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08/13/26
03:55 PM
A2505009

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

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. (U 39 M)	A.25-05-009

NOTICE OF EX PARTE COMMUNICATION

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On behalf of
CALIFORNIA COMMUNITY CHOICE ASSOCIATION

Dated: August 13, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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. (U 39 M)	A.25-05-009

NOTICE OF EX PARTE COMMUNICATION

Pursuant to Rule 8.4 of the Rules of Practice and Procedure of the California Public Utilities Commission, the California Community Choice Association[1] (CalCCA) hereby provides notice of the following *ex parte* meeting related to the above referenced proceeding.

Manisha Lakhanpal, Advisor to Commissioner Baker, Kyle Navis, Senior Advisor to Commissioner Baker, Justin Galle, Advisor to President Reynolds, and Seina Soufiani, Advisor to President Reynolds met with CalCCA on August 13, 2026, from 1:30 p.m. to 2:00 p.m. via video conference.

CalCCA's participants in this meeting included: Julia Kantor, Partner, Keyes & Fox LLP; Gonzalo Rodriguez, Associate, Keyes & Fox LLP; Ryan Matley, Principal, NewGen Strategies & Solutions; Leanne Bober, Director of Regulatory Affairs and Deputy General Counsel, CalCCA; and Willie Calvin, Senior Regulatory Case Manager, CalCCA.

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[1] California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance of Southern California, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, Valley Clean Energy, and WestLight Energy.

During this meeting, CalCCA discussed its arguments made in briefing in this proceeding. Attachment A hereto is the presentation that was utilized during the meeting and emailed to decisionmakers before meeting.

Respectfully submitted,

/s/ Julia Kantor
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On behalf of
CALIFORNIA COMMUNITY CHOICE ASSOCIATION

August 13, 2026

ATTACHMENT A

California Community Choice Association’s Issues in PG&E’s Phase I GRC

August 13, 2026

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CalCCA's Primary Proposals Would Save Ratepayers Over $10 Million Annually & Prevent a Cost Shift of Over $100 Million

Issue	CalCCA Proposal	Cost Impact
Re-Vintaging Assets for which PG&E is Pursuing FERC Relicensing and Substantial Associated Investments	The Commission should re-vintage eight hydroelectric (hydro) facilities to the 2027 vintage for purposes of Power Charge Indifference Adjustment (PCIA) cost recovery.	No revenue requirement impact; proposal would prevent a cost shift of ~$110 to $147 million
Cost Recovery for Hydro Assets No Longer Used and Useful	The Commission should remove 13 hydro assets that erroneously remain on PG&E's books from the Electric Generation revenue requirement.	$10.6 to $12.1 million annually

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CalCCA Also Recommends Additional Cost Reductions, Refunds, & Cost Allocation Fixes Benefitting All Ratepayers

Issue	CalCCA Proposal	Cost Impact
Revenue Requirement Reductions	1. Reduce depreciation expense for hydro facilities by ~$9 million annually. 2. Remove the Deferred Tax Asset (DTA) associated with Diablo Canyon Power Plant (DCPP). 3. Reduce PG&E's Production Operations and Maintenance (O&M) forecast by $34.8 million annually because (1) PG&E has not justified its proposed substantial increase in hydro operators; and (2) PG&E has not forecasted any offsetting savings from its increased asset and risk management investments.	1. $9.2 million annually 2. $4.3 million annually 3. $34.8 million annually
Cost Allocation Proposals	1. Reclassify assets according to FERC Order 898. 2. Reject PG&E's request to make a one-off change in allocation for hydro license electric intangible assets. 3. Require PG&E to begin tracking plant, accumulated depreciation, depreciation expense, and Accumulated Deferred Income Tax at the hydro facility level.	1. $18.8 million reduction in 2027 Electric Generation RRQ 2. $36 million reduction in 2027 Electric Generation RRQ 3. Allows for greater precision in cost allocation going forward
Capping and Refunding of CCA Service Fee Overcollections	Require PG&E to cap its revenues associated with CCA/DA billing services at the cost included in its forecast for such services and refund any revenue received above that cap to CCA/DA customers.	$2.5 million annually (cap going forward); $10.3 million historical overcollection (2020–2024)
Limiting Balancing Account Treatment	Limit the use of the Hydro Licensing Balancing Account (HLBA) to costs that are truly unpredictable, variable, and generally outside of the utility's control.	Reclassifies ~$1 billion in 2027–2030 forecast capital from guaranteed balancing-account recovery to ordinary base-rate treatment

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The Commission Should Re-Vintage Eight Hydro Assets for Purposes of PCIA Cost Recovery

- **Core problem**
  - PG&E proposes unbundled customers bear the financial burden of investment decisions PG&E is making today, on behalf of its current bundled customers, to extend the operational lifespans of these assets.
  - If the Commission does not act in this proceeding, it will be sanctioning a cost shift of **~$110-$147 million**.

- **CalCCA proposal**: The Commission should order PG&E to move these eight hydro facilities from the Legacy UOG vintage to the 2027 vintage for purposes of PCIA cost recovery.

- **Context: growing Commission recognition of the need to reconsider asset vintage assignments**
  - Re-vintaging triggered by PPA extensions and amendments
  - Re-vintaging triggered by reinvestments in utility-owned generation (UOG)

- **GRC versus PCIA OIR scope on vintaging issues**
  - GRC scope: determination regarding cost allocation for the over $1.6 billion investment PG&E is proposing in these assets in this case.
  - PCIA OIR scope: determination regarding the going-forward policy framework for re-vintaging of UOG assets across the three IOUs' service territories.

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The Commission Should Reconsider an Asset's Vintage Assignment in Cases of Substantial Reinvestment

Reconsideration of a UOG vintage assignment is to be reviewed on a **case-by-case basis**, based on a **fact-specific analysis** of whether the investment causes one of the following **triggering events** to occur:*

- An **extension** in the asset's useful life;
- A **capacity expansion** of the asset;
- A **change in the function** of the asset; and/or
- A large investment in the asset that leads to a "**significant overhaul**" of the facility.

* *See* D.23-11-069, at 511; D.18-10-019, at 135.

In D.23-11-069, the Commission found:

1. For the 12 assets at issue in that case, there was insufficient record evidence to order re-vintaging.
2. Going forward, PG&E must provide more robust testimony on re-vintaging issues when it proposes **certain types of investments in UOG**.

Eight Hydro Assets in this Case Implicate Several Triggers

Hydro Assets Implicating Re-Vintaging Triggers			
Hydro Asset	**Relicensing Life Extension?**	**Changing Function?**	**2025–2030 Investment***
Phoenix	Yes, 2022 -> 2064	Yes	$21.5 million; 37% of original cost
DeSabla-Centerville	Yes, 2022 -> 2038	Yes	$52.4 million; 21% of original cost
Helms	Yes, 2069 -> 2079	Yes	$948.4 million; 35% of original cost
Balch	Yes, 2069 -> 2079	Yes	$97.5 million; 34% of original cost
Drum-Spaulding	Yes, 2063 -> 2077	Yes	$453.6 million; 37% of original cost
Kerckhoff 2	Yes, 2065 -> 2076	Yes	$96.7 million; 19% of original cost
McCloud-Pit	Yes, 2061 -> 2075	Yes	$648.1 million; 54% of original cost
Upper North Fork Feather River	Yes, 2061 -> 2075	Yes	$294.4 million; 18% of original cost

*Note the percent of original cost has been adjusted for inflation over the life of the hydro asset.

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Asset Life Extension Constitutes a New Cost Obligation on Behalf of Bundled Customers

FERC License Expiration and Relicensing

- ✓ For each of the hydro assets at issue, PG&E made the **affirmative decision** to seek an extension of the asset lifespan with FERC.
- ✓ FERC relicensing is the **regulatory signoff that allows PG&E to continue operation** of the facility—often for another 40 to 50 years—and **without which PG&E would need to immediately cease operation of the asset**.
- ✓ PG&E had **other options it could exercise at this decision point** (*e.g.*, selling or retiring these assets).
- ✓ PG&E is taking on a **significant financial investment** to prepare these facilities for additional decades of service.
- ✓ PG&E is **committing to comply with any new licensing requirements** that FERC might impose.

Asset Life Extensions in Depreciation Study

- ✓ PG&E's depreciation study end-of-life dates represent the **probable retirement dates** for each asset, as estimated by **PG&E's own experts** based on **their best professional judgment.**
- ✓ PG&E's proposed **depreciation study extends the end-of-life date** for each of the hydro assets **between 10 and 42 years**, generally **in line with** the asset's **new anticipated license term**.
- ✓ PG&E relies on its best estimates—however imperfect—to set rates. These estimates are **used for purposes of establishing depreciation rates**; there is no reason they should not be used for PCIA ratemaking purposes as well.

Full Depreciation of Original Cost of the Asset

- ✓ The **original term** of an asset's FERC license is the **primary factor** PG&E uses to determine the **end-of-life date** for the asset at the time of initial investment for purposes of its depreciation study.
- ✓ Therefore, relicensing of an asset generally occurs at the point at which **PG&E has achieved full depreciation of the asset**.
- ✓ If an asset has achieved full depreciation, this means PG&E **has recovered its original investment in the asset**—*i.e.*, its original generation commitment.
- ✓ Any **further significant investment** in the asset (*i.e.*, to support relicensing for an extended asset lifespan) represents a new investment **distinct from PG&E's original commitment**.

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PG&E is Making These Investments on Behalf of Current Bundled Load

- ✓ PG&E **cannot make generation commitments on behalf of unbundled** customers unless it is *specifically ordered to do so*.
- ✓ PG&E effectively conceded that the **two largest benefits** associated with these assets are their **two largest monetary value streams**: energy and capacity value.
- ✓ The **analysis PG&E conducts to inform its decisions** around whether to sell, retire, or reinvest shows that the **primary drivers** of PG&E's decision are the **quantifiable costs and benefits** of each pathway.
- ✓ PG&E's witness conceded that **PG&E's bundled load was a driving factor** in PG&E's decision-making around whether to sell, retire, or reinvest.
- ✓ In the majority of RA compliance periods over the last five years, **PG&E has used these assets to fulfill its RA requirements** for its bundled customers.

NPV Analysis of Alternative Paths

Values are in 2018$, 000s	Past Costs (based on 12/31/17 balances)						Future Costs (30-yr NPV)			Forgone Energy Values (30-yr NPV)				
Options	NBV (Direct + Allocated)	CWIP (Direct + Allocated Relicensing)	Sales Proceeds (Price-trans. costs)	Unrecovered costs for recovery	Cost recovery assumptions	RR of past costs (30 year NPV)	Future O&M Expense	RR of future CAPX	RR associated with total future costs	Energy	RECs	Capacity	Total	TOTAL COST TO CUSTOMERS
	(A)	(B)	(C)	(D) = (A)+(B)-(C)	(E)	(F) = cost recovery of (D) based on (E)	(G)	(H) = cost recovery of future CAPX based on (E)	(I) = (G)+(H)	(J)	(K1)	(K2)	(L) = (J)+(K1)+(K2)	(M) = (F)+(I)+(L)
1. Continue to Own and Operate the Asset	$ 30,719	$ 1,584	$ -	$ 32,303	Standard 50-Year Revenue Recovery	$ 37,278	$ 15,710	$ 14,620	$ 30,330	$ -	$ -	$ -	$ -	$ 67,607
2. Sell the Asset and Transfer in 2019	$ 30,719	$ 1,584	$ (50)	$ 32,353	Accelerated 1-Year Revenue Recovery	$ 31,746	$ 1,557	$ 45	1,602	$ 9,889	$ 2,863	$ 2,605	15,357	$ 48,705
3. Surrender License and Decommission in 2024	$ 30,719	$ 1,584	$ -	$ 32,303	1-Year Revenue Recovery in 2024	$ 34,831	$ 14,212	$ 3,438	17,650	$ 7,494	2,108	1,824	11,426	$ 63,906

PG&E recovers capital costs through a standard revenue requirement model which includes return on capital, book depreciation, income taxes, property taxes, O&M and insurance. We sum up these components for each year of the revenue requirements schedule and then calculate the Net Present Value (NPV) based on our authorized after-tax cost of capital of 7%. We don't include franchise fee and uncollectibles in this revenue requirement model.

See CalCCA Ex-6

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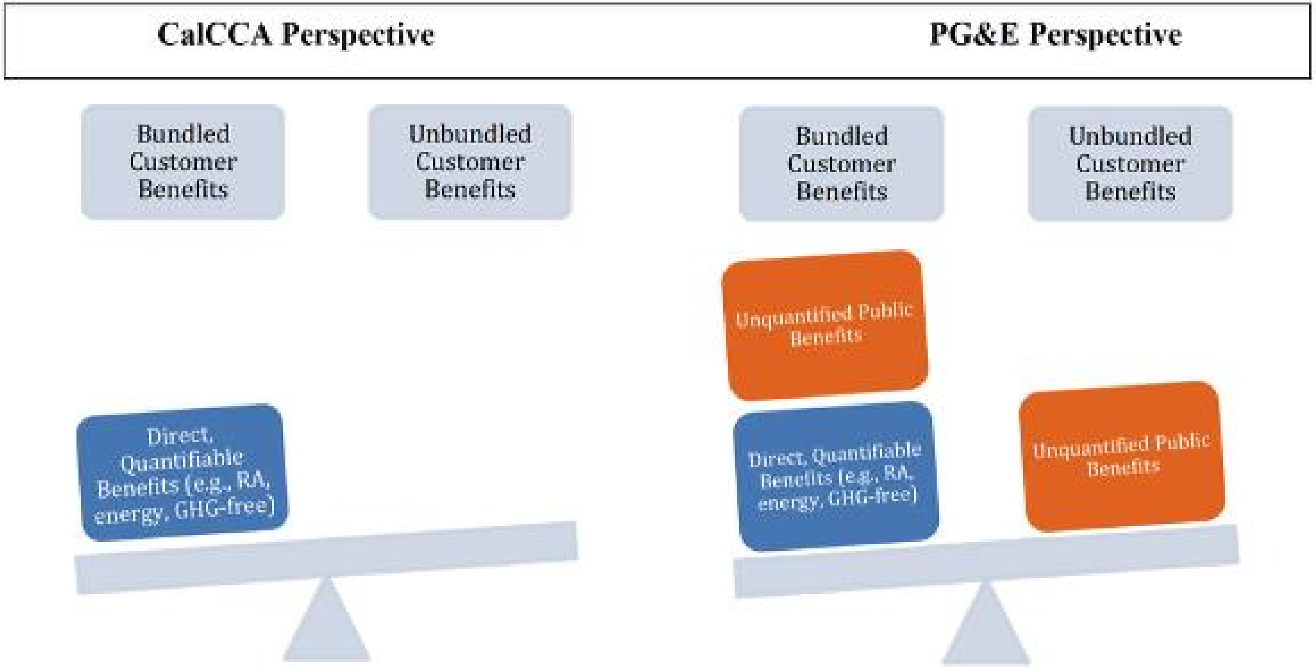
The Commission Should Reject PG&E's Arguments Against Re-Vintaging



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The Commission Should Remove Hydro Facilities That are Not Used and Useful from the Revenue Requirement

- <u>**Core problem**</u>: PG&E admits that **nine** hydro assets remaining in its revenue requirement are **not operational** and **cannot return to generation service** if called upon. PG&E has no plans to return these facilities to generation service, yet it proposes to earn a return on these assets.

- <u>**CalCCA proposal**</u>: Apply Commission longstanding used-and-useful precedent and:
    1. Remove these nine hydro assets from the revenue requirement; and
    2. Allow PG&E to recover any remaining net book value through a no-return regulatory asset, amortized over the test year period.

- <u>**Impact**</u>:
    - These nine assets represent **$40 million of PG&E's 2027 rate base** and **$20 million of the 2027 revenue requirement**.
    - For some, PG&E has continued to earn a return for decades: Centerville out of service since 2011 due to penstock integrity issues; placed in CAISO mothball status in 2021. By the end of the test year, <u>ratepayers will have paid a return on this non-operating asset for **19 consecutive years**</u>.

Appendix: Additional Background Slides

PG&E's Arguments Against Hydro Asset Re-Vintaging

PG&E Position	CalCCA Response
Argues hydro assets provide "public benefits" to all Californians (*e.g.*, safety, reliability, environmental, and recreational benefits).	The relevant question under the PCIA framework is whether the utility's new investment was incurred *on behalf of all customers*, or *just bundled customers*. Putting aside the relevance of this argument, these "public benefits" are unquantifiable, indirect benefits accruing to all Californians; they are not on par with the monetary value streams associated with these assets.
Initially denied the two largest benefits are energy and capacity value, claiming the assets' FERC license obligations (*e.g.*, certain operational and environmental requirements) are "co-equal benefits" in terms of net market value.	PG&E witness admitted on the stand that, in a discovery response she sponsored in PG&E's 2023 Phase I GRC, she confirmed that capacity and energy are the two largest market value streams associated with PCIA-eligible generation resources, with no caveats about FERC license requirements providing "co-equal benefits" in terms of market value.
Initially claimed that when PG&E makes the decision to sell, retire, or reinvest in a hydro asset, it *does not* consider its forecast bundled load and *is not* making its decision on behalf of its bundled customers.	When confronted with *three different sources* explaining PG&E's decision-making in the context of three different hydro assets, PG&E's witness conceded that PG&E's bundled load was a driving factor in PG&E's decision-making in each of those instances.
Suggests that the degree to which an investment is "[r]elated to power production" has bearing on whether the investment should trigger re-vintaging.	None of the re-vintaging criteria endorsed by the Commission evaluate the investment on whether it is "related to power production." Regardless, investments necessary to support the safe operation of generation resources *are* related to power production.
Highlights cost shift that might occur if bundled customers alone are solely responsible for the going-forward decommissioning costs.	There is no dispute between the parties that decommissioning costs can and should be recovered separately from the re-vintaged revenue requirement, so that all customers remain responsible for these costs.
Argues against the re-vintaging recommendations related to specific assets in this case because that "w[ould] impact all three IOUs."	The Commission made clear in both D.18-10-019 and in D.23-11-069 that these fact-specific analyses related to re-vintaging of specific assets *must* occur in utilities' GRCs where the utility has proposed the investments. No dispute between PG&E and CalCCA that the broader policy framework related to PCIA re-vintaging should be decided in the Commission's PCIA Rulemaking.

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No Longer Used and Useful Hydro Assets – Overview

- **Core problem**
  - PG&E is asking ratepayers to keep paying a return on 13 hydro facilities that are unable to generate power. That violates the bedrock ratemaking principle that a utility may earn a return only on property that is used and useful (Smyth v. Ames, 169 U.S. 466; D.84-09-089). Only two Commission-recognized exceptions exist — Plant Held for Future Use, and projects prudently pursued but abandoned during a period of high risk. Neither applies here.

- **CalCCA's proposal**: Remove all 13 assets from the revenue requirement; recover any remaining net book value through a no-return regulatory asset, amortized over the test year period.

- **Context: nine non-operational hydro assets remain in PG&E's rate base**
  - PG&E originally included in its revenue requirement 13 non-operational hydro facilities. CalCCA pushed back, and PG&E acknowledged that four assets were already retired or sold — Coal Canyon, Lime Saddle, Kern Canyon, Chili Bar — and erroneously remained on PG&E's books. PG&E admitted these accounting errors and has since removed all or a portion of these assets from their books, but not the revenue requirement (they will be removed at the next RO model run, for which PG&E has not committed to a timeline).
  - Nine non-operational assets remain— Kilarc & Cow Creek, Kerckhoff 1, Potter Valley, San Joaquin #1A/#2/#3 (Crane Valley), Centerville (DeSabla-Centerville), Inskip (Battle Creek), Hamilton Branch. PG&E's witness confirmed at hearing that these facilities cannot generate electricity and cannot return to service if called upon, and that PG&E has no plans to return these to service.
  - **Financial impact:** These 13 assets represent $45.2 million of PG&E's 2027 rate base and $20.7 million of the 2027 revenue requirement.

- **Illustrative example — Centerville powerhouse:**
  - Out of service since February 2011 due to penstock integrity issues; placed in CAISO mothball status in 2021. By the end of the test year, ratepayers will have paid a return on this non-operating asset for 19 consecutive years.

No Longer Used and Useful Hydro Assets – PG&E's Position

- **PG&E's Post-Hoc "Retirement Test"**
  - PG&E argues these assets stay used-and-useful until they satisfy PG&E's own three-part test: (1) permanent cessation of generation; (2) FERC approval of license surrender; (3) CAISO authorization of permanent retirement.
  - PG&E itself admits that criteria 2 and 3 are merely its own "interpretation of accounting rules" — not law or Commission precedent.
  - Under this test, PG&E could earn a return on a dead asset in perpetuity simply by never applying for retirement approval. PG&E's own witness (Doidge) conceded this at hearing.

- **PG&E's accounting-practice defenses do not limit the Commission's ratemaking authority**
  - PG&E argues that standard accounting practices under the FERC Uniform System of Accounts prevent the remaining nine facilities from being removed from rate base.
  - The Commission has expressly held that the FERC Uniform System of Accounts is "not controlling as to the ratemaking policies" the Commission may adopt (D.03-12-056).
  - The Commission has ordered PG&E to remove non-operational generation facilities from rate base before (D.91107 — Humboldt Bay; D.92-12-057 — Geysers).

- **PG&E's reliance on D.11-05-018 strengthens CalCCA's argument**
  - PG&E relies on an acontextual reading of D.11-05-018 to argue that the Commission should not look only at the operational status of the facility, but rather on the "totality of the circumstances."
  - The circumstances that caused the Commission to allow PG&E to continue earning a return on no longer used and useful electromechanical meters: (1) The Commission had encouraged PG&E to replace these meters with smart meters; (2) The Commission had previously determined that replacing these meters would be cost effective.

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Additional Issues

Issue	Summary	Cost Impact
Reduce the Forecasted Depreciation Expense for Hydro Facilities	PG&E's 2027–2030 forecast overstates depreciation expense because it does not reflect the actual book accumulated depreciation PG&E itself has reported. **CalCCA Ask:** Order PG&E to reduce the forecasted depreciation expense for hydro facilities to align with its own reported accumulated depreciation.	$9.2 million annually
Remove the DCPP DTA From the Revenue Requirement	PG&E improperly included a DTA tied to the legacy DCPP in its 2027 rate base. PG&E has agreed to remove it, citing a recent IRS private letter ruling on normalization. **CalCCA Ask**: Order PG&E to produce all workpapers associated with its removal of the DTA from rate base.	$4.3 million annually
Reduce PG&E's Production O&M Forecast by $34.8 Million Annually	PG&E has neither justified its need for doubling the number of hydro operators, nor shown that it can feasibly hire this many operators. Further, PG&E has not forecasted any offsetting savings from its increased asset and risk management investments, despite recent experience demonstrating that substantial savings are possible and its acknowledgment that its asset and risk management investments will result in cost savings. **CalCCA Ask:** Reduce PG&E's Production O&M forecast by $34.8 million annually.	$34.8 million annually
PG&E's Failure to Implement FERC Order No. 898 Overstates the Revenue Requirement	PG&E completed the mandatory Uniform System of Accounts reclassifications for book purposes in April 2025 but excluded them from this case's revenue requirement, continuing to rely on obsolete functional allocations. PG&E does not dispute that the reclassification is required or that it would reduce the Electric Generation revenue requirement — it only asks to defer implementation to an unspecified future date, even after months of discovery, testimony, and briefing. **CalCCA Ask:** Order PG&E to complete the reclassifications within 6 months of the final decision, with balancing-account treatment to refund revenues collected under the obsolete allocations in the interim.	$18.8 million annually ($6.9M in plant balances + $11.9M in associated depreciation expense)
Reject PG&E's One-Off CGI Allocation Change	PG&E proposes to keep allocating all Common, General, and Intangible (CGI) plant on a labor-based allocator, except for one carve-out: it wants to direct-assign hydro license intangible costs to Electric Generation. Selective, one-off departures produce inconsistent allocations and shift costs between customer classes. **CalCCA Ask:** Require PG&E to conduct a comprehensive study of all CGI cost allocations before making any changes; until then, PG&E should refrain from ad hoc allocation changes.	$36.0 million annual reduction to Electric Generation revenue requirement

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Additional Issues

Issue	Summary	Cost Impact
PG&E's Method of Tracking Accumulated Depreciation Hinders Fair Cost Allocation	PG&E tracks accumulated depreciation only at the FERC account level for its entire hydro fleet — not by individual facility. That made sense when PG&E served one undifferentiated customer base, but it now prevents accurate cost allocation between bundled and departed-load (CCA) customers, including for future re-vintaging determinations. PG&E opposes primarily because (1) it has not been required to depreciate individual hydro assets in the past; and (2) unspecified burdens and costs of changing depreciation methods. **CalCCA Ask:** Order PG&E to begin tracking plant, accumulated depreciation, depreciation expense, and Accumulated Deferred Income Tax at the hydro facility level.	Foundational fix — enables accurate allocation going forward; no standalone dollar figure in the record
PG&E's Outdated CCA Billing Service Fees Overcharge CCA Customers	PG&E's fees for billing services performed on behalf of CCAs (Meter Data Management, Rate-Ready Billing, Bill-Ready Billing) are still based on a 2017 cost study using 2015 cost and volume data, despite dramatic growth in CCA customer counts since then. From 2020–2024, PG&E collected **$10.3 million more** in DA/CCA billing revenue than its corresponding cost to serve, and credited the overcollection to *all* customers instead of refunding it to the CCAs who overpaid. **PG&E did not respond to this argument at any stage of the case** — effectively a concession. **CalCCA Ask:** Order PG&E to perform an updated cost study in its next Phase II GRC and cap/refund billing revenue above forecast cost through the ERRA compliance proceeding.	$2.5 million annually (revenue cap going forward); $10.3 million historical overcollection (2020–2024)
Limit the HLBA to Costs That Are Truly Unpredictable and Uncontrollable	Balancing-account treatment is meant for costs that are unpredictable, variable, and outside PG&E's control — not for costs PG&E can forecast and manage in base rates. PG&E now proposes to run 43–57% of its forecast 2027–2030 hydro capital through the HLBA, eliminating the normal incentive to control spending. **CalCCA Ask:** Deny HLBA treatment for: (1) **Security** — recurring, foreseeable FERC-required work (~$127.6M forecast 2027–2030); (2) **Spillway** — large discrete capital projects like the McCloud Spillway Improvement, 72% of a $499.8M forecast, no different from any other capital project; (3) **LGUWR** — routine maintenance-type work (vegetation management, erosion mitigation, seismic retrofits, etc.). Limit **License Conditions** recovery to facilities that have *not yet* received their FERC license as of the GRC filing — $62.5M of the forecast relates to facilities already licensed before this case was even filed, so there is no remaining uncertainty to justify balancing-account treatment.	Reclassifies ~$1 billion in 2027–2030 forecast capital from guaranteed balancing-account recovery to ordinary base-rate treatment

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California Community Choice Association's Issues in PG&E's Phase I GRC

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