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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Authorization to Recover Costs Related to Its Enterprise Resource Planning and Geographic Information Systems. (U 39 M)	Application No. 26-11-_____

APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 M) FOR AUTHORIZATION TO RECOVER COSTS RELATED TO ITS ENTERPRISE RESOURCE PLANNING AND GEOGRAPHIC INFORMATION SYSTEMS

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Pursuant to California Public Utilities Code sections 451, 454, 701, and 702 and Rules 2.1 and 3.2 of Rules of Practice and Procedure of the California Public Utilities Commission (Commission), Pacific Gas and Electric Company (PG&E) respectfully submits this Application seeking authorization to recover costs associated with modernizing its Enterprise Resource Planning (ERP) and Geographic Information System (GIS) platforms and related business processes. This modernization effort will replace PG&E's expiring technology platforms with current, vendor-supported technology, and implement business process improvements designed to improve how work is planned, coordinated, executed, and managed under these platforms across PG&E's operations (ERP and GIS Transformation).[1] The Application seeks authorization to implement revenue requirements of $874.1 million for the period November 3, 2026, through December 31, 2030, based on a total forecasted cost of approximately $2.9 billion.

We recognize the affordability challenges facing customers. This Application seeks to implement work that helps us address these challenges more effectively. PG&E forecasts that the resulting

[1] *See* Exhibit (PG&E-1), Appendix C (defining "Transformation" as "[a] comprehensive shift in processes, technologies, or strategies to improve efficiency, productivity, and growth.").

operational efficiencies gained through the completion of the ERP and GIS Transformation will exceed the forecast costs of this Application. Customers will receive the benefit of these efficiencies in future General Rate Cases (GRCs) through lower cost-of-service and revenue requirement requests than would otherwise be required absent the transformation of business processes proposed in this Application.

I. INTRODUCTION

Our ERP and GIS platforms are foundational to PG&E's ability to provide safe, reliable, and affordable service.[2] ERP and GIS serve distinct but complementary functions:

- ***ERP*** provides the systems and information PG&E uses to plan, manage, and account for utility work, including activities such as purchasing, materials management, cost accounting, and financial reporting. ERP supports activities such as work and asset management, workforce management, materials and supply chain, cost accounting and financial reporting, project planning, and human resources.
- ***GIS*** provides the mapping and network information needed to understand where utility assets are located and how they are connected throughout PG&E's electric and gas systems. GIS serves as the system of record for the location and connectivity of utility assets, providing the geographic and network information needed to support engineering, field operations, asset management, outage and emergency response, wildfire mitigation, risk analysis, and regulatory compliance.

Together, these platforms support how we plan, perform, and manage work across PG&E's 70,000 square mile service territory, which includes 106 thousand circuit miles of electric distribution lines, 45.2 thousand miles of natural gas distribution pipelines, and 5.7 thousand miles of transmission pipelines that provide service to 5.5 million electric customer accounts and 4.5 million gas customer accounts.

[2] PG&E's ERP platform, referred to in other forums or internally as "Propel," will be modernized to SAP S/4 High Performance Analytics Appliance (S/4HANA). PG&E's GIS platform, referred to in other forums or internally as "Elevate," will be upgraded to the Esri ArcGIS Platform.

PG&E's current ERP and GIS platforms were implemented in the 1990s and are nearing obsolescence within the next two years. SAP will discontinue mainstream maintenance for PG&E's current ERP platform in 2027,[3] and Esri will discontinue support for PG&E's current GIS platform and related tools in 2028.[4] Replacing these platforms before vendor support expires is necessary to maintain critical operational, cybersecurity, and compliance capabilities, consistent with PG&E's statutory obligation to best serve customers.[5]

A threshold issue presented in this Application is: Whether PG&E should (1) implement a sub-optimal technical upgrade that only replaces its expiring ERP and GIS platforms while largely preserving the status quo, or (2) implement a more customer-beneficial approach that combines platform replacement with business process improvements enabled by modern ERP and GIS platforms?

Between these two alternatives, PG&E determined that a broader modernization of PG&E's operations would provide greater customer and operational value. In addition to replacing expiring technology, the proposed ERP and GIS Transformation will simplify business processes, improve data quality, reduce manual workarounds, and improve operational efficiency across the enterprise.

As discussed in further detail, PG&E forecasts that this broader proposal will generate more than $9 billion in quantifiable benefits over the 2028 through 2039 forecast period, compared to forecast program costs of approximately $2.9 billion.[6] These benefits are expected to improve operational efficiency and reduce future operating and capital costs relative to what would otherwise be required absent the proposed transformation. PG&E intends to reflect forecast efficiencies associated with the ERP and GIS Transformation in future revenue requirement requests, beginning with its 2031 GRC.

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[3] SAP is a German multinational company and the world's largest provider of enterprise platforms, specializing in business process management and ERP solutions that help organizations plan and manage business functions including core operations, finance, human resources, supply chain, procurement, and customer experience.

[4] Esri is a global leader in GIS platforms, location intelligence, and mapping technology that allow organizations to visualize, analyze, and interpret spatial data to make informed decisions.

[5] *See* Pub. Util. Code, § 451 ("Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities…as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.").

[6] *See* Exhibit (PG&E-01), p. 1-10, lines 21-23.

The magnitude of forecast benefits results from the fact that the tens of thousands of PG&E coworkers and contractors who rely on these platforms to plan, perform, and manage work across PG&E's operations will be able to do so more efficiently with the new technology and business processes. This work includes the hundreds of thousands of inspections, repairs, and maintenance activities conducted each year to safely and reliably serve more than 16 million Californians.

When PG&E first adopted its ERP and GIS platforms, the out-of-the box tools did not provide all of the functionality PG&E required. As a result, over the years PG&E has had to implement over 80,000 customizations, and many tasks require employees to work across multiple platforms with extensive manual coordination. PG&E's current ERP and GIS platforms are nearing the end of vendor support and can no longer reliably meet PG&E's long-term operational, cybersecurity, and many other obligations. Once that support expires, PG&E will lose access to the security updates, compatibility enhancements, software corrections, and technical resources necessary to operate and maintain these platforms. Continued reliance on expired ERP and GIS platforms will increase operational, cybersecurity, and compliance risks while making the platforms increasingly difficult and costly to operate and maintain. It is critical that PG&E modernize these platforms and address these challenges before vendor support ends.

To address these risks, PG&E evaluated whether to replace unsupported technology alone or pursue a broader ERP and GIS modernization that includes not only replacement but also addresses the existing operational challenges that stem from the current technology's limitations. Although a technical-only upgrade would address technology obsolescence, that approach would require substantial investment while largely preserving the inefficient processes, fragmented data, and extensive manual coordination across PG&E's broader technology landscape that PG&E developed with the older platforms.[7] As a result, a technical-only upgrade would provide only limited customer benefits. In contrast, PG&E's proposal leverages the ERP and GIS modernization effort as an opportunity to simplify business processes, improve data quality and accessibility, and establish a more efficient

[7] PG&E's broader technology landscape includes more than 700 interconnected business applications that are integrated with the ERP and GIS platforms. *See* Exhibit (PG&E-01), p. 2-14, lines 15-18; Table 2-2.

operating environment in ways that the newer platforms make possible. PG&E also forecasts substantially greater customer benefits, including reductions in future revenue requirements that will benefit customers over time compared to the revenue requirements that would be required under a technical-only upgrade. For these reasons, PG&E determined that the proposed ERP and GIS Transformation would provide greater customer and operational benefits than a technical upgrade alone.

The remaining sections of this Application are organized as follows:

Section II: Summary of Request;

Section III: Overview of PG&E's Application;

Section IV: Overview of PG&E's testimony and workpapers;

Section V: A description of PG&E's statement of relief and authority sought;

Section VI: Statutory and Procedural Requirements; and

Section VII: Conclusion and relief requested.

II. SUMMARY OF REQUEST

PG&E respectfully requests the Commission authorize revenue requirements of $874.1 million associated with the ERP and GIS Transformation for the period November 3, 2026 through December 31, 2030.[8] PG&E will seek to recover revenue requirements incurred after 2030 through future GRC proceedings, beginning with its 2031 GRC.[9] Table 1 summarizes the total forecast program costs and requested revenue requirements associated with the ERP and GIS Transformation in this Application.[10]

[8] PG&E is separately filing a motion seeking authorization to establish memorandum accounts with a requested effective date of November 3, 2026, to record ERP and GIS Transformation costs pending a final decision in this proceeding. PG&E requests a final decision on the motion as soon as practicable during the pendency of this Application.

[9] *See* Exhibit (PG&E-01), p. 4-11, lines 22-28.

[10] The cost, benefit, and financial information presented in this Application reflect the information available to PG&E as of August 2026. See Exhibit (PG&E-01), p. 1-13, fn. 13; p. 1-14, Table 1-1.

TABLE 1
SUMMARY OF PROGRAM COSTS AND REQUESTED REVENUE REQUIREMENTS (MILLIONS OF NOMINAL DOLLARS) [11]

		Recorded	Forecast					
		2023-2025[1]	2026	2027	2028	2029	2030	Total
Cost	Capital	$215.9	$451.6	$601.0	$518.4	$682.1	$236.3	$2,705.3
	Expense	-	-	$12	$47.0	$69.1	$77.3	$205.4

	2026	2027	2028	2029	2030	Total
Revenue Requirement (RRQ)	$1.3	$50.0	$168.8	$255.7	$398.3	$874.1

As shown in Table 2 below, PG&E forecasts that the ERP and GIS Transformation will generate more than $9 billion in quantified benefits over the 2028-2039 period, compared to PG&E's 2024 year spending. These benefits are driven by business process improvements and technology enhancements that increase operational efficiency and reduce future operating costs.

TABLE 2
SUMMARY OF FORECAST BENEFITS
(MILLIONS OF NOMINAL DOLLARS)

Line No.	Description	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	Total
1	Capital	$1.8	$17.4	$159.8	$518.6	$811.7	$865.7	$876.0	$634.7	$545.4	$556.4	$567.7	$569.2	$6,124.4
2	Expense	$2.5	$25.5	$101.3	$275.2	$417.2	$455.2	$466.8	$330.0	$286.1	$292.3	$301.6	$291.5	$3,245.1
3	Total Benefits	$4.3	$42.9	$261.1	$793.7	$1,229.0	$1,320.9	$1,342.9	$964.7	$831.5	$848.7	$869.2	$860.7	$9,369.5

III. OVERVIEW OF PG&E'S APPLICATION

PG&E proposes replacing its expiring ERP and GIS platforms and implementing SAP S/4 High Performance Analytics Applicance (S/4HANA) and the Esri ArcGIS Platform. The proposed ERP and GIS Transformation combines the necessary replacement of those platforms with business process

[11] PG&E's revenue requirement request excludes Revenue Fees and Uncollectibles (RF&U) and interest. *See* Exhibit (PG&E-01), p. 4-1, lines 17-20.

improvements that take advantage of the new technologies' capabilities. This section provides further details regarding PG&E's ERP and GIS Transformation proposal.

A. PG&E Must Replace Its Existing ERP and GIS Platforms Before Vendor Support Ends

Because the ERP and GIS platforms are foundational to operations, PG&E must replace them before vendor support expires. As described in Chapters 1 and 2,[12] these platforms are integrated into virtually every aspect of PG&E's day-to-day operations and enable PG&E to safely and reliably deliver gas and electric service to more than sixteen million customers, manage over 150,000 miles of gas and electric infrastructure, and operate its power generation portfolio.

PG&E currently relies on SAP ERP Central Component (SAP ECC) and Esri ArcGIS Desktop to perform these functions. However, both platforms are approaching the end of vendor support. SAP's mainstream maintenance for PG&E's current ERP platform concludes in 2027, with extended support available only through 2030 at additional cost, while support for the current GIS platform ends in February 2028. Continued reliance on these platforms beyond their support periods would expose PG&E to increasing operational and cybersecurity risks and require growing levels of manual intervention. A significant disruption of either platform could materially impair critical business and field operations by limiting visibility into assets, network connectivity, completed work, crew assignments, and field activities. Such a disruption could slow response times and field updates, reduce workforce productivity, and disrupt essential functions, including outage response, emergency activations, customer connections, payroll and contractor payments, financial transactions, and regulatory reporting.

B. The Proposed ERP and GIS Transformation Provides More Benefits Than A Technical Upgrade Alone

PG&E evaluated three alternatives for replacing its existing ERP and GIS platforms: (1) doing nothing and continuing to operate under the current ERP and GIS environments; (2) a technical-only upgrade of the platforms; and (3) an ERP and GIS Transformation that combines the technical upgrade with broader business process improvements. PG&E determined that the proposed ERP and GIS

[12] Unless otherwise noted, all chapter citations herein are to Exhibit (PG&E-01).

Transformation provides customer and operational value that dramatically exceeds the cost relative to a technical-only upgrade – the incremental $1.4 billion investment yields more than $9 billion in quantifiable benefits.

i. PG&E Evaluated Multiple Alternatives Before Selecting The Proposed ERP and GIS Transformation

PG&E determined that taking no action and continuing to operate with the current platforms is not a viable long-term option, as this approach would preserve growing operational and cybersecurity risks while failing to address the expiration of vendor support.

PG&E considered a technical-only upgrade to be a sub-optimum alternative because existing business processes and operating practices would largely remain unchanged. A technical upgrade would preserve many of the existing challenges that make work more difficult to plan, coordinate, and manage. For example, changes to work plans today often require manual coordination across multiple connected business applications to align labor, materials, contractor services, and financial information. Planning and forecasting activities also frequently require information to be assembled from multiple applications, data sources, and spreadsheets before they can be analyzed and used to support decision-making. PG&E's proposal addresses these limitations through business process improvements enabled by modern ERP and GIS technology, including enhanced integrated workflows, improved access to information, and better integration across PG&E's broader technology landscape.

Based on this evaluation, PG&E selected the proposed ERP and GIS Transformation. As discussed in Sections III.B.ii and III.B.iii below, the proposed ERP and GIS Transformation is expected to generate quantifiable benefits that substantially exceed its costs and provide additional operational and customer benefits.

Notably, replacing the unsupported platforms with a technical-only upgrade would require a substantial investment even absent the proposed ERP and GIS Transformation. As discussed in Chapters 2 and 3, PG&E estimates that the technical-only upgrade alternative would require approximately $1.5 billion of investment, while providing only approximately $173 million in benefits.[13] In contrast,

[13] *See* Exhibit (PG&E-01), p. 2-16, line 5 to p. 2-17, line 17; p. 2-20, Table 2-3.

PG&E's broader ERP and GIS Transformation proposal seeks funding for a $2.9 billion investment that PG&E expects to deliver approximately $9.4 billion in quantifiable benefits over the 2028-2039 period.[14]

A substantial difference in value between the technical upgrade alternative and the proposed ERP and GIS Transformation is driven by improvements across six core functional workstreams. Under the proposed ERP and GIS Transformation, PG&E will redesign and standardize business processes across these areas in ways that have not been possible with the current platforms to improve how work is planned, coordinated, executed, and supported across the enterprise. The figure below summarizes these workstreams, and the discussion that follows describes the expected areas of improvement under the ERP and GIS Transformation.[15]

FIGURE 1
FUNCTIONAL WORKSTREAM SUMMARY



[14] *See* Exhibit (PG&E-01), p. 2-20, Table 2-3. *See also* Exhibit (PG&E-01), p. 3-3, Table 3-2.

[15] *See* Exhibit (PG&E-01), p. 2-26, line 1 to p. 2-45, line 5.

1. **Work and Asset Management:**

   Today: Work planning, scheduling, execution, and asset health information are managed across multiple platforms and disconnected tools, making it difficult for PG&E workers to adjust efficiently when field conditions change.

   Future State: PG&E's proposed solution will support planning, scheduling, execution, and closure of maintenance and project work through integrated ERP and GIS workflows. PG&E's proposal will also better coordinate crew dispatch, outage planning, asset condition and location data, maintenance history, and compliance requirements.

2. **Supply Chain:**

   Today: Limited integration between work planning, materials planning, and logistics can make it difficult to respond efficiently to changes in work plans, increasing the risk of material shortages, expedited purchases, and excess inventory. Contractor and vendor management also relies on manual, paper-based processes.

   Future State: PG&E's proposal will integrate forecasting, sourcing, purchasing, warehousing, staging, delivery, and contractor management with planned and emergency work, providing clearer and earlier visibility into material and service needs.

3. **Finance:**

   Today: Financial information is maintained across multiple data sources, requiring significant manual effort to assemble data and perform analyses that support decision-making.

   Future State: PG&E's proposal will integrate budgeting, forecasting, project accounting, cost management, rate and recovery data, and regulatory reporting, providing more timely and consistent financial information to support day-to-day operations.

4. **Human Resources:**

   Today: Workforce planning, time reporting, and skills management rely on multiple processes and sources of workforce information, which can make it more difficult to align qualified personnel with operational needs.

   Future State: PG&E's proposal will integrate workforce planning with scheduling, time reporting, qualifications, skills requirements, and workforce availability.

5. **Integrated Planning:**

   Today: Planning across work, materials, staffing, locations, and costs occurs across multiple process, data sources, and spreadsheets, often requiring manual reconciliation when conditions change.

Future State: PG&E's proposal will provide a connected planning environment that aligns work plans, workforce requirements, material needs, locations, and costs to support more coordinated planning and decision-making.

6. **Enterprise Health and Safety:**

Today: Health and safety requirements are often managed alongside operational work processes and may rely on manual checks or after-the-fact documentation.

Future State: PG&E's proposal will integrate operational and process safety risk assessments, incident management, management of change, and regulatory reporting directly into work planning, field execution, and work closure.

The following table summarizes key differences between the proposed ERP and GIS Transformation and the other alternatives evaluated by PG&E:

TABLE 3
COMPARISON OF ALTERNATIVES EVALUATED BY PG&E (IN MILLIONS)[16]

Line No.	Option	Forecast Cost	Quantified Benefits	Principal Risk and Customer-Value Tradeoff	PG&E Determination
1	Do Nothing	--	$0	Temporarily sustains the current environment but does not provide a long-term solution. Defers the ERP and GIS platform transition, and does not address the increasing operational, cybersecurity, and vendor-support risks associated with the current environment.	Neither prudent nor viable as a long-term solution because it fails to address expiring vendor support and associated risks.
2	Technical Upgrade	$1,488.5	$172.9	Establishes supported ERP and GIS platforms but largely preserves existing processes, applications, customizations, handoffs, and operating complexity. Delivers limited benefits relative to cost and may require additional future investments to address underlying technology limitations.	Not selected because it not adequately address underlying process, data, and technology limitations or generate sufficient benefits relative to cost.

[16] *See* Exhibit (PG&E-01), p. 2-20, Table 2-3.

3	ERP and GIS Transformation	$2,910.7	$9,369.5	Requires the largest investment and carries implementation and risks, but addresses the necessary ERP and GIS platform transition, drives business improvements, and generates substantially greater customer and operational benefits than a technical upgrade alone.	Selected as the most prudent and cost-effective long-term option because it combines the platform replacement with operational improvements that generate substantially greater customer benefits than a technical upgrade alone.

ii. The Proposed ERP and GIS Transformation is Expected to Generate Quantifiable Benefits that Exceed its Cost

As described in Chapters 2 and 3, PG&E forecasts over $9 billion in quantified benefits over the 2028 through 2039 forecast period, compared to approximately $2.9 billion in program costs.[17] The following table summarizes forecast benefits by platform and benefit category over the 2028 through 2039 period.

TABLE 4
SUMMARY OF FORECAST BENEFITS BY PLATFORM AND BENEFIT CATEGORY[18]
2028-2039
(MILLIONS OF NOMINAL DOLLARS)

	Description	Sub-Total
ERP		
	Asset Reliability and Work Execution Effectiveness	$5,740.6
	Supply Chain Optimization and Materials Availability	$2,156.2
	Financial Discipline and Performance Management	$41.0
	Workforce Enablement and HR Process Improvement	$24.8

[17] PG&E's Benefit Cost Ratio and supporting calculations are described in Exhibit (PG&E-01), p. 3-126, line 15 to p. 3-130, line 13.

[18] *See* Exhibit (PG&E-01), p. 3-92, Table 3-36.This Table provides an annual breakdown of forecast benefits by platform and benefit category.

	Health, Safety and Compliance Improvement	$194.5	
	Overall Technology Modernization and Platform Simplification	$163.1	
ERP Total			**$8,320.3**
GIS			
	Asset Reliability and Work Execution	$694.1	
	Supply Chain Optimization and Materials Availability	$48.0	
	Overall Technology Modernization and Platform Simplification	$307.1	
GIS Total			**$1,049.2**
Overall Total			**$9,369.5**

PG&E expects the business process improvements and technology enhancements enabled by the ERP and GIS Transformation to reduce costs over time and generate customer benefits that exceed the program's costs and dramatically exceed the incremental investment relative to a technical upgrade. PG&E expects to reflect these efficiencies in future revenue requirement requests, beginning with its 2031 GRC. For example, relative to the costs PG&E forecasts it would incur without the ERP and GIS Transformation, and using 2024 spending as the baseline, PG&E's proposal is expected to reduce capital expenditures by approximately $3.1 billion and Operations and Maintenance expenses by approximately $1.6 billion during the 2031-2034 GRC period.[19]

iii. The ERP and GIS Transformation Is Expected to Deliver Significant Other Benefits, Including Benefits That Support Safe, Reliable, and Affordable Service

In addition to the substantial quantifiable benefits discussed above, the ERP and GIS Transformation will provide additional benefits, including improved user experiences, higher-quality data, stronger security and audit controls, and better information to support operational planning and decision-making. [20] By improving the processes, data, and technology capabilities that underpin PG&E's

[19] The forecast reductions presented here are based on current forecasts. The reductions ultimately reflected in future revenue requirement requests will be based on the best information available at the time of filing and may differ from the estimates presented in this Application. *See* Exhibit (PG&E-01), p. 1-11, lines 1-17.

[20] *See* Exhibit (PG&E-01), p. 2-24, Table 2-4.

operations, the ERP and GIS Transformation will strengthen PG&E's ability to safely and reliably serve customers while helping to reduce costs over the long term.

Safety. Safety is a central consideration in this Application. ERP and GIS support many of the core processes PG&E uses to safely operate and maintain its electric systems, gas systems, and power generation. Modernizing PG&E's ERP and GIS platforms will enable them to remain capable of supporting PG&E's evolving operational, cybersecurity, and compliance requirements.

The proposed ERP and GIS Transformation will support safe operations by helping PG&E identify and manage risk, prioritize critical work, and maintain the information and processes needed to safely operate and maintain its electric, gas and power generation systems. Chapter 2 details several categories of forecast benefits supporting safer utility operations, including the following:[21]

Benefits Addressing Safety Considerations	
Benefits Category	Description
Asset Reliability and Work Execution Effectiveness	Improvements in how PG&E plans, designs, schedules, executes, documents, and manages utility work throughout the asset lifecycle.
Workforce Enablement and HR Process Improvement	Improvements in workforce planning, training and skills qualifications, attendance management, payroll administration, and employee administration activities.
Health, Safety and Compliance Improvement	Improvements in how PG&E manages safety documentation, inspections, investigations, corrective actions, and compliance records.
Security Controls and Auditability	Enhances security controls and auditability through role-based access and improved transaction traceability.
Improved Data Quality, Governance, and Transparency	Improves data quality, governance, and transparency through standardized data management practices, consistent reporting, and enhanced visibility into business information.
Integrated Enterprise Planning and Decision-Making	Enhances enterprise planning and decision-making by integrating financial, operational, and asset information into a unified platform.

[21] *See* Exhibit (PG&E-01), p. 2-24 to 2-25, Table 2-4.

Reliability. The modernized ERP and GIS platforms will better connect asset information with work planning and execution, bringing together information regarding asset condition, maintenance history, inspection results, planned work, labor, materials, and network connectivity. These capabilities will support more effective maintenance and mitigation activities, improve the accuracy of asset information, and help direct resources to high-priority work. The proposed ERP and GIS Transformation will also enhance visibility into PG&E's electric and gas networks through improved asset connectivity information, network tracing, analysis, and data validation capabilities.[22] Together, these improvements are expected to enhance asset performance, reduce equipment failures and customer interruptions, support outage restoration, and improve the reliability of PG&E's operations.

Affordability. The proposed transformation is a key part of PG&E's long-term plan to address customer affordability. However, as discussed above, PG&E must invest in at least a technical upgrade of its ERP and GIS platforms to replace expiring technology. By making the additional investment necessary to modernize business processes and fully leverage modern ERP and GIS capabilities, PG&E expects to reduce costs over time and generate benefits that substantially exceed program costs. The full transformation therefore advances the shared objectives of PG&E, the Commission, and customers to promote long-term affordability.

C. PG&E Has Developed A Comprehensive Implementation Strategy To Successfully Deliver The ERP and GIS Transformation

The proposed ERP and GIS Transformation is supported by several years of planning, design, and evaluation activities. As described in Chapter 2, PG&E developed and refined the proposed ERP and GIS Transformation through Phase Zero planning,[23] Enterprise Design,[24] and additional

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[22] See Exhibit (PG&E-01), p. 2-47, lines 27-31; p. 2-48, line 30 to p. 2-49, line 3; p. 2-75, line 31 to p. 2-76, line 6.

[23] "Phase Zero" established the strategic direction, high-level scope, and initial business case for the proposed Transformation based on an evaluation of platform options and business and technical requirements. *See* Exhibit (PG&E-01), p. 2-11, line 18 to p. 2-12, line 12.

[24] "Enterprise Design" represents the design phase used to validate the future-state solution and refined the implementation approach, scope, costs, and benefits underlying the proposed Transformation. *See* Exhibit (PG&E-01), p. 2-12, line 25 to p. 2-13, line 2.

implementation planning activities to define the future-state solution, evaluate implementation alternatives, and develop the cost and benefit forecasts supporting this Application.

PG&E will deploy GIS capabilities between 2027-2029 and ERP capabilities between 2027-2030. PG&E selected a phased implementation strategy consisting of three ERP releases and three GIS releases. The phased release sequences reflect PG&E's business priorities, system dependencies, operational readiness, and technical requirements. The sequences are designed to reduce implementation risk, manage program complexity, maintain operational continuity, and begin realizing benefits earlier in the program's lifecycle.[25] PG&E rejected a single-phase enterprise-wide deployment because implementing all changes at the same time would increase the potential for operational disruption and make it more difficult to contain implementation issues.

As described in Chapter 2, PG&E's current ERP platform includes more than 82,000 customizations and supports more than 600,000 work orders and approximately 420,000 new assets each year. [26] PG&E's GIS platform contains millions of spatial features and associated attributes across multiple asset classes.[27] For the proposed ERP and GIS Transformation, PG&E must convert, validate, integrate, and deploy this data into the new ERP and GIS platforms while continuing to safely and reliably serve more than 16 million customers. This scale and complexity further support PG&E's phased implementation approach and focus on disciplined program execution.

Chapter 2 also describes the governance framework PG&E has established for the ERP and GIS Transformation, including program management, organizational readiness, and quality assurance functions. Collectively, these functions provide the oversight and accountability required to manage program schedule, cost, risk, and benefits throughout implementation. Together with the phased deployment strategy, this governance framework supports a disciplined and practical approach to delivering the ERP and GIS Transformation while managing implementation risk.

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[25] *See* Exhibit (PG&E-01), p. 2-64, line 16 to p. 2-65, line 15.

[26] *See* Exhibit (PG&E-01), p. 2-2, lines 1-2; p. 2-4, line 24 to p. 2-5, line 1.

[27] S*ee* Exhibit (PG&E-01), p. 2-2, lines 14-19.

IV. PG&E'S TESTIMONY AND WORKPAPERS

This section summarizes the testimony and workpapers that accompany this Application. Witness names are noted following the chapter titles:

Chapter 1, "Executive Summary" (Christine Cowsert) explains the overall rationale for PG&E's proposal to modernize its ERP and GIS platforms, including why both platforms must be replaced without delay. It describes why a comprehensive business transformation is more prudent than either a technical-only upgrade or maintaining the status quo. The chapter also summarizes the forecast costs and expected benefits of the ERP and GIS Transformation, including significant tangible customer benefits anticipated to reduce revenue requirement requests in future general rate cases.

Chapter 2, "Need for Business Technology Upgrade and Modernization" (Raj Basuta, Annabelle Louie, James Kim) defines the ERP and GIS Transformation's scope and implementation approach and explains how the SAP S/4HANA ERP and Esri ArcGIS platforms will support PG&E's future-state operations. It first describes the evolution and limitations of PG&E's current ERP and GIS environments, then addresses the alternatives considered, and describes PG&E's selected scope and proposed workstream capabilities. The chapter then presents the phased implementation strategy, including the coordinated three-release deployment of ERP and GIS, along with the release structure, schedule, and delivery lifecycle. Finally, it identifies the Technology Infrastructure and Software, Technology Enablement, and Application Remediation investments needed to support the transformation.

Chapter 3, "Cost and Benefit Forecast Analysis" (Jenn Conway) presents the cost-and-benefit forecast analysis. It begins with a detailed explanation and supporting rationale for the capital forecast, organized into six cost groups: Solution, Technology Infrastructure and Software, Technology Enablement, Application Remediation, Program Management Office, and Business Enablement. The forecast reflects several years of extensive planning and design activities and incorporates the implementation risks associated with a multi-year enterprise transformation. The resulting cost estimate reasonably reflects the scale and complexity of PG&E's proposal. The chapter then presents the expense forecast for the Solution and Technology Infrastructure and Software cost groups. It also discusses the

$9,369 million in expected transformation benefits, explains the methodology used to estimate those benefits, and calculates the benefit-to-cost ratio. The chapter concludes with a discussion of incrementality and alternative scenarios for modernizing ERP and GIS.

Chapter 4, "Results of Operations" (Marques Cruz) presents the Results of Operations for this request, including PG&E's 2027–2030 revenue requirement of $874.1 million. The chapter explains that the revenue requirement was calculated using Commission-approved methodologies and provides a breakdown of the Results of Operations calculation, capital revenue requirement components, and the revenue requirement associated with forecast benefits.

Chapter 5, "Cost Recovery" (Rebecca Madsen) explains PG&E's proposed method for recovering through customer rates the costs of transforming its ERP and GIS platforms.

V. PG&E'S STATEMENT OF RELIEF AND AUTHORITY SOUGHT

PG&E requests that the Commission authorize recovery of approximately $2.9 billion in recorded and forecast costs associated with the proposed ERP and GIS Transformation (See, infra, Table 1). The $2.9 billion request translates to a Revenue Requirement of $874.1 million from November 3, 2026 (the date of this Application filing) through December 31, 2030, excluding Revenue Fees and Uncollectibles (RF&U) and Interest, presented in Table 1 (Section II).

Tables 5and 6 below show the estimated 2029 average impact on typical residential customer bills and the average impact on California Alternate Rates for Energy (CARE) participant customer bills for electric and gas residential customers per month as compared to 2026 bills as of the date of this Application, respectively.[28]

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[28] Proposed illustrative customer rate impacts for 2029 are at Attachment C.

TABLE 5
IMPACT ON TYPICAL BUNDLED NON-CARE RESIDENTIAL CUSTOMER BILLS

Commodity	Residential Usage	Current 2026 Average Customer Bill	Estimated 2029 Average Customer Bill	Estimated 2029 Average Customer Bill Increase from 2026 Bills	Estimated 2029 Average Customer Bill Percentage Increase from Current Bills
Electric	500 kWh	$197.51	$200.61	$3.10	1.6%
Gas	31 Therms	$82.69	$84.35	$1.66	2.0%
Combined Bill Total	NA	$280.20	$284.96	$4.76	1.7%

TABLE 6
IMPACT ON TYPICAL BUNDLED CARE RESIDENTIAL CUSTOMER BILLS

Commodity	Residential Usage	Current 2026 Average Customer Bill	Estimated 2029 Average Customer Bill	Estimated 2029 Average Customer Bill Increase from 2026 Bills	Estimated 2029 Average Customer Bill Percentage Increase from Current Bills
Electric	500 kWh	$111.39	$113.33	$1.94	1.7%
Gas	26 Therms	$53.64	$54.75	$1.11	2.1%
Combined Bill Total	NA	$165.03	$168.08	$3.05	1.8%

VI. COMPLIANCE WITH THE COMMISSION'S RULES OF PRACTICE AND PROCEDURE AND OTHER STATUTORY PROVISIONS

A. Statutory and Other Authority

PG&E files this Application pursuant to Public Utilities Code Sections 451, 454, 701, 702, 728, 729, and 795, the Commission's Rules of Practice and Procedure, and prior decisions, orders, and resolutions of the Commission.

B. Legal Name and Principal Place of Business – Rule 2.1(a)

The legal name of the Applicant is Pacific Gas and Electric Company. Since October 10, 1905, PG&E has been an operating public utility corporation, organized under California law. PG&E is engaged principally in the business of furnishing electric and gas service in northern and central California. PG&E's mailing address for this matter is Post Office Box 1018, Oakland, California 94604-1018.

C. Correspondence and Communication Regarding this Application - Rule 2.1(b).

All correspondence and communication regarding this Application should be addressed to Darren P. Roach and Catherine Buckley at the addresses listed below:

Darren P. Roach
Chief Counsel, Law Department
Pacific Gas and Electric Company
300 Lakeside Drive Oakland, CA 94612
Telephone: (925) 750-0041
E-mail: Darren.Roach@pge.com

Catherine Buckley
Manager, Regulatory Proceedings
Pacific Gas and Electric Company
300 Lakeside Drive Oakland, CA 94612
Telephone: (415) 264-4303
E-Mail: Catherine.Buckley@pge.com

Data requests and related issues should be addressed to:

Discovery Contact:

Catherine Buckley
Manager, Regulatory Proceedings
Pacific Gas and Electric Company
300 Lakeside Drive Oakland, CA 94612
E-Mail: Catherine.Buckley@pge.com

D. Categorization - Rule 2.1(c)

PG&E proposes that this Application be categorized as a "ratesetting" proceeding within the meaning of Rule 1.3(g) of the Commission's Rules of Practice and Procedure.

E. Need for Evidentiary Hearings - Rule 2.1(c)

PG&E anticipates that evidentiary hearings will be required. PG&E's proposed schedule is set forth in subsection H below.

F. Issues to be Considered - Rule 2.1(c)

The principal issues to be considered include whether:

1. PG&E's recorded and forecasted cost requests to implement the ERP and GIS Transformation are just and reasonable and should be adopted.
2. PG&E's requested revenue requirement of $874.1 million from November 3, 2026 (date of filing of this application) through December 21, 2030, excluding Revenue Fees and Uncollectibles (RF&U) and Interest, is just and reasonable and should be adopted.
3. PG&E's proposal to implement the ERP and GIS Transformation through a phased deployment schedule is just and reasonable and should be adopted.
4. PG&E's forecast for the quantified and non-quantified benefits associated with the ERP and GIS Transformation, supported by a benefit cost ratio, is just and reasonable and should be adopted.
5. PG&E's request to establish (1) the ERP/GIS Transformation Memorandum Account – Electric and (2) the ERP and GIS Transformation Memorandum Account – Gas to track and record the actual revenue requirements for costs incurred from the filing date of this Application through an effective date of a final decision on this Application requirement is just and reasonable and should be adopted.
    a. If the ERP and GIS Transformation Memorandum Accounts are adopted, what should be the effective date and what costs should be permitted to be recorded to the accounts.

b. If the ERP and GIS Transformation Memorandum Accounts are adopted, whether the amounts recorded to the Accounts, including interest, should be authorized for recovery in the next available rate change or the next Annual Electric True-Up or Annual Gas True-Up Advice Letter.

6. Other forecast and ratemaking proposals should the Commission authorize for the ERP and GIS Transformation.

7. PG&E's proposal to reflect benefits associated with the ERP and GIS Transformation through reductions in revenue requirement requests in its 2031, 2035 and 2039 GRCs is just and reasonable, and, if not, whether additional reporting should be required and how such reporting should be implemented.

G. Relevant Safety Considerations – Rule 2.1 (c)

Rule 2.1(c) requires utilities to clearly state the relevant safety considerations in their applications. Nothing is more important to PG&E than the safety of our customers, employees, contractors, and the communities we serve. As described in Section III.B of this Application, the proposed ERP and GIS Transformation will support PG&E's safe operation and maintenance of its electric and gas systems.

H. Proposed Schedule - Rule 2.1(c)

PG&E proposes the following schedule, assuming that hearings will be required:

PROPOSED SCHEDULE (all dates are approximate)	
Activity	**(Proposed) Date**
Application Filed[29]	November 3, 2026
Protests or Responses (30 days after filing noticed on Daily Calendar)	December 4, 2026
Reply to Protests or Responses (10 days)	December 14, 2026

[29] PG&E will upload its prepared written testimony to the Commission's website in accordance with Rule 13.7(f) of the Commission's Rules after the Docket Office assigns an application number.

PROPOSED SCHEDULE (all dates are approximate)	
Activity	**(Proposed) Date**
Pre-Hearing Conference (PHC)	February 11, 2027
Scoping Memo (30 days after PHC)	March 15, 2027
Intervenor Testimony	May 17, 2027
Concurrent Rebuttal Testimony	July 1, 2027
Evidentiary Hearings (if needed)	August 9-13, 2027
Concurrent Opening Briefs	October 15, 2027
Concurrent Reply Briefs	November 19, 2027
Commission Proposed Decision	February 2028
Commission Final Decision	March 2028

I. Articles of Incorporation - Rule 2.2

PG&E is, and since October 10, 1905, has been, an operating public utility corporation organized under California law. It is engaged principally in the business of furnishing electric and gas services in California. A certified copy of PG&E's Amended and Restated Articles of Incorporation, effective June 22, 2020, was filed with the Commission on July 1, 2020, with PG&E's Application 20-07-002. These articles are incorporated herein by reference pursuant to Rule 2.2 of the Commission's Rules.

J. Balance Sheet and Income Statement - Rule 3.2(a)(1)

Attachment A of the Application presents PG&E's most recent balance sheet and income statement for the period ended September 30, 2026.

K. Statement of Presently Effective Rates - Rule 3.2(a)(2)

PG&E's presently effective electric and gas rates as of March 1, 2026, were filed with the Commission on March 16, 2026, in Application 26-03-017. The rates are incorporated herein by reference.

L. Statement of Proposed Changes and Results of Operations at Proposed Rates - Rule 3.2(a)(3)

The proposed changes and the Results of Operations at Proposed Rates are set forth in Attachments B and C to this Application.

M. Summary of Earnings - Rule 3.2(a)(5) and Rule 3.2(a)(6)

A summary of recorded 2025 revenues, expenses, rate bases and rate of return for PG&E's electric and gas departments was filed with the Commission on August 26, 2026, in Application 26-08-015, and is incorporated herein by reference.

N. Most Recent Proxy Statement - Rule 3.2(a)(8)

PG&E's most recent proxy statement dated April 9, 2026, was filed with the Commission on May 15, 2026, in Application 26-05-007, and is incorporated herein by reference.

O. Type of Rate Change Requested - Rule 3.2(a) (10)

The proposed rate change does not request changes in PG&E's base revenues for the costs PG&E incurs to own, operate, and maintain its gas and electric plants and to enable PG&E to provide service to its customers. The rate increase reflected in this Application passes through to customers.

P. Notice and Service of Application - Rule 3.2(b)

PG&E will, within 20 days of filing this Application, mail a notice stating in general terms the proposed revenues, rate changes, and ratemaking mechanisms required in this Application to the parties listed in Attachment D, including the state of California and cities and counties served by PG&E. PG&E will serve a copy of this application via e-mail to all parties of record in: *PG&E's 2027 General Rate Case* (A.25-05-009), *PG&E's Billing Modernization Initiative* (A.24-10-014), *Southern California Edison's NextGen Enterprise Resource Planning Program* (A.25-03-009), *and Southern California Gas Company and San Diego Gas & Electric Company's Application to Enable its SAP Migration Program* (A.26-05-002).

Q. Newspaper Public – Rule 3.2(c)

PG&E will, within 20 days of filing this Application, publish in newspapers of general circulation in each county in its service area a notice of filing this Application.

R. Bill Insert Notice – Rule 3.2(d)

PG&E will, within 45 days after the filing of this Application, provide notice of this Application to all customers along with their regular bills mailed or emailed that will generally describe the rate change effected in this Application.

S. Attachment List and Statement of Readiness

PG&E is ready to proceed with this case based on the testimony of witnesses regarding the facts and data contained in the accompanying attachments in support of the revenue request set forth in this Application.

A list of the attachments to this Application is provided below:

1. Attachment A: Balance Sheet and Income Statement
2. Attachment B: Results of Operations at Proposed Rates
3. Attachment C: Class Average Present and Proposed Illustrative End-User Gas Rates and Residential Bill Impacts and Class Average Present and Proposed Illustrative End-User Electric Rates and Residential Bill Impacts
4. Attachment D: Service of Notice of Application

VII. CONCLUSION AND REQUEST FOR RELIEF

PG&E respectfully request that the Commission approve its requests as outlined in this Application and supporting testimony, authorize the revenue requirement, and issue orders, findings of fact and conclusions of law as detailed in this Application and supporting testimony; to become effective by July 1, 2028 or as soon thereafter as reasonably practicable, and to issue a final decision:

1. Finding that PG&E's recorded and forecasted cost requests to implement the ERP and GIS Transformation are just and reasonable and should be adopted.
2. Finding that the proposed requested revenue requirement of $874.1 million from November 3, 2026 through December 31, 2030, excluding Revenue Fees and Uncollectibles RF&U) and interest, is just and reasonable and should be implemented in customer rates on the effective date of a final decision on this Application.

3. Finding that PG&E's proposal to implement the ERP and GIS Transformation through a phased deployment schedule is just and reasonable and should be adopted.
4. Finding that PG&E's forecast of the quantified and non-quantified benefits associated with the ERP and GIS Transformation, supported by a benefit cost ratio, is just and reasonable and should be adopted.
5. Approving, by final decision as early in the proceeding as practicable, PG&E's request to establish (1) the ERP/GIS Transformation Memorandum Account – Electric and (2) the ERP and GIS Transformation Memorandum Account – Gas to track and record actual revenue requirements incurred from the filing date of this Application through the effective date of a final decision on this Application.
6. Finding that PG&E's proposal to reflect benefits associated with the ERP and GIS Transformation through reductions in revenue requirement requests in its 2031, 2035, and 2039 General Rate Cases is just and reasonable should be adopted.
7. Granting such additional relief as the Commission may deem just and proper.

Respectfully Submitted,

PACIFIC GAS AND ELECTRIC COMPANY

By: */s/ Francesca P. Pinto*
FRANCESCA P. PINTO

PACIFIC GAS AND ELECTRIC COMPANY
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Email: Francesca.Pinto@pge.com

Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: November 3, 2026

VERIFICATION

I, the undersigned, say:

I am an officer of PACIFIC GAS AND ELECTRIC COMPANY, a California corporation, and am authorized, pursuant to Code of Civil Procedure Section 466, paragraph 3, to make this verification for and on behalf of said corporation, and I make this verification for that reason. I have read the foregoing Application, and I am informed and believe the matters therein are true and on that ground, I allege that the matters stated therein are true.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct.

Executed at Oakland, California, on November 3, 2026.

/s/ Christine Cowsert
Christine Cowsert
Senior Vice President
Enterprise Technology Modernization
Pacific Gas and Electric Company

ATTACHMENT A

PACIFIC GAS AND ELECTRIC COMPANY
CONDENSED CONSOLIDATED STATEMENTS OF INCOME
(in millions)

	(Unaudited)			
	Three Months Ended September 30,		Nine Months Ended September 30,	
	2026	2025	2026	2025
Operating Revenues				
Electric	$ 4,660	$ 4,755	$ 14,015	$ 13,304
Natural gas	1,528	1,495	4,956	4,827
Total operating revenues	**6,188**	**6,250**	**18,971**	**18,131**
Operating Expenses				
Cost of electricity	904	1,015	2,265	2,013
Cost of natural gas	109	131	694	738
Operating and maintenance	2,541	2,636	8,182	8,128
SB 901 securitization charges, net	36	35	36	35
Wildfire-related claims, net of recoveries	—	1	—	100
Wildfire Fund expense	141	86	369	271
Depreciation, amortization, and decommissioning	1,206	1,132	3,434	3,302
Total operating expenses	**4,937**	**5,036**	**14,980**	**14,587**
Operating Income	**1,251**	**1,214**	**3,991**	**3,544**
Interest income	97	91	320	384
Interest expense	(729)	(691)	(2,145)	(2,059)
Other income, net	116	97	334	251
Income Before Income Taxes	**735**	**711**	**2,500**	**2,120**
Income tax benefit	(85)	(202)	(105)	(100)
Net Income	**820**	**913**	**2,605**	**2,220**
Preferred stock dividend requirement	3	3	10	10
Income Available for Common Stock	**$ 817**	**$ 910**	**$ 2,595**	**$ 2,210**

See accompanying Notes to the Condensed Consolidated Financial Statements.

PACIFIC GAS AND ELECTRIC COMPANY
CONDENSED CONSOLIDATED STATEMENTS OF COMPREHENSIVE INCOME
(in millions)

	(Unaudited)			
	Three Months Ended September 30,		Nine Months Ended September 30,	
	2026	2025	2026	2025
Net Income	$ 820	$ 913	$ 2,605	$ 2,220
Other Comprehensive Income				
Pension and other postretirement benefit plans obligations (net of taxes of $0, $0, $1, and $0 respectively)	1	—	1	2
Net unrealized gain (loss) on available-for-sale securities (net of taxes of $3, $1, $7, and $4 respectively)	(3)	(4)	(12)	10
Total other comprehensive income (loss)	(2)	(4)	(11)	12
Comprehensive Income	$ 818	$ 909	$ 2,594	$ 2,232

See accompanying Notes to the Condensed Consolidated Financial Statements.

PACIFIC GAS AND ELECTRIC COMPANY
CONDENSED CONSOLIDATED BALANCE SHEETS
(in millions)

	(Unaudited) Balance at	
	September 30, 2026	**December 31, 2025**
ASSETS		
Current Assets		
Cash and cash equivalents	$ 339	$ 353
Restricted cash and restricted cash equivalents (includes $370 million and $225 million related to VIEs at respective dates)	404	258
Accounts receivable		
Customers (net of allowance for doubtful accounts of $391 million and $408 million at respective dates) (includes $1.8 billion and $1.9 billion related to VIEs, net of allowance for doubtful accounts of $391 million and $408 million at respective dates)	2,205	2,267
Accrued unbilled revenue (includes $1.4 billion and $1.3 billion related to VIEs at respective dates)	1,613	1,463
Regulatory balancing accounts	4,846	6,300
Other (net of allowance for doubtful accounts of $28 million and $69 million at respective dates)	1,635	1,725
Regulatory assets	159	305
Inventories		
Gas stored underground and fuel oil	68	75
Materials and supplies	789	745
Wildfire Fund asset	286	297
Wildfire self-insurance asset	1,008	1,043
Other	865	643
Total current assets	**14,217**	**15,474**
Property, Plant, and Equipment		
Property, Plant, and Equipment	136,222	128,989
Construction work in progress	5,114	4,626
Financing lease ROU asset and other	—	2
Total property, plant, and equipment	**141,336**	**133,617**
Accumulated depreciation	(38,781)	(37,269)
Net property, plant, and equipment	**102,555**	**96,348**
Other Noncurrent Assets		
Regulatory assets	16,531	15,981
Customer credit trust	408	804
Nuclear decommissioning trusts	4,432	4,230
Operating lease ROU asset	448	445
Wildfire Fund asset	3,373	3,728
Other (includes noncurrent accounts receivable of $76 million and $67 million related to VIEs, net of noncurrent allowance for doubtful accounts of $17 million and $15 million and $272 million and $0 of noncurrent restricted cash related to the DOE's Civil Nuclear Credit Program at respective dates)	4,599	4,073
Total other noncurrent assets	**29,791**	**29,261**
TOTAL ASSETS	**$ 146,563**	**$ 141,083**

See accompanying Notes to the Condensed Consolidated Financial Statements.

PACIFIC GAS AND ELECTRIC COMPANY
CONDENSED CONSOLIDATED BALANCE SHEETS
(in millions, except share amounts)

	(Unaudited) Balance at	
	September 30, 2026	**December 31, 2025**
LIABILITIES AND SHAREHOLDERS' EQUITY		
Current Liabilities		
Short-term borrowings	$ 2,205	$ 2,675
Long-term debt, classified as current (includes $227 million and $221 million related to VIEs at respective dates)	1,474	821
Accounts payable		
Trade creditors	3,051	3,352
Regulatory balancing accounts	2,406	3,119
Other	781	844
Operating lease liabilities	94	90
Interest payable (includes $154 million and $72 million related to VIEs at respective dates)	709	673
Wildfire-related claims	173	524
Other	3,174	3,710
Total current liabilities	**14,067**	**15,808**
Noncurrent Liabilities		
Long-term debt (includes $11.5 billion and $11.7 billion related to VIEs at respective dates)	54,729	51,766
Regulatory liabilities	20,369	20,188
Pension and other postretirement benefits	430	482
Asset retirement obligations	5,654	5,439
Deferred income taxes	5,678	4,732
Operating lease liabilities	354	355
Financing lease liabilities	—	2
Other	4,914	4,474
Total noncurrent liabilities	**92,128**	**87,438**
Shareholders' Equity		
Preferred stock	258	258
Common stock, $5 par value, authorized 800,000,000 shares; 264,374,809 shares outstanding at respective dates	1,322	1,322
Additional paid-in capital	39,327	37,505
Reinvested earnings	(505)	(1,225)
Accumulated other comprehensive loss	(34)	(23)
Total shareholders' equity	**40,368**	**37,837**
TOTAL LIABILITIES AND SHAREHOLDERS' EQUITY	**$ 146,563**	**$ 141,083**

See accompanying Notes to the Condensed Consolidated Financial Statements.

ATTACHMENT B

Pacific Gas and Electric Company
ERP Transformation
Workpapers Supporting Chapter 4, Revenue Requirement
Revenue Requirements Estimation ERP Model By Total Company
Results of Operations Calculations

Ln.No.		2026	2027	2028	2029	2030
1	**Operating Revenue:**	1,479,628	46,319,751	114,140,804	147,949,673	264,530,300
	Operating Expenses:					
2	Expense	-	-	-	-	-
3	Production	-	-	-	-	-
4	Storage	-	-	-	-	-
5	Transmission	-	-	-	-	-
6	Distribution	-	-	-	-	-
7	Customer Accounts	-	-	-	-	-
8	Customer Services	-	-	-	-	-
9	Administrative and General	-	-	-	-	-
10	Uncollectibles	-	-	-	-	-
11	Franchise Requirements	-	-	-	-	-
12	Subtotal Expenses	-	-	-	-	-
	Taxes:					
13	Property	26,561	229,501	277,436	242,641	178,987
14	Payroll	0	-	-	-	-
15	Other Taxes	0	-	-	-	-
16	State Corporation Franchise	(12,970)	(11,714,461)	(9,890,442)	(23,978,938)	(21,130,431)
17	Federal Income	52,601	(12,864,983)	10,002,823	(7,407,499)	11,571,919
18	Subtotal Taxes	66,191	(24,349,943)	389,817	(31,143,796)	(9,379,526)
19	**Depreciation**	1,140,076	42,384,760	68,548,463	110,327,307	170,143,848
20	**Total Operating Expenses**	1,206,267	18,034,817	68,938,280	79,183,511	160,764,322
21	**Net for Return**	273,360	28,284,935	45,202,524	68,766,162	103,765,977
22	**Weighted Average Rate Base**	25,522,469	371,681,137	593,988,493	903,628,932	1,363,547,665
23	**Rate of Return:** On Rate Base	1.07%	7.61%	7.61%	7.61%	7.61%
24	On Equity	1.40%	9.98%	9.98%	9.98%	9.98%
	Jurisdictional Allocations (see WP 4-3 and 4-4)					
	Fixed Costs					
25	CPUC	-	-	-	-	-
26	FERC	-	-	-	-	-
27	Total	-	-	-	-	-
	Variable Costs					
28	CPUC	-	-	-	-	-
29	FERC	-	-	-	-	-
30	Total	-	-	-	-	-
31	Capital Revenue Requirement	1,479,628	46,319,751	114,140,804	147,949,673	264,530,300
32	**Total Company Capital Revenue Requirement**	1,479,628	46,319,751	114,140,804	147,949,673	264,530,300
33	**Total Compnay Expense Revenue Requirement**	0	3,553,392	10,172,588	19,351,824	30,676,928
34	**Total CPUC Revenue Requirement**	1,314,846	44,843,215	111,775,834	150,428,397	265,434,266
		-	-	-	-	-

Pacific Gas and Electric Company
GIS Transformation
Workpapers Supporting Chapter 4, Revenue Requirement
Revenue Requirements Estimation GIS Model by Total Company
Results of Operations Calculations

Ln.No.		2027	2028	2029	2030
1	**Operating Revenue:**	(2,676,005)	26,574,066	67,332,085	101,083,846
	Operating Expenses:				
2	Expense	-	-	-	-
3	Production	-	-	-	-
4	Storage	-	-	-	-
5	Transmission	-	-	-	-
6	Distribution	-	-	-	-
7	Customer Accounts	-	-	-	-
8	Customer Services	-	-	-	-
9	Administrative and General	-	-	-	-
10	Uncollectibles	-	-	-	-
11	Franchise Requirements	-	-	-	-
12	Subtotal Expenses	-	-	-	-
	Taxes:				
13	Property	-	-	-	-
14	Payroll	-	-	-	-
15	Other Taxes	-	-	-	-
16	State Corporation Franchise	(2,563,294)	(4,293,615)	(11,529,090)	(7,895,908)
17	Federal Income	(3,635,825)	(2,708,579)	(8,017,168)	10,049,089
18	Subtotal Taxes	(6,199,119)	(7,002,194)	(19,546,259)	2,153,182
19	**Depreciation**	2,084,651	19,137,575	50,244,197	59,413,186
20	**Total Operating Expenses**	(4,114,468)	12,135,381	30,697,939	61,566,367
21	**Net for Return**	1,438,462	14,438,684	36,634,146	39,517,479
22	**Weighted Average Rate Base**	18,902,265	189,733,040	481,394,825	519,283,557
23	**Rate of Return:** On Rate Base	7.61%	7.61%	7.61%	7.61%
24	On Equity	9.98%	9.98%	9.98%	9.98%
	Jurisdictional Allocations (see WP 4-5 and 4-6)				
	Fixed Costs				
25	CPUC	-	-	-	-
26	FERC	-	-	-	-
27	Total	-	-	-	-
	Variable Costs				
28	CPUC	-	-	-	-
29	FERC	-	-	-	-
30	Total	-	-	-	-
31	Capital Revenue Requirement	(2,676,005)	26,574,066	67,332,085	101,083,846
32	**Total Company Capital Revenue Requirement**	(2,676,005)	26,574,066	67,332,085	101,083,846
33	**Total Compnay Expense Revenue Requirement**	8,402,884	36,872,134	49,744,168	46,646,221
34	**Total CPUC Revenue Requirement**	5,149,297	57,047,368	105,268,592	132,830,833

ATTACHMENT C

Pacific Gas and Electric Company
Illustrative Electric Revenue Increase and Class Average Rates
Propel/Elevate Filing: 2029

Line No.	Customer Class	Proposed Revenue Increase (000's)	3/1/2026 Present Rates ($/kWh)	1/1/2029 Proposed Rates ($/kWh)	Percentage Change Compared to Present Rates	Line No.
	Bundled Service*					
1	Residential	$ 54,183	$ 0.32341	$ 0.32866	1.62%	1
2	CARE	$ 15,672	$ 0.21799	$ 0.22183	1.76%	2
3	Non-CARE	$ 38,510	$ 0.39253	$ 0.39871	1.58%	3
4	Small Commercial	$ 14,142	$ 0.40532	$ 0.41192	1.63%	4
5	Medium Commercial	$ 9,879	$ 0.35462	$ 0.35939	1.35%	5
6	Large Commercial	$ 13,492	$ 0.31167	$ 0.31575	1.31%	6
7	Streetlights	$ 416	$ 0.43017	$ 0.43499	1.12%	7
8	Standby	$ 596	$ 0.15016	$ 0.15148	0.88%	8
9	Agriculture	$ 22,817	$ 0.38335	$ 0.38952	1.61%	9
10	Industrial	$ 5,081	$ 0.21616	$ 0.21803	0.87%	10
11	Total	$ 120,605	$ 0.32597	$ 0.33084	1.49%	11
	Direct Access and Community Choice Aggregation Service**					
12	Residential	$ 93,813	$ 0.28161	$ 0.28739	2.05%	12
13	Small Commercial	$ 34,030	$ 0.32441	$ 0.33100	2.03%	13
14	Medium Commercial	$ 22,669	$ 0.26081	$ 0.26545	1.78%	14
15	Large Commercial	$ 41,861	$ 0.21439	$ 0.21813	1.74%	15
16	Streetlights	$ 741	$ 0.32345	$ 0.32826	1.49%	16
17	Standby	$ 186	$ 0.15675	$ 0.15851	1.12%	17
18	Agriculture	$ 8,342	$ 0.27213	$ 0.27747	1.97%	18
19	Industrial	$ 21,324	$ 0.13719	$ 0.13908	1.38%	19
20	Total	$ 222,966	$ 0.23639	$ 0.24080	1.86%	20
	Departing Load***					
21	Residential	$ 1		$ 0		21
22	Small Commercial	$ 3		$ 0		22
23	Medium Commercial	$ 17		$ 0		23
24	Large Commercial	$ 25		$ 0		24
25	Streetlights	$ (0.0)		$ (0.0)		25
24	Standby	$ -			0.00%	24
25	Agriculture	$ 7		$ 0		25
26	Industrial	$ 369		$ 0		26

* Customers who receive electric generation as well as transmission and distribution service from PG&E.

** Customers who purchase energy from non-PG&E suppliers.

*** Customers who purchase their electricity from a non-utility supplier and receive transmission and distribution service from a publicly owned utility or municipality. A rate comparison cannot be provided for Departed Load as the applicable rates vary by specific departed load customer categories and any average rate that could be derived, would not be representative of any particular departed load category.

Illustrative Electric Bill Impacts for Average Residential Customer (500 kWh) - Bundled Service
Propel/Elevate Filing

Line No.	Customer Class	3/1/2026 Present Bill ($)	1/1/2029 Proposed Bill ($)	Bill Change	Bill Percentage Change
	Illustrative Bill Impacts*				
	Residential				
1	CARE	$ 111.39	$113.33	$ 1.94	1.74%
2	Non-CARE	$ 197.51	$200.61	$ 3.10	1.57%

* Average Bundled customer using an annual monthly average of 500 kWh (includes average monthly climate credit).

Pacific Gas and Electric Company
Illustrative Electric Revenue Increase and Class Average Rates
Propel/Elevate Filing: 2029

Line No.	Customer Class	Proposed Revenue Increase (000's)	3/1/2026 Present Rates ($/kWh)	1/1/2029 Proposed Rates ($/kWh)	Percentage Change Compared to Present Rates	Line No.
	Bundled Service*					
1	Residential	$ 54,183	$ 0.32341	$ 0.32866	1.62%	1
2	CARE	$ 15,672	$ 0.21799	$ 0.22183	1.76%	2
3	Non-CARE	$ 38,510	$ 0.39253	$ 0.39871	1.58%	3
4	Small Commercial	$ 14,142	$ 0.40532	$ 0.41192	1.63%	4
5	Medium Commercial	$ 9,879	$ 0.35462	$ 0.35939	1.35%	5
6	Large Commercial	$ 13,492	$ 0.31167	$ 0.31575	1.31%	6
7	Streetlights	$ 416	$ 0.43017	$ 0.43499	1.12%	7
8	Standby	$ 596	$ 0.15016	$ 0.15148	0.88%	8
9	Agriculture	$ 22,817	$ 0.38335	$ 0.38952	1.61%	9
10	Industrial	$ 5,081	$ 0.21616	$ 0.21803	0.87%	10
11	Total	$ 120,605	$ 0.32597	$ 0.33084	1.49%	11
	Direct Access and Community Choice Aggregation Service**					
12	Residential	$ 93,813	$ 0.28161	$ 0.28739	2.05%	12
13	Small Commercial	$ 34,030	$ 0.32441	$ 0.33100	2.03%	13
14	Medium Commercial	$ 22,669	$ 0.26081	$ 0.26545	1.78%	14
15	Large Commercial	$ 41,861	$ 0.21439	$ 0.21813	1.74%	15
16	Streetlights	$ 741	$ 0.32345	$ 0.32826	1.49%	16
17	Standby	$ 186	$ 0.15675	$ 0.15851	1.12%	17
18	Agriculture	$ 8,342	$ 0.27213	$ 0.27747	1.97%	18
19	Industrial	$ 21,324	$ 0.13719	$ 0.13908	1.38%	19
20	Total	$ 222,966	$ 0.23639	$ 0.24080	1.86%	20
	Departing Load***					
21	Residential	$ 1		$ 0		21
22	Small Commercial	$ 3		$ 0		22
23	Medium Commercial	$ 17		$ 0		23
24	Large Commercial	$ 25		$ 0		24
25	Streetlights	$ (0.0)		$ (0.0)		25
24	Standby	$ -			0.00%	24
25	Agriculture	$ 7		$ 0		25
26	Industrial	$ 369		$ 0		26

* Customers who receive electric generation as well as transmission and distribution service from PG&E.

** Customers who purchase energy from non-PG&E suppliers.

*** Customers who purchase their electricity from a non-utility supplier and receive transmission and distribution service from a publicly owned utility or municipality. A rate comparison cannot be provided for Departed Load as the applicable rates vary by specific departed load customer categories and any average rate that could be derived, would not be representative of any particular departed load category.

Illustrative Electric Bill Impacts for Average Residential Customer (500 kWh) - Bundled Service
Propel/Elevate Filing

Line No.	Customer Class	3/1/2026 Present Bill ($)	1/1/2029 Proposed Bill ($)	Bill Change	Bill Percentage Change
	Illustrative Bill Impacts*				
	Residential				
1	CARE	$ 111.39	$113.33	$ 1.94	1.74%
2	Non-CARE	$ 197.51	$200.61	$ 3.10	1.57%

* Average Bundled customer using an annual monthly average of 500 kWh (includes average monthly climate credit).

PACIFIC GAS AND ELECTRIC COMPANY
Class Average Bundled and Transportation/PPPS Rates ($/th) (Illustrative)
Propel and Elevate Application

Line No.	Customer Class	Present March 1, 2026	Proposed 2029	$ Change	% Change
	BUNDLED—RETAIL CORE*				
1	Residential Non-CARE	$2.792	$2.845	$0.053	1.9%
2	Residential CARE	$2.211	$2.254	$0.043	1.9%
3	Small Commercial Non-CARE	$1.948	$1.979	$0.031	1.6%
4	Large Commercial	$1.316	$1.332	$0.015	1.2%
5	Uncompressed Core NGV	$1.326	$1.343	$0.017	1.3%
6	Compressed Core NGV	$3.007	$3.072	$0.065	2.2%
	TRANSPORT ONLY—RETAIL CORE				
7	Residential Non-CARE	$2.284	$2.337	$0.053	2.3%
8	Residential CARE	$1.703	$1.746	$0.043	2.5%
9	Small Commercial Non-CARE	$1.484	$1.515	$0.031	2.1%
10	Large Commercial	$0.896	$0.912	$0.015	1.7%
11	Uncompressed Core NGV	$0.911	$0.928	$0.017	1.8%
12	Compressed Core NGV	$2.592	$2.657	$0.065	2.5%
	TRANSPORT ONLY—RETAIL NONCORE (NONCOVERED ENTITIES)				
13	Industrial – Distribution	$0.739	$0.758	$0.019	2.6%
14	Industrial – Transmission	$0.406	$0.414	$0.008	2.1%
15	Industrial – Backbone	$0.192	$0.193	$0.001	0.5%
16	Uncompressed Noncore NGV – Distribution	$0.659	$0.678	$0.019	2.9%
17	Uncompressed Noncore NGV – Transmission	$0.378	$0.387	$0.008	2.1%
18	Electric Generation – Distribution/Transmission	$0.345	$0.354	$0.008	2.4%
19	Electric Generation – Backbone	$0.140	$0.141	$0.001	0.8%
	TRANSPORT ONLY—RETAIL NONCORE (COVERED ENTITIES)				
20	Industrial – Distribution	$0.653	$0.672	$0.019	3.0%
21	Industrial – Transmission	$0.320	$0.328	$0.008	2.6%
22	Industrial – Backbone	$0.106	$0.107	$0.001	0.9%
23	Uncompressed Noncore NGV – Distribution	$0.573	$0.592	$0.019	3.4%
24	Uncompressed Noncore NGV – Transmission	$0.293	$0.301	$0.008	2.8%
25	Electric Generation – Distribution/Transmission	$0.259	$0.268	$0.008	3.1%
26	Electric Generation – Backbone	$0.054	$0.055	$0.001	2.0%
	TRANSPORT ONLY—WHOLESALE				
27	Alpine Natural Gas (T)	$0.263	$0.271	$0.008	3.1%
28	Coalinga (T)	$0.265	$0.273	$0.008	3.0%
29	Island Energy (T)	$0.285	$0.293	$0.008	2.8%
30	Palo Alto (T)	$0.258	$0.266	$0.008	3.1%
31	West Coast Gas – Castle (D)	$0.580	$0.600	$0.020	3.5%
32	West Coast Gas – Mather (D)	$0.796	$0.825	$0.029	3.6%
33	West Coast Gas – Mather (T)	$0.267	$0.275	$0.008	3.0%
	ILLUSTRATIVE BILL IMPACTS				
	Average Annual Monthly Usage (therms) for Non-CARE Bundled Residential Customer based on proposed sales forecast	31	31	$0.000	0.0%
	Average Bundled Non-CARE Residential Customer bill (includes average monthly climate credit)	$82.69	$84.35	$1.657	2.0%

* Bundled rates incorporate an illustrative procurement revenue requirement and will not match rates as filed in PG&E's Core Monthly Pricing Advice Letters.

(1) CARE Customers receive a 20% discount off of PG&E's total bundled rate and are exempt from the CARE portion of PG&E's

(2) Transportation rates paid by all customers include an additional GHG Compliance and Operational Cost Recovery component of $0.0859 per therm.

(3) Covered Entities (i.e.customers that currently have a direct obligation to pay for allowances directly to the Air Resources Board) will pay a GHG Operational Cost Recovery component of $-0.00005 per therm to cover PG&E allowance costs associated with lost & unaccounted for (LUAF) gas and compression costs. Covered entities will see a line item credit on their bill equal to the GHG Compliance Cost of $0.08595 ($0.0859 minus $-0.00005) per therm times their monthly billed volumes.

ATTACHMENT D

SERVICE OF NOTICE OF APPLICATION

In accordance with Rule 3.2(b), Applicant will mail a notice to the following, stating in general terms its proposed change in rates.

State of California

To the Attorney General and the Department of General Services.

State of California
Office of Attorney General
1300 I St Ste 1101
Sacramento, CA 95814

and

Director of General Services
State of California
707 3rd St
West Sacramento, CA 95605

Counties

To the County Counsel or District Attorney and the County Clerk in the following counties:

Alameda
Alpine
Amador
Butte
Calaveras
Colusa
Contra Costa
El Dorado
Fresno
Glenn
Humboldt
Kern
Kings
Lake
Lassen
Madera
Marin
Mariposa
Mendocino
Merced
Modoc
Monterey
Napa
Nevada
Placer
Plumas
Sacramento
San Benito
San Bernardino
San Francisco
San Joaquin
San Luis Obispo
San Mateo
Santa Barbara
Santa Clara
Santa Cruz
Shasta
Sierra
Siskiyou
Solano
Sonoma
Stanislaus
Sutter
Tehama
Trinity
Tulare
Tuolumne
Yolo
Yuba

Municipal Corporations

To the City Attorney and the City Clerk of the following municipal corporations:

Alameda
Albany
Amador City
American Canyon
Anderson
Angels Camp
Antioch
Arcata
Arroyo Grande
Arvin
Atascadero
Atherton
Atwater
Auburn
Avenal
Bakersfield
Barstow
Belmont
Belvedere
Benicia
Berkeley
Biggs
Blue Lake
Brentwood
Brisbane
Buellton
Burlingame
Calistoga
Campbell
Capitola
Carmel
Ceres
Chico
Chowchilla
Citrus Heights
Clayton
Clearlake
Cloverdale
Clovis
Coalinga
Colfax
Colma
Colusa
Concord
Corcoran
Corning
Corte Madera
Cotati
Cupertino
Daly City
Danville
Davis
Del Rey Oakes
Dinuba
Dixon
Dos Palos
Dublin
East Palo Alto
El Cerrito
Elk Grove
Emeryville
Escalon
Eureka
Fairfax
Fairfield
Ferndale
Firebaugh
Folsom
Fort Bragg
Fortuna
Foster City
Fowler
Fremont
Fresno
Galt
Gilroy
Gonzales
Grass Valley
Greenfield
Gridley
Grover Beach
Guadalupe
Gustine
Half Moon Bay
Hanford
Hayward
Healdsburg
Hercules
Hillsborough
Hollister
Hughson
Huron
Ione
Isleton
Jackson
Kerman
King City
Kingsburg
Lafayette
Lakeport
Larkspur
Lathrop
Lemoore
Lincoln
Live Oak
Livermore
Livingston
Lodi
Lompoc
Loomis
Los Altos
Los Altos Hills
Los Banos
Los Gatos
Madera
Manteca
Maricopa
Marina
Mariposa
Martinez
Marysville
McFarland
Mendota
Menlo Park
Merced
Mill Valley

Millbrae
Milpitas
Modesto
Monte Sereno
Monterey
Moraga
Morgan Hill
Morro Bay
Mountain View
Napa
Newark
Nevada City
Newman
Novato
Oakdale
Oakland
Oakley
Orange Cove
Orinda
Orland
Oroville
Pacific Grove
Pacifica
Palo Alto
Paradise
Parlier
Paso Robles
Patterson
Petaluma
Piedmont
Pinole
Pismo Beach
Pittsburg
Placerville
Pleasant Hill
Pleasanton
Plymouth
Point Arena
Portola
Portola Valley
Rancho Cordova
Red Bluff
Redding
Redwood City
Reedley
Richmond
Ridgecrest
Rio Dell
Rio Vista
Ripon
Riverbank
Rocklin
Rohnert Park
Roseville
Ross
Sacramento
Saint Helena
Salinas
San Anselmo
San Bruno
San Carlos
San Francisco
San Joaquin
San Jose
San Juan Bautista
San Leandro
San Luis Obispo
San Mateo
San Pablo
San Rafael
San Ramon
Sand City
Sanger
Santa Clara
Santa Cruz
Santa Maria
Santa Rosa
Saratoga
Sausalito
Scotts Valley
Seaside
Sebastopol
Selma
Shafter
Shasta Lake
Soledad
Solvang
Sonoma
Sonora
South San Francisco
Stockton
Suisun City
Sunnyvale
Sutter Creek
Taft
Tehama
Tiburon
Tracy
Trinidad
Turlock
Ukiah
Union City
Vacaville
Vallejo
Victorville
Walnut Creek
Wasco
Waterford
Watsonville
West Sacramento
Wheatland
Williams
Willits
Willows
Windsor
Winters
Woodland
Woodside
Yountville
Yuba City