS. GOODSON:

25 Q Mr. Florio, do you believe that Mr. Ouborg

1 asked you about the GT&S decision, and particularly the
2 discussion of reserve capacity?

3 A Yes.

4 Q And do you recall that he asked you to confirm
5 that the Commission in that GT&S decision did not order
6 that curtailment be used as a replacement for reserve
7 capacity, but, rather, the Commission instructed that it
8 be considered in the future?

9 Do you remember that?

10 A Yes, yes.

11 Q And Mr. Ouborg also asked you about the
12 inclusion of reserve capacity in the 2019 GT&S
13 Memorandum of Understanding.

14 Do you recall that?

15 A Yes, yes.

16 Q And at the time that TURN entered into the MOU
17 and at the time that the Commission issued the GT&S
18 decision, what was PG&E's curtailment process like?

19 A It was pro rata curtailment of all noncore
20 customers on the system of which there are several
21 hundred, many of whom are not staffed 24 hours. That
22 was widely regarded as an unworkable system that, you
23 know, you could not quickly disconnect enough
24 customer -- and the customers would curtail themselves,
25 so PG&E might not even know if a given customer had

1 curtailed.

2 A lot has changed since then. Under the new
3 curtailment protocol that the Commission has adopted,
4 you know, electric generators are curtailed first. That
5 is done by working with the ISO, though the ISO would
6 not dispatch those plants. So you're not, as in the old
7 system, hoping a customer responds to a curtailment call
8 from the utility. You're actually having the system
9 operator build that curtailment into their dispatch of
10 the system.

11 So it happens almost automatically, and you
12 don't have the concern that was existing back then that
13 you could tell customers to curtail, and they just
14 don't. And then you're in a world of hurt. So it's
15 dramatically different from what the case was back in
16 2019.

17 Q Thank you, Mr. Florio.

18 Your Honor, I have no further redirect.

19 ALJ GRUEN: Okay. Thank you, Ms. Goodson.

20 Mr. Ouborg, any recross that you'd like to do?

21 MR. OUBORG: Yes, your Honor. Thank you.

22 RECCROSS-EXAMINATION

23 BY MR. OUBORG:

24 Q Mr. Florio, could you quickly refer again to
25 Exhibit PG&E-31 which is from the '23 GRC decision and

1 turn to page 160. Let me know when you're there.

2 A I have it.

3 Q You see the highlighted section. This is the
4 Commission explaining PG&E's reserve capacity service.
5 The Commission expressly states that when PG&E runs out
6 of reserve capacity in a supply shortage, then PG&E has
7 a process for curtailing service to certain noncore
8 customers. So the Commission has recognized that when
9 we run out of supply options, we did have that process;
10 isn't that correct?

11 A Yes. But on the very next page, they say they
12 lack sufficient evidence in this proceeding to consider
13 modifying PG&E's curtailment process as a substitute for
14 reserve capacity and once again orders -- directs PG&E
15 to address this issue. So clearly it was on the
16 Commission's mind four years ago when they were dealing
17 with this, and we finally, after two or three attempts
18 at it, have a workable curtailment system in place.

19 Q Isn't it true, Mr. Florio, that although PG&E's
20 new curtailment process has been adopted, it has not
21 been implemented yet?

22 A Well, the implementation procedures have been
23 established and, you know, as far as the California ISO
24 is concerned -- and they're a critical partner in
25 this -- they've already been doing something similar

1 with SoCalGas in Southern California. They know how to
2 do this, so it's not new to them. It has worked in
3 Southern California.

4 We have had numerous curtailments over the
5 years around the problems with Aliso Canyon, and people
6 aren't happy about it. But at the same time, we have
7 SCGC saying here we'd rather have that system than pay
8 for reserve capacity.

9 MR. OUBORG: I have no further questions, your
10 Honor.

11 ALJ GRUEN: Okay. Thank you, Mr. Ouborg.

12 Ms. Goodson, any further questions from TURN?

13 MS. GOODSON: Hopefully just a quick clarifying
14 question.

15 REDIRECT EXAMINATION

16 BY MS. GOODSON:

17 Q Mr. Florio, Mr. Ouborg directed you to page 160
18 of the PG&E 2023 GRC decision.

19 Do you recall that?

20 A Yes.

21 Q And he specifically pointed you to the
22 statement that PG&E has a process for curtailing service
23 to certain noncore customers.

24 Do you recall that?

25 A Yes.

1 Q And the process that PG&E had at the time the
2 Commission adopted this decision, was that process akin
3 to PG&E's curtailment process during the GT&S time
4 period or was that process akin to the much more
5 automated curtailment process that you described during
6 our previous --

7 A It was the old pro rata system that I described
8 earlier.

9 Q Thank you, Mr. Florio.

10 No further redirect, your Honor.

11 ALJ GRUEN: Thank you, Ms. Goodson.

12 Mr. Ouborg, anything further from PG&E? Any
13 further questions?

14 MR. OUBORG: No, your Honor.

15 ALJ GRUEN: Very good. With that, I don't have
16 any questions.

17 Mr. Matthews, I see you present. Do you -- oh,
18 okay. I see your video just went off.

19 In that case, Mr. Ouborg, would you like to
20 make a motion for any exhibits to go into the record?

21 MR. OUBORG: Yes, your Honor, I would. PG&E
22 moves to admit what have been identified as Exhibit
23 PG&E-34, PG&E-35, PG&E-37, PG&E-39, PG&E-40, PG&E-41,
24 and PG&E-45.

25 ALJ GRUEN: Very good. Understood.

1 Are there any objections?

2 MS. GOODSON: No, your Honor. One question. I
3 believe the exhibits that were excluded from PG&E's
4 motion are the ones that are excerpts from Commission
5 decisions; is that correct?

6 ALJ GRUEN: Mr. Ouborg, can you clarify?

7 MR. OUBORG: Or they're a copy of a page from
8 PG&E's testimony in the case of Table 7.5, and then --
9 those are the categories that we did not move to admit.

10 MS. GOODSON: Thank you. That's perfectly
11 acceptable to TURN. I was trying to follow in realtime
12 and just wanted to make sure I didn't miss something.

13 ALJ GRUEN: Okay. Ms. Berman, I see you have
14 appeared. Do you have anything on point with regards to
15 PG&E's motion or is this another matter?

16 MS. BERMAN: Another matter, your Honor. Thank
17 you.

18 ALJ GRUEN: Okay. I see that all of the
19 exhibits, Mr. Ouborg, that you noted are shown in the
20 latest exhibit list so that's helpful. With that, the
21 exhibits that PG&E just requested to enter into the
22 record are admitted.

23 MR. OUBORG: Thank you, your Honor.

24 ALJ GRUEN: Thank you.

25 ///

1 (Exhibits PG&E Ex-34, PG&E Ex-35 were
2 received into evidence.)

3 (Exhibit PG&E Ex-37 was received into
4 evidence.)

5 (Exhibits PG&E Ex-39, PG&E Ex-40, PG&E Ex-41
6 were received into evidence.)

7 (Exhibit PG&E Ex-45 was received into
8 evidence.)

9 ALJ GRUEN: Ms. Goodson, I see your hand.

10 MS. GOODSON: Yes, your Honor, I was hoping to
11 move into the record the exhibits that Mr. Florio is
12 sponsoring, and I will identify them again for you.
13 Those are exhibits TURN Exhibit 6; TURN Exhibit 6-C, as
14 in confidential; TURN Exhibit 6, Attachment 1;
15 TURN Exhibit 6 Workpapers; and finally, TURN Exhibit 6-C
16 Workpapers.

17 ALJ GRUEN: Great. And you beat me to it.
18 Ms. Goodson, can you clarify, are all of those shown in
19 the exhibit list?

20 MS. GOODSON: Your Honor, all of them are shown
21 in the exhibit list with the exception of the two that
22 are confidential. Those are the ones that, you know,
23 were served -- provided to PG&E, and your Honors timely.
24 They just have not yet made it into PG&E's electronic
25 exhibit list, but they are aware of this, and they will

1 be included this evening when that exhibit list is
2 updated.

3 As you can see, that exhibit list does contain
4 confidential exhibits submitted by other parties that
5 are -- it's kind of a special highlighting row. There's
6 no link to supporting documents obviously, so they're
7 being treated a little bit differently.

8 ALJ GRUEN: Okay. Thank you.

9 Mr. Ouborg, any concerns if Ms. Goodson
10 identifies the titles of the confidentially marked
11 exhibits for the record before we ask the question about
12 moving in?

13 MR. OUBORG: No, your Honor.

14 ALJ GRUEN: Okay. In that case, just since
15 they're not yet on the exhibit list, Ms. Goodson, would
16 you kindly state the titles of the confidentially marked
17 exhibits that you just identified.

18 MS. GOODSON: Yes, of course, your Honor. TURN
19 Exhibit 6-C is the Prepared Testimony of Michael Peter
20 Florio and Jalal Awan Addressing Gas Storage Capital and
21 Expenses and the Gas Peak Day Supply Standard. It is a
22 confidential document.

23 ALJ GRUEN: Great. Did you identify another
24 confidential exhibit as well?

25 MS. GOODSON: Yes, your Honor. That is TURN

1 Exhibit 6-C Workpapers. These are the workpapers
2 supporting TURN Exhibit 6-C.

3 ALJ GRUEN: Thank you.

4 With that, Mr. Ouborg, any objections to any of
5 the exhibits that TURN has requested to be entered into
6 the record?

7 MR. OUBORG: No, your Honor.

8 ALJ GRUEN: All right. Then with that, the
9 exhibits that TURN has requested to be entered into the
10 record are admitted.

11 MS. GOODSON: Thank you, your Honor.

12 ALJ GRUEN: Thank you.

13 (Exhibit TURN Ex-06 was received into
14 evidence.)

15 (Exhibit TURN Ex-06-C was received into
16 evidence.)

17 (Exhibit TURN Ex-06-Atch1 was received into
18 evidence.)

19 (Exhibit TURN Ex-06 Workpapers was received
20 into evidence.)

21 (Exhibit TURN Ex-06-C Workpapers was received
22 into evidence.)

23 ALJ GRUEN: Anything further before we excuse
24 Mr. Florio? Anything further from PG&E or TURN on this
25 matter?

1 MR. OUBORG: No, your Honor.

2 ALJ GRUEN: Thank you.

3 Ms. Goodson?

4 MS. GOODSON: Nothing further, your Honor.

5 ALJ GRUEN: All right. Thank you.

6 With that, Mr. Florio, thank you for your
7 testimony. You're excused.

8 THE WITNESS: Thank you, your Honor.

9 ALJ GRUEN: All right. I'm thinking that
10 because NRDC has appeared, NRDC may have a matter to
11 raise.

12 Ms. Berman, let's turn to you, please.

13 MS. BERMAN: Thank you, your Honor. We
14 discussed this morning moving exhibits into the record
15 at the end of the day, so if now is the time, I will go
16 ahead.

17 ALJ GRUEN: Yes, please go ahead.

18 MS. BERMAN: Thank you very much. NRDC's
19 witnesses who were originally scheduled for cross are no
20 longer scheduled for cross because they've stipulated.
21 We would just like to make sure that NRDC-01 and
22 NRDC-03, which is the testimony of those witnesses that
23 were scheduled for cross, get moved into the record.

24 ALJ GRUEN: All right. Very good. I am
25 checking. I see it looks like NRDC Exhibit 01 and NRDC

1 Exhibit 03 are both on the exhibit list; is that
2 correct?

3 MS. BERMAN: That's correct. Thank you.

4 ALJ GRUEN: All right. Mr. Matthews, does PG&E
5 have any objection to the admission of the two exhibits
6 or either of the exhibits that NRDC identified into the
7 record?

8 MR. MATTHEWS: No objection, your Honor.

9 ALJ GRUEN: All right. Then with that, the
10 exhibits that NRDC just requested, Exhibit NRDC-01 and
11 Exhibit NRDC-03 are both admitted.

12 MS. BERMAN: Thank you, your Honor.

13 ALJ GRUEN: Thank you. Anything further,
14 Ms. Berman?

15 MS. BERMAN: No, thank you.

16 ALJ GRUEN: Okay. Thank you, Ms. Berman.

17 (Exhibit NRDC Ex-01 was received into
18 evidence.)

19 (Exhibit NRDC Ex-03 was received into
20 evidence.)

21 ALJ GRUEN: Mr. Matthews, I see your hand.

22 MR. MATTHEWS: Your Honor, if there's time,
23 PG&E would like to request that PG&E Exhibit 4 Testimony
24 and PG&E Exhibit 4 Workpapers be entered into the
25 record.

1 ALJ GRUEN: Yes. Bear with me a moment. I see
2 that clarification question -- I'm just exploring the
3 exhibit list. It looks like for completeness, PG&E
4 Exhibit 4 Testimony has two volumes I see, and then PG&E
5 Exhibit 4 Workpapers, I see, looks like has three
6 volumes, and then Exhibit 4A Testimony References; is
7 that correct?

8 MR. MATTHEWS: That is correct, your Honor.

9 ALJ GRUEN: For clarification, are you moving
10 for all of those exhibits to be entered into the record?

11 MR. MATTHEWS: If it's easier to deal with it
12 that way, your Honor, yes. I was going to do 4A
13 separately, but --

14 ALJ GRUEN: Oh.

15 MR. MATTHEWS: -- if we want to do it all
16 together. 4A needs to be identified, I would add.

17 ALJ GRUEN: I see. Well, let's do 4A
18 separately then as you mentioned. I see your point.

19 Do any parties have any objections to the entry
20 of exhibits PG&E Exhibit 4 Testimony or PG&E Exhibit 4
21 Workpapers as we just discussed?

22 (No response.)

23 ALJ GRUEN: All right. I'm seeing no
24 objections. With that, PG&E Exhibit 4 Testimony and
25 PG&E Exhibit 4 Workpapers, all volumes associated with

1 those exhibits, are admitted into the record.

2 (Exhibit PG&E Ex-04 Testimony was received
3 into evidence.)

4 (Exhibit PG&E Ex-04 Workpapers was received
5 into evidence.)

6 ALJ GRUEN: Mr. Matthews, do you want to turn
7 to the next item?

8 MR. MATTHEWS: Yes. PG&E requests for marking
9 and identification PG&E Exhibit 04A Testimony
10 References.

11 ALJ GRUEN: Yes.

12 MR. MATTHEWS: This is the 2023 and 2024 System
13 Hardening Accountability Reports that are referenced in
14 PG&E-04, Chapter 7, Section D.2.B.

15 ALJ GRUEN: Yes. PG&E Exhibit 04A Testimony
16 References as just identified are so marked.

17 (Exhibit PG&E Ex-04A Testimony References was
18 marked for identification.)

19 ALJ GRUEN: Mr. Matthews?

20 MR. MATTHEWS: Yes, thank you, your Honor.
21 PG&E requests that PG&E Exhibit 04A Testimony References
22 be admitted into the record.

23 ALJ GRUEN: All right. Are there any
24 objections to PG&E Exhibit 04A Testimony References
25 being admitted into the record?

1 (No response.)

2 ALJ GRUEN: Seeing none, PG&E's Exhibit 04A

3 Testimony References are admitted.

4 (Exhibit PG&E Ex-04A Testimony References was
5 received into evidence.)

6 ALJ GRUEN: Mr. Matthews, anything else?

7 MR. MATTHEWS: Yes. Your Honor, PG&E requests
8 that PG&E Exhibit 06 Testimony and PG&E Exhibit 06
9 Workpapers be entered into the evidentiary record.

10 ALJ GRUEN: Okay. Are there any objections to
11 PG&E's request?

12 (No response.)

13 ALJ GRUEN: Hearing none, PG&E Exhibit 06
14 Testimony and PG&E Exhibit 06 Workpapers are both
15 admitted.

16 (Exhibit PG&E Ex-06 Testimony was received
17 into evidence.)

18 (Exhibit PG&E Ex-06 Workpapers was received
19 into evidence.)

20 ALJ GRUEN: Mr. Matthews?

21 MR. MATTHEWS: Finally, your Honor -- and I am
22 aware of the time -- PG&E requests that PG&E
23 Exhibit 06-C Workpapers be entered into the evidentiary
24 record.

25 ALJ GRUEN: All right. Are there any

1 objections to PG&E Exhibit 06-C Workpapers being
2 admitted into the record?

3 (No response.)

4 ALJ GRUEN: Hearing none, PG&E Exhibit 06-C
5 Workpapers are admitted.

6 (Exhibit PG&E Ex-06-C Workpapers was received
7 into evidence.)

8 MR. MATTHEWS: Your Honor, I am mindful of
9 time, so we can do additional housekeeping tomorrow and
10 Thursday and Friday.

11 ALJ GRUEN: Okay. Very good.

12 With that, thank you, Mr. Matthews. I
13 appreciate your conscientiousness.

14 With that, we are adjourned for the day. Let's
15 go off the record.

16 (At the hour of 5:00 p.m., this matter having
17 been continued to May 13, 2026, at 9:30 a.m.,
18 the Commission then adjourned.)

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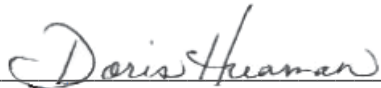
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