



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

Order Instituting Rulemaking to Modernize
the Electric Grid for a High Distributed
Energy Resources Future.

Rulemaking 21-06-017

FILED

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**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
INDEPENDENT PROFESSIONAL ENGINEER
PRELIMINARY DATA ADEQUACY REPORT FOR 2025-2026 GNA/DUPR DATA**

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Dated: September 4, 2026

Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

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Pursuant to the *Administrative Law Judges’ Ruling Setting Schedule for the 2026-2027 Distribution Planning and Execution Process Cycle*, issued April 20, 2026, Pacific Gas and Electric Company (PG&E) hereby provides the “IPE Preliminary Data Adequacy Report” for 2025-2026 GNA/DUPR data, prepared by Resource Innovations and attached hereto as Attachment A.

Respectfully submitted,

BENJAMIN C. ELLIS

By: /s/ Benjamin C. Ellis
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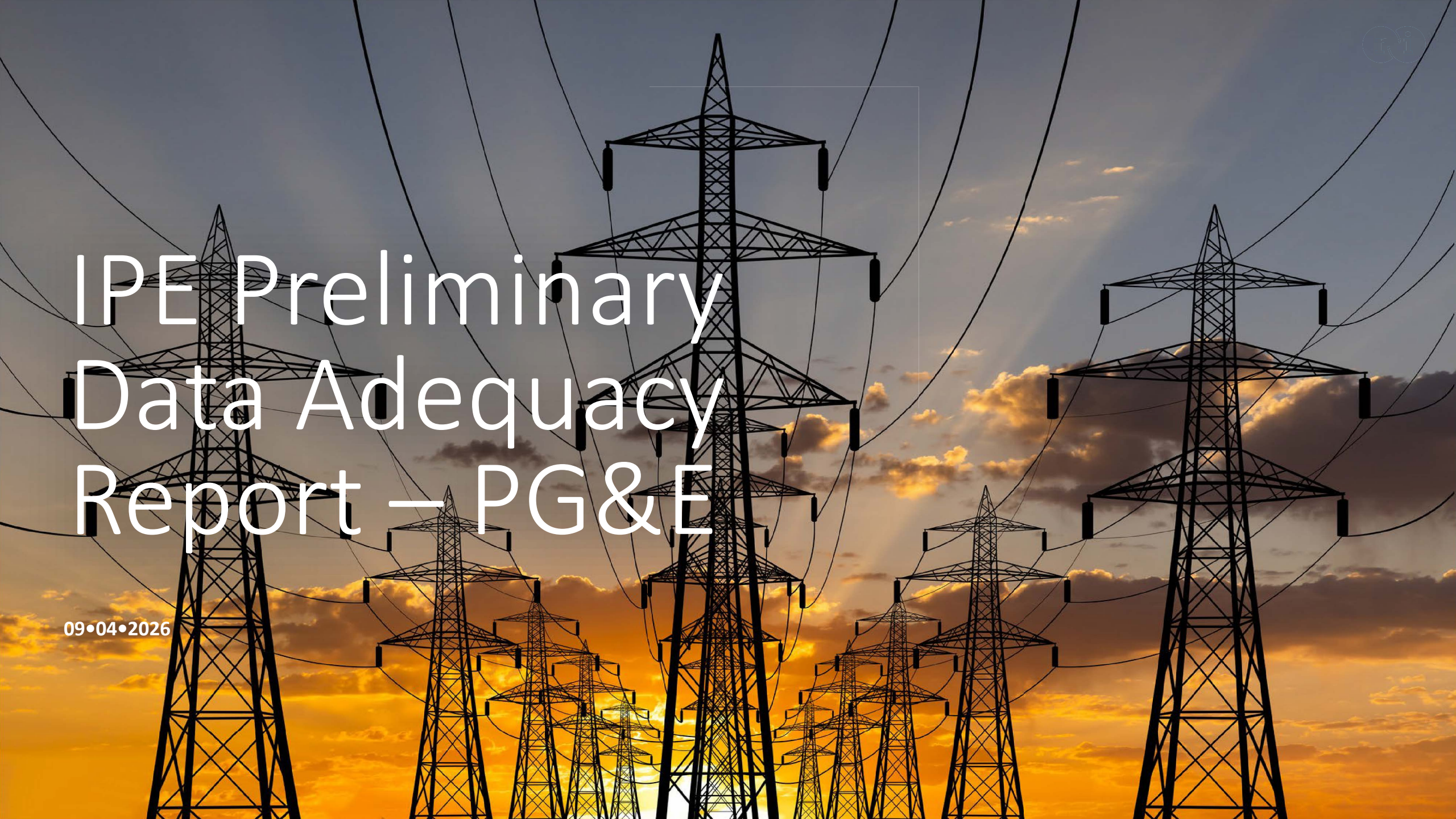
Dated: September 4, 2026

Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

Attachment A

IPE Preliminary Data Adequacy Report –

Pacific Gas and Electric Company



IPE Preliminary Data Adequacy Report — PG&E

09•04•2026

Topics

- IPE Scope
- Deliverables
- IPE Plan Status/Data Adequacy



IPE Scope

- IPE scope of work:
 - Established in 2020/21 Cycle by CPUC Ruling of 4/13/2020
 - New steps added in this cycle for pending loads and scenario planning
 - Covers 28 business process steps (listed in the IPE Plan and later in this presentation)
 - Starting with actual load data collection/adjustment for weather, forecasting system load and DER growth, system load disaggregation all the way to the planning and execution of distribution projects
 - Plan includes Verification and Validation for each business process step
- Verification of the following steps were skipped in this cycle since the ED and the IPE determined that it was not expected to yield additional insights
 - Steps 5-7 - Convert Peak Growth to 8760 Profile, Determine Net Load and Peak Load.
 - Steps 9-11 - Initial Comparison to Equipment Ratings, Evaluate No Cost Solutions and Comparison to Equipment Ratings after No Cost Solutions.
 - Step 14 - Development of capital costs for the planned investments.

IPE Scope (contd.)

- IPE scope of work:
 - Verification and validation of the following steps will not be performed in this cycle since the requirement for DIDF solicitations have been eliminated as per the 2024 Decision
 - Step 15 - Development of Candidate Deferral Projects
 - Step 16 - Development of operational requirements for CDOs
 - Step 17 - Prioritization of Candidate Deferral Projects into Tiers
 - Step 18 - Calculation of LNBAs for planned projects
 - In addition, the following steps will be skipped in this cycle.
 - Step 19 - Compare 2025 forecast and actuals at circuit level
 - Step 21 - Review plan for changes to the planning process for the next cycle
 - Step 22 - Review implementing of planning standard and/or planning process
 - Step 23 - Review list of internally approved capital projects
 - Step 25 - Track solicitation results to inform next cycle

IPE Scope (contd.)

- New Steps added in the cycle include*:
 - Step 4b - Determine hot spots
 - Step 4c - Gather Pending Loads data used in Step 2
 - Step 13b - Develop solution for single investment plan
 - Step 13c - Determine if planned solutions/projects identified in previous cycles continue to be needed and are the appropriate solution to meet the need (project scope and timing)
 - Step 20b - Analyze pending load tracking dataset. Review categorization of PL and supporting information.

Note: These steps are only required to the extent each utility is implementing hot spots for pending loads and/or scenario planning

Plan/Reports and Target Timing

- Final IPE Plan submitted on August 17, 2026
- IPE Preliminary Analysis of GNA/DUPR Data Adequacy (this report) for all three IOUs submitted September 4, 2026
- IPE DPAG Report for each IOU presenting GNA/DUPR review findings and Verification & Validation outcomes due on November 6, 2026
- IPE Post DPAG Report covering all three IOUs, comparing their filings, reviewing compliance, and making recommendations for process improvements due on March 15, 2027

Preliminary Review of Data Adequacy

- Format follows IPE Plan for the utility
- Provides brief description of the process and the approach
- Provides status of the data provided
- Provides indication of the adequacy of the data supplied or planned to be supplied to the IPE to perform its V&V review
 - Adequate demo/data provided
 - Demo/data not yet provided but planned to provided
 - No demo/data required
- Data supplied to IPE at this time is more detailed than is provided to the service list so the indications of adequacy above may not apply to the what might be adequate for stakeholders use since they may have received less information. Per CPUC decision, all data provided to the IPE will also be made available to stakeholders (unless confidential).

Preliminary Review of Data Adequacy (2)

Step	Description	Verification Approach	Status
1	Collect 2025 actual circuit loading and adjust for weather as needed	IPE analysis of data and process provided by PG&E	Adequate data provided
2	Determine load and DER annual growth at the system level used in the DPEP including the application of IEPR caps.	IPE analysis of data and process provided by PG&E	Adequate data provided
3	Disaggregate load and DER annual growth to the circuit level	IPE analysis of data and process provided by PG&E	Adequate data provided
3a	Check sum of all disaggregated load and DERs same as CEC IEPR System Level values	IPE analysis of data and process provided by PG&E	Adequate data provided
4a	Gather Known Load data that is used in Step 2	IPE analysis of data and process provided by PG&E	Adequate data provided
4b	Determine Hot Spots	Not included in this cycle per Final IPE Plan	N/A
4c	Gather Pending Loads data used in Step 2	IPE analysis of data and process provided by PG&E	Adequate data provided
5	Convert peak growth to 8760 profile as needed	Not included in this cycle per Final IPE Plan	N/A
5a	Convert DER growth to 8760 profile as needed	Not included in this cycle per Final IPE Plan	N/A

Preliminary Review of Data Adequacy (3)

Step	Description	Verification Approach	Status
6	Derive net load profile	Not included in this cycle per Final IPE Plan	N/A
7	Determine net peak load	Not included in this cycle per Final IPE Plan	N/A
8	Adjust for "extreme weather"	IPE review of data and process documentation	Adequate data provided
9	Initial comparison to equip. ratings to determine if ratings exceeded	Not included in this cycle per Final IPE Plan	N/A
10	Evaluate no cost solutions – incorporate load transfers, phase balancing, correct data errors	IPE analysis of data and process provided by PG&E	Demonstration/Data to <u>be provided</u> by early September (Late August in as per the IPE Plan)
11	Comparison to equip. ratings to determine if ratings exceeded	Not included in this cycle per Final IPE Plan	N/A
12	Compile GNA tables showing need amount and need timing, <u>etc.</u> (consistent with IOU's documented planning standards and/or planning process)	IPE analysis of data and process provided by PG&E	Demonstration/Data to <u>be provided</u> by early September as per the IPE Plan
13a	Develop recommended solution and generate list of Planned Investments (follow the IOU's documented planning standards and/or planning process)	IPE analysis of data and process provided by PG&E. Demo, if needed.	Demonstration/Data to <u>be provided</u> by early September as per the IPE Plan
13b	Develop solution for single investment plan	Not included in this cycle per Final IPE Plan	N/A

Preliminary Review of Data Adequacy (4)

Step	Description	Verification Approach	Status
13c	Determine if planned solutions/projects identified in previous cycles continue to <u>be needed</u> and are the appropriate solution to meet the need	IPE analysis of data and process provided by PG&E	To <u>be provided</u> in early September as per the IPE Plan
14	Estimate capital cost for Candidate Deferral Projects	Not included in this cycle per Final IPE Plan	N/A
15	Development of Candidate Deferral Projects list through application of screens (timing and technical)	Not included in this cycle per Final IPE Plan	N/A
16	Development of operational requirements (daily, monthly annually <u>etc.</u>)	Not included in this cycle per Final IPE Plan	N/A
17	Prioritization of candidate deferral projects into Tiers	Not included in this cycle per Final IPE Plan	N/A
18	Calculate LNBA ranges and values for all planned investments	Not included in this cycle per Final IPE Plan	N/A
19	Compare 2025 load forecast and actuals at circuit level for selected number of distribution circuits	Not included in this cycle per Final IPE Plan	N/A
20a	Analyze known load tracking dataset and verify the calculation of known load metrics	IPE verification of data and process provided by PG&E	Data to <u>be provided</u> by early October as per the IPE Plan
20b	Analyze pending load tracking dataset. Review categorization of PL and supporting information.		Data to <u>be provided</u> by early October as per the IPE Plan
22	Review implementing of planning standard and/or planning process	Not included in this cycle per Final IPE Plan	N/A

Preliminary Review of Data Adequacy (5)

Step	Description	Verification Approach	Status
23	Review list of internally approved capital projects	Not included in this cycle per Final IPE Plan	N/A
24	Respond to and incorporate DPAG comments	N/A	To be completed after the DPAG meeting. Date to be set by CPUC
25	Track solicitation results to inform next cycle	Not included in this cycle per Final IPE Plan	N/A
26	Treating confidential material in the IPE report	Process agreed to by ED, PG&E and IPE	Process to be followed prior to completion of IPE Report
27	Review methodology used for prioritization of planned projects	IPE analysis of data and process provided by PG&E.	Data to be provided by Late September/Early October
28	Review project execution tracking data and metrics	IPE analysis of data and process provided by PG&E. Demo, if needed.	Date to be completed by Late September/Early October

Comments/Questions