BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Application of Pacific Gas and Electric Company for Adoption of Electric Revenue Requirements and Rates Associated with its 2027 Energy Resource Recovery Account (ERRA) and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation (U 39 E)	Application 26-05-007

COMMENTS OF THE PUBLIC ADVOCATES OFFICE ON PACIFIC GAS AND ELECTRIC COMPANY'S FALL UPDATE TESTIMONY

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I. INTRODUCTION AND SUMMARY OF RECOMMENDATIONS

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits these comments on Pacific Gas and Electric Company's (PG&E) Fall Update to its 2027 Energy Resource Recovery Account (ERRA) forecast pursuant to the Assigned Commissioner's Scoping Memo and Ruling, issued on August 3, 2026 (Scoping Memo).[1]

The Commission should require PG&E to provide certain minimum information in future ERRA forecast applications to support its load forecast of data centers. In its Fall Update, PG&E fails to meet its burden of showing how its data center load forecast assumptions, and the rates that follow from those assumptions, are just and reasonable.[2] To ensure PG&E provides sufficient detail in future data center load forecasts, the Commission should require PG&E to provide the following information, at a minimum:

1. A clear definition of data centers and a justification for how it selects the data used to develop its data center load forecast;

   and

2. A comprehensive analysis of historical data center performance used to assume future performance.

II. BACKGROUND

Starting in the 2026 ERRA Application cycle, PG&E provided its methods for forecasting "large data centers" as a separate category.[3] PG&E has seen an unprecedented number of energization applications from data center customers. Within a one-year period between December 2024 to December 2025, PG&E's data center applications and inquiries for requested capacity grew from approximately 8,000

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[1] Application (A.) 26-05-007, 2027 Energy Resource Recovery Account and Generation Non Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation PG&E-5 Testimony (PG&E-5), at 7, line 18, to 9, line 7.

[2] PG&E-5, at 7, line 18, to 9, line 7.

[3] PG&E, 2026 Energy Resource Recovery Account and Generation Non Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation Prepared Testimony Public Version (PG&E-1), May 15, 2025, at 2-11, lines 14-15, "New as of this year, PG&E is explicitly incorporating the impacts of new large data centers expected in its service territory."

Megawatt (MW) to 10,000 MW.[4] In the same time period, its queue containing signed agreements, active applications, and inquiries for requested capacity grew from 8,000 MW to 15,000 MW.[5] Forecasting data center growth accurately will be increasingly important over the next decade as applications in the queue mature.

Much of the interest in PG&E's application queue comes from data centers with high requested capacities. As of June this year, PG&E claims that it has at least 53 data centers in its pipeline, totaling 12,710 MW worth of capacity, that are in the application, final engineering or construction phases.[6] This is equivalent to an average of approximately 240 MW requested per data center.[7]

Overestimating data center load growth can lead to over-procurement of energy, while underestimating could lead to reliability and market challenges. Rates are set to recover a utility's revenue requirement over its forecasted volume of customer load, so overestimating load can result in setting rates too low while underestimating load can result in setting rates too high. Setting rates too low can result in rate increases in the future to recover a utility's undercollection. On the other hand, underestimating load may result in utilities under-procuring generation and capacity resources. Under-

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[4] "Requested capacity" refers to the capacity, in Megawatt (MW) or kilowatt (kW) units of power that the customer requests in their data center application. The "requested capacity" should be at or higher than the peak demand the customer expects to have. For PG&E's data center application queue figures see CalAdv-07, California Energy Commission (CEC), Adopted 2025 Integrated Energy Policy Report, Adopted July 8, 2026, Figure 13, at 52, available at https://www.energy.ca.gov/publications/2026/2025-integrated-energy-policy-report.

[5] CalAdv-07.

[6] In a presentation to the California Energy Commission, PG&E provides the following categories for its data center pipeline: 1) Application & Preliminary Engineering, 2) Final Engineering, 3) Interconnection Construction Agreement, and 4) Construction. PG&E states that as of June 30, 2026, it has 23 data center projects and 8,200 MW of data centers in the "Application & Preliminary Engineering" phase, meaning data centers with a "received and signed" application and a paid Preliminary Engineering Study (PES). In addition, PG&E has 23 data center projects, making up 3,880 MW in the Final Engineering phase, meaning projects that have a signed Work Performance Agreement (WPA) and paid WPA payment. In the Interconnection Construction Agreement category, PG&E claims it had 4 projects, making up 4 projects. Finally, PG&E states it has 140 MW of data centers under construction but did not specify the number of data centers present in this category. See CalAdv-08, Conde, Jenny, PG&E Data Center Forecasting, August 20, 2026, TN #272065, published on CEC Docket No. 26-IEPR-03 on August 20, 2026, at 8, available at https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=26-IEPR-03.

[7] 12,710 MW / 53 data centers = approximately 240 MW per data center.

procurement of resources negatively impacts reliability and may require utilities to procure energy in short-term markets which increases exposure to higher-risk short-term energy prices. Given the potential ratepayer impacts of load forecast errors, PG&E's steps to arrive at assumptions regarding data center load growth should be transparent so that the Commission and stakeholders can review and analyze the assumptions.

Small changes in assumptions could lead to big changes in final forecasts. For example, applying a 90% capacity materialization rate[8] and 85% capacity utilization rate[9] to PG&E's 12,710 MW of current data center projects[10] would lead to a forecasted peak demand of 9,723 MW. If instead, PG&E assumes an 85% capacity materialization rate and 80% capacity utilization rate, the expected peak demand from data center load would lead to a total forecasted peak demand of 8,643 MW. If in the first scenario, PG&E assumes a load factor[11] of 80%, the annual energy consumption would be 68,139 GWh.[12] In the second scenario, applying a 70% load factor instead of 80% would lead to an energy consumption estimate of 52,998 GWh.[13] In these two scenarios, changing the capacity materialization rate, capacity utilization rate, and load factor by 5%, 5%, and

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[8] See CalAdv-04, PG&E Response to Cal Advocates Data Request, No. 002, Question 4a, received on October 16, 2026, at 1, "…the 90 percent materialization rate refers to the assumed proportion of capacity that is ultimately energized."

[9] PG&E defines "capacity utilization rate" as "peak demand divided by materialized capacity." See CalAdv-06, PG&E Response to Cal Advocates Data Request No. 002, Question 6a, received on October 16, 2026, at 1.

[10] Based on PG&E's stated data center pipeline numbers. See CalAdv-08, at 8.

[11] PG&E defines "load factor" as "a measure of average demand compared to peak demand (over the same time frame). That is, it is calculated as average demand divided by peak demand." See CalAdv-02, PG&E Response to Cal Advocates Data Request, No. 002, Question 2b, received on October 16, 2026, at 3.

[12] 9,723 MW peak demand * 0.80 = 7,778.4 MW of average demand. 7,778.4 MW * 8760 hours/year * 1 GWh / 1000 MWh = 68,138.78 GWh/year. Note that this figure is illustrative and does not take into account the timing of when data centers get energized or the ramping of capacity provided by PG&E. For instance, if some of PG&E's data center capacity matures in 2027 and some in 2028, the total energy consumption in 2028 would result from both data centers that get energized in 2027 and 2028. In 2029, the total energy consumption from data centers in that year would be from data centers that are energized in 2027, 2028, and 2029, assuming data centers maintain the same level of energy consumption year over year. The 68,139 GWh figure here assumes that all of PG&E's data center pipeline materializes with the listed assumptions in one year and not spread over multiple years.

[13] 8,643 MW peak demand * 0.70 = 6.050.1 MW of average demand. 6,050.1 MW * 8760 hours/year * 1 GWh / 1000 MWh = 52,998.88 GWh/year.

10%, respectively would reduce the final energy consumption estimate by 22% or 15,141 GWh[14], equivalent to the amount of energy needed to power 3 million households annually.[15] Unfortunately, PG&E does not sufficiently disclose its reasoning behind the various input assumptions it applied when developing its forecast. PG&E, therefore, fails to show that its assumptions are just and reasonable.

In developing the load forecast for the 2027 ERRA Application, PG&E separates data centers into two groups: 1) "large data centers," or "data centers in the large commercial/industrial customer class" (Large C&I)[16] and 2) data centers in the "small or medium commercial and industrial revenue class."[17] PG&E only forecasts and applies a separate post-regression forecast adjustment for "large data centers."[18] Other data centers are grouped with existing "small and medium commercial load in PG&E's small and medium commercial regression model."[19] Table 1 provides a summary of PG&E's large data center load forecast assumptions in its May Filing and the Fall Update. As discussed further below, PG&E provided insufficient justification for the reasonableness of its data center forecasting assumptions. In adopting these assumptions, PG&E fails to clearly

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[14] The 15,141 GWh difference is illustrative and assumes that all of PG&E's data center pipeline capacity materializes in one year and holds such annual energy consumption year over year, which is not the case due to the time it takes for PG&E to provide the capacity requested. See footnote 12 for more discussion regarding the additive nature of energy consumption.

[15] PG&E's recorded 2025 residential sales totaled 24,542,916 MWh or 24,543 GWh. In the same year, PG&E's service territory consists of an estimated 5,070,000 households. The average amount of energy consumption for one household is = 24,543 GWh / 5,070,000 households = 0.00484 GWh annually. 15,141 GWh / 0.00484 GWh per household = 3,128,305 households. For PG&E's recorded 2025 residential sales, *see* CalAdv-9, A.26-05-007, 2027 Energy Resource Recovery Account and Generation Non Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation, Public Workpaper titled *02.ERRA 2027-Forecast_WP_PGE_20260325_Ch02_2-3_Sales_PUB,* "Annual Sales" Tab. For PG&E's 2025 household estimate, *see* CalAdv-10, CEC, California Energy Demand (CED) Forecast – PG&E, 2025-2045 Baseline 'Mid Forecast," Form 2.2: Economic and Demographic Assumptions," January 2026, available at https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report-iepr/2025-integrated-energy-policy-report-0.

[16] PG&E-1, at 2-11, lines 8-10, "The forecast scope is limited to data centers in the large commercial/industrial customer class that are expected to take electric distribution or transmission service from PG&E."

[17] See CalAdv-01, PG&E Response to Cal Advocates Data Request No. 002, Question 1d, at 3.

[18] CalAdv-01, Question 1d, at 3.

[19] CalAdv-01, Question 1d, at 3.

define "large data centers" on which to base assumptions and analyzes a select group of data centers that do not represent all large data centers in its customer base.

Table 1: Summary of PG&E's Large Data Centers Forecasting Assumptions

Assumption	PG&E's Definition	Rate – May 15 filing	Rate – Fall Update
Application Materialization Rate	Number of applications that proceed to energization divided by total number of applications[20]	None provided[21]	
Capacity Materialization Rate	Proportion of requested capacity that is ultimately energized[22]	90%[23]	100% for projects already energized or under construction[24]; 90% for all other projects in scope for 2027[25]
Capacity Utilization Rate	Real peak demand divided by energized capacity[26]	85%[27]	49%[28]
Load Factor	Average demand divided by peak demand[29]	88%[30]	84%[31]

[20] Definition provided by Cal Advocates.

[21] PG&E does not mention any application materialization rate assumption in the May filing or the Fall Update. See PG&E-1, at 2-11, starting on line 4, to 2-13, line 9; and PG&E-5, at 7, starting on line 18, to 9, line 7, "Data Center Forecast Update" section.

[22] See CalAdv-04, Question 4a, at 1, "…the 90 percent materialization rate refers to the assumed proportion of capacity that is ultimately energized."

[23] PG&E-1, at 2-11, line 30.

[24] PG&E-5, at 7, lines 32-34, and at 8, lines 1-5.

[25] PG&E-5, at 7, lines 32-34, and at 8, lines 1-5.

[26] See CalAdv-06, Question 6a, received on October 16, 2026, at 1.

[27] PG&E-1, at 2-11, line 1.

[28] PG&E-5, at 9, line 6.

[29] See CalAdv-02, Question 2b, at 3, "Load factor is a measure of average demand compared to peak demand (over the same time frame). That is, it is calculated as average demand divided by peak demand."

[30] PG&E-5, at 2-11, line 15.

[31] PG&E-5, at 9, line 7.

III. DISCUSSION OF RECOMMENDATIONS

PG&E's Fall Update fails to provide information necessary to determine whether its forecast is reasonable. Specifically, PG&E has not met its burden of showing that its assumptions related to the threshold for "large data centers" and how it uses historical performance to determine assumptions for future data centers' characteristics, along with the resulting rate impacts are just and reasonable. These omissions could result in outsized impacts on the load forecast, as described in further detail above, and the resulting costs borne by ratepayers.

A. In Future Applications, PG&E Should Provide a Clear Definition of Data Centers Used to Ground Assumptions

In future ERRA applications, the Commission should require PG&E to provide a consistent and clear definition of data centers used to ground assumptions. First, PG&E's definition of "large data centers" as "data centers in the large commercial/industrial customer class" still leaves open the question of exactly what type(s) of facility constitutes a data center.[32] PG&E states that "at no point in the inquiry or energization process does PG&E conduct a formal analysis and make a formal determination regarding whether a facility is a 'data center.'"[33] PG&E thus has no standardized process for determining whether a facility is a data center, but rather relies on a mix of inputs, which does not ensure that the categorization is consistent. For instance, it is unclear if PG&E would consider one data center campus with the same street address but different unit numbers or different service agreements as one or multiple data centers.

Second, PG&E does not provide sufficient information on how it categorizes data centers into the "large commercial/industrial customer class," (Large C&I) thereby fitting certain data centers into its "large data centers" definition.[34] PG&E does not provide any criteria, either regarding the voltage class or any other information it uses to categorize data centers into the Large C&I customer class. PG&E does not categorize facilities into

[32] CalAdv-01, Question 1a, at 2.

[33] CalAdv-01, Question 1a, at 2.

[34] PG&E-1, at 2-11, lines 8-10.

the Large C&I customer class based on rate schedule alone. For example, PG&E does not consider all data centers eligible for its B-20 and E-20 rate schedules, which have the highest eligibility threshold of 1000 kilowatts or more in peak demand, as "large data centers."[35] PG&E considers around 72 current data centers with peak demand between 21 MW and 28 MW to be in the "small or medium commercial and industrial revenue class."[36] PG&E must then use other criteria to determine if a data center is in the Large C&I class, such as voltage class or other information. However, it does not disclose this information in its Fall Update,[37] which leads to potential inconsistency.

Stakeholders to the ERRA proceeding cannot determine the reasonableness of PG&E's data center load forecast assumptions without information regarding how PG&E defines "large data centers". This information is necessary to analyze historical performance and ground assumptions. If PG&E were to use assumptions from a set of current facilities that have a higher capacity utilization rate or load factor than average and apply these assumptions to future data centers, its forecast could be inflated. The Commission should direct PG&E to use a consistent, specific, and clear definition of data centers for the post-regression adjustment and base assumptions of future data center performance on all historical data center performance that meet such definition in its future applications.[38] For both data center applicants and current data center customers,

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[35] PG&E, Electric Schedule B-20 Service to Customers with Maximum Demands of 1000 Kilowatts or More (Electric Schedule B-20), effective March 8, 2024, at 1, accessible at https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_SCHEDS_B-20.pdf; PG&E, Electric Schedule E-20 Service to Customers with Maximum Demands of 1000 Kilowatts or More (Electric Schedule E-20), effective July 8, 2021, at 1, accessible at https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_SCHEDS_E-20.pdf.

[36] CalAdv-01, Question 1d, at 3.

[37] Rate schedules B-20 and E-20 define three voltage classes: transmission, primary, or secondary. See PG&E Electric Schedule B-20, at 14; PG&E Electric Schedule E-20, at 10.

[38] A reasonable "large data center" definition should define the threshold for a customer's expected peak demand, voltage class, and any other information that allows stakeholders to verify PG&E's adoption of this definition for purposes of a) its analysis of historical data center performance and b) assumptions for future performance.

the peak demand cutoff should be based on the customer's initial-requested capacity (expected peak demand) to ensure consistent comparison.[39]

B. PG&E Should Base Assumptions of Future Data Center Performance on Comprehensive Historical Performance When Feasible

In PG&E's future data center load forecasts, the Commission should require PG&E to base its assumptions of future data center performance on historical performance of data centers in PG&E's territory that are as comprehensive as possible. PG&E's forecasting assumptions in its Fall Update for application materialization rate and capacity utilization rate are not based on representative, historical data center performance in its territory. PG&E assumes a 100% capacity materialization rate for "projects already energized or under construction" and a 90% capacity materialization rate for all other projects in scope for 2027.[40] PG&E states that these rates are based on "PG&E subject matter experts' judgment," not on any historical records.[41] PG&E also does not provide any justification that this capacity materialization rate is reasonable for any group of data centers. PG&E states that it "does not have a process for collecting all of the data necessary to comprehensively calculate historical capacity materialization rate of the data centers on its system."[42] PG&E claims for its inability to compile this data

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[39] Consider, for instance, that the cutoff for "large data centers" for which PG&E would conduct a post-regression adjustment is 20 MW. If a data center applicant, Customer A requests a capacity of 25 MW (meaning they expected their peak demand to be around 25 MW), Customer A would fit this definition. If current data center customer, Customer B, in the past also requested a capacity of 25 MW, but whose actual peak demand is only 10 MW, Customer B would not fit this definition and be eliminated from the historical performance analysis. This would lead PG&E to exclude the analysis of some customers with low peak demand in its current data centers group, even though they might have originally requested a capacity above the threshold. PG&E would not be comparing apples to apples in this scenario. For its post-regression adjustment, PG&E should define "large data centers" based on requested capacity, both for current customers and applicants. This would ensure that PG&E compares *all* customers that claim to have a high peak demand in their applications with each other.

[40] PG&E-5, at 7, lines 32-34, and at 8, lines 1-5.

[41] PG&E-5, at 7, lines 5-8, "As stated in the Prepared Testimony, this 90 percent [capacity materialization rate] is based on PG&E subject matter experts' judgement and reflects some uncertainty that projects do indeed materialize and do so fully by the forecasted operative date (OPDAT)."

[42] See CalAdv-03, PG&E Response to Cal Advocates Data Request No. 002, Question 3, at 1.

results from its not having a process for doing so.[43] Since the capacity materialization rate is the requested capacity divided by the capacity ultimately provided by PG&E, and PG&E possesses all of the relevant information to conduct this analysis, the Commission should require PG&E to produce the historical capacity materialization rate from all of its data center customers in the same category of the ones it is applying a post-regression adjustment, and uses this historical rate to justify its assumption for incoming data centers in future ERRA applications.

In addition, PG&E bases its 49% capacity utilization assumption on the performance of merely 6 data centers during less than a calendar year."[44] And, while the average capacity utilization rate for these six data centers between January-August 2025 is 42%.[45] PG&E provides no explanation on how PG&E arrives at its "assumed" 49% capacity utilization rate[46] PG&E itself states that this analysis "is not comprehensive of all large data centers currently on PG&E's system, as PG&E does not have comprehensive capacity data for large data centers already online."[47]

PG&E does not explain why it has not developed comprehensive analysis of capacity utilization rate data for large data centers that are currently online. This is unreasonable given the importance of accurate data center forecasting. Nor does PG&E explain why it chose January-August 2025, or only 8 months of data for its analysis of capacity utilization. As stated by PG&E in a presentation to the California Energy

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[43] CalAdv-03, at 1, "[A calculation of historical capacity materialization rate] would require comprehensive capacity data on all data center applications ever received, including all those that have withdrawn and – in the case of materialized projects – including revised capacity data. PG&E does not have a process for collecting all of the data necessary to comprehensively calculate historical capacity materialization rates of the data centers on its system."

[44] CalAdv-02, Question 2c(i), at 3, "for the purposes of this question, the new capacity utilization assumption was based on analysis of January-August 2025 data of six large data centers, while the new load factor assumption was based on analysis of January-November 2025 data of thirty-nine large data centers."

[45] See CalAdv-05C, PG&E Response to Cal Advocates Data Request 02, Question 5, Attachment *ERRA-2027-PGE-Forecast_DR_CalAdvocates_002-Q005c_Atch01_CONF*, received on October 16, at 3.

[46] See CalAdv-05, PG&E Response to Cal Advocates Data Request 02, Question 5c(ii)4, received on October 16, at 3.

[47] CalAdv-05, at 3.

Commission, "data center electricity demand depends largely on cooling loads," and thus depends on ambient temperatures and seasonal fluctuations.[48] It is only reasonable to expect that PG&E would base its assumptions on the performance of as many applicable data points as are available, and use at least one if not multiple years, of performance data to capture the wide range of independent variables. The Commission should direct PG&E to utilize these further data points when developing its data center load forecasts.

Furthermore, PG&E states that it developed the new load factor assumption of 84% based on analysis of January-November 2025 data of 39 large data centers.[49] However, PG&E does not provide primary data shows the performance of the 39 large data centers. PG&E states that "it has developed a database to track the load of known data centers on its system," and the database "has monthly usage data back to 2010 and hourly usage data back to 2016"[50] of around 120 data centers.[51] Despite this abundant data, PG&E instead chooses to base its load factor assumption on a single 11-month interval, and provides no explanation for why this time interval is appropriate or representative of future data center performance. Since load factor is calculated as average demand divided by peak demand, the database mentioned previously contains enough information for PG&E to perform this analysis. It is also unclear whether the 39 data centers PG&E evaluated for this assumption makes up all of the "large data centers" in PG&E's territory, or only a subset. Given the uncertainty regarding data center load, the Commission should require PG&E's future ERRA applications to include data center

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[48] See CalAdv-11, Jenny Conde, PG&E Data Center Forecasting, July 16, 2025, TN #264914, published on CEC Docket No. 25-IEPR-03 on July 18, 2025, at 10, available at https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=25-IEPR-03.

[49] CalAdv-02, Question 2c(i)1a, at 3, "the new load factor assumption was based on analysis of January-November 2025 data of thirty-nine large data centers."

[50] CalAdv-02, Question 2c, at 3, "PG&E has developed a database to track the load of known data centers on its system… The database has monthly usage data back to 2010 and hourly usage data back to 2016. However, for the purposes of this question, the new capacity utilization assumption was based on analysis of January-August 2025 data of six large data centers, while the new load factor assumption was based on analysis of January-November 2025 data of thirty-nine large data centers."

[51] CalAdv-08, at 5, "PG&E's data center database tracks the load of existing data centers on PG&E's system… composed of ~120 data centers."

load forecasting assumptions that are based on a comprehensive, verifiable analysis of historical performance.

IV. CONCLUSION

For the reasons stated above, Cal Advocates respectfully requests the Commission order PG&E to 1) provide a clear definition of data centers and a justification for how it selects the data used to develop its data center load forecast; and 2) provide a comprehensive analysis of historical data center performance used to assume future performance.

Respectfully submitted,

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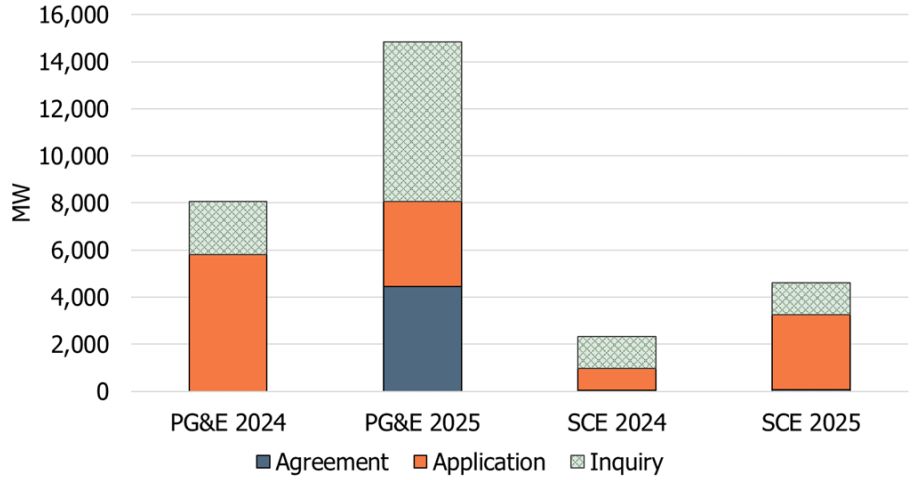
November 4, 2026

APPENDIX A

ADDITIONAL EXHIBITS

CalAdv-07: Figure 13 from California Energy Commission (CEC)'s Adopted 2025 Integrated Energy Policy Report

Figure 13: Data Center Capacity Requests for PG&E and SCE Territories as of December 2025



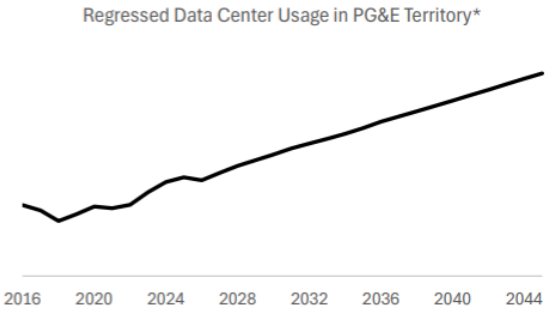
Source: CEC with data from the utilities.

CalAdv-08: Conde, J., PG&E Data Center Forecasting, August 20, 2026, TN #272065, published on CEC Docket No. 26-IEPR-03 on August 20, 2026, slide 5

Regression-Based Forecast Component

PG&E's database on existing data centers has enabled the development of a regression-based forecast that complements the pipeline-based forecast.

- PG&E's data center database tracks the load of existing data centers on PG&E's system
  - Composed of ~120 data centers
- Regression model developed using ~10 years of monthly load data
- Load from interconnection queue is added as incremental to 2025 to avoid double counting with regression results



* Vertical axis values not shown due to customer privacy considerations. Vertical axis does not start at 0

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CalAdv-08: Conde, J., PG&E Data Center Forecasting, August 20, 2026, TN #272065, published on CEC Docket No. 26-IEPR-03 on August 20, 2026, slide 8.

Data Center Pipeline

The data center pipeline increased by almost 8 GW between March and June 2026, which reflects new projects received in the 2026 Cluster Study. PG&E anticipates reflecting updated definition of Final Engineering in future forecast vintages.

Data Center Pipeline

MWs	March 2026	June 2026
Total	**5,090**	**12,710**
Application & Preliminary Engineering	1,700	8,200
Final Engineering	3,110	3,880
Interconnection Construction Agreement	140	490
Construction	140	140

- New definition for Final Engineering (from signed PES to signed WPA) reflects higher financial commitment from the customer

Pipeline table and highlights from PG&E Corporation's 2026 Second Quarter Earnings

Pipeline Highlights

- Application received and signed
- Preliminary Engineering Study (PES) fee paid
- 26 projects as of 6/30/26

- Work Performance Agreement (WPA) signed
- WPA payment received covering design activities and procurement
- 23 projects as of 6/30/26

- Interconnection Construction Agreement executed
- 4 projects as of 6/30/26

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CalAdv-09: A.26-05-007, 2027 Energy Resource Recovery Account and Generation Non Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation, PG&E Public Workpaper titled *02.ERRA 2027-Forecast_WP_PGE_20260325_Ch02_2-3_Sales_PUB*, "Annual Sales" Tab.

2027 Spring ERRA
Adjusted for EE, DG, EV and Electrification. Community Choice Aggregation includes existing, expanding and committed CCAs

PACIFIC GAS AND ELECTRIC COMPANY
ELECTRIC DEPARTMENT
COMPANY SALES AND LOADS
(MWH)

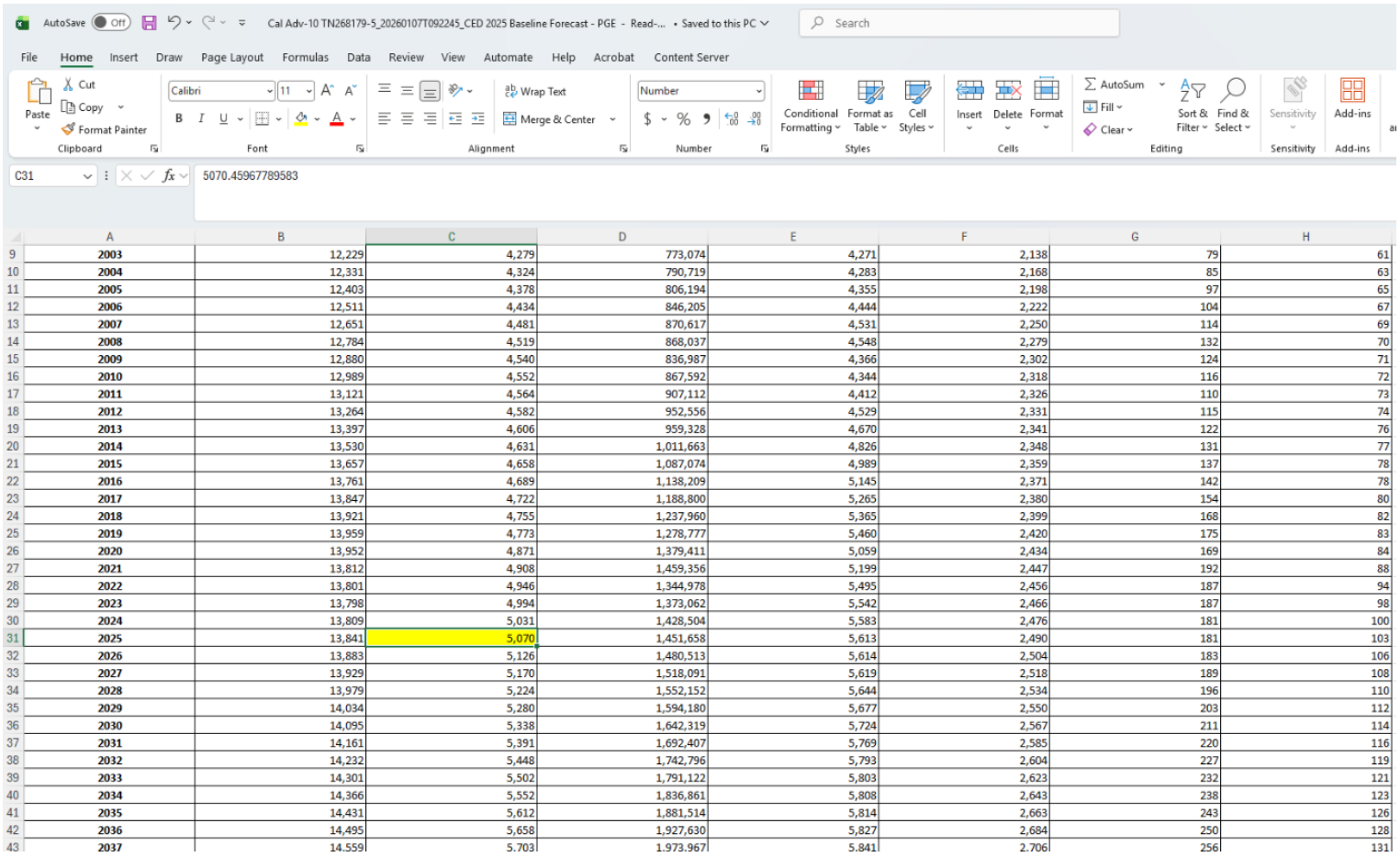
Recorded Embedded Data from RDA Elecfix

	2025	2026	2027
PG&E SALES AND LOADS:			
RESIDENTIAL:			
INDIVIDUAL	23,987,968	[redacted]	
MASTER METER	554,948		
TOTAL	24,542,916		
LIGHT AND POWER:			
SMALL	6,880,904		
MEDIUM	20,942,583		
TOTAL	27,823,486		
LARGE LIGHT AND POWER:	13,478,223		
PUBLIC AUTHORITY:	16.40		
AGRICULTURE	4,978,454		
STREET LIGHTING	267,490		
RAILWAY	365,338		
RESALE:	0		
INTERDEPARTMENTAL	274,880		
TOTAL PG&E SALES	71,730,803		
NON-UTILITY PROCUREMENT			
DIRECT ACCESS	10,960,011	11,090,888	11,486,353
COMMUNITY CHOICE AGGREGATION	36,497,927	37,218,059	40,152,873
RAILWAY (BART)	365,338	360,000	360,000
TOTAL	47,823,276	48,668,946	51,999,226

Note: The 2025 forecast shown here is produced as part of the process to forecast the 2026 test-year and aligns with the forecast adopted by D.22 12 044 in PG&E's 2025 ERRA Forecast proceeding.

Confidential Information Protected under D.06-06-066, D.14-10-033, Public Utilities Code Section 545.5(G), and/or trade secret
Submitted Under Public Utility Code Section 583

CalAdv-10: Excerpt from California Energy Commission California Energy Demand Forecast, 2024=2045 Baseline, Form 2.2: Economic and Demographic Assumptions



AutoSave Off | Cal Adv-10 TN268179-5_20260107T092245_CED 2025 Baseline Forecast - PGE - Read-... • Saved to this PC | Search

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Cut Copy Format Painter | Paste | Clipboard | Calibri 11 | Font | Wrap Text Merge & Center | Alignment | Number | Conditional Formatting Format as Table Cell Styles | Styles | Insert Delete Format | Cells | AutoSum Fill Clear Sort & Filter Find & Select | Editing | Sensitivity | Add-ins

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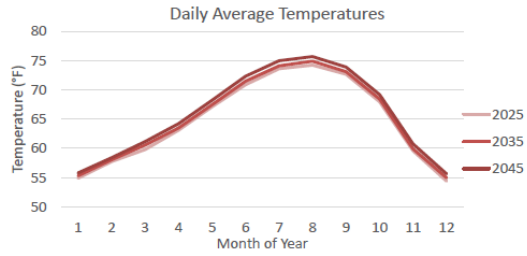
	A	B	C	D	E	F	G	H
9	**2003**	12,229	4,279	773,074	4,271	2,138	79	61
10	**2004**	12,331	4,324	790,719	4,283	2,168	85	63
11	**2005**	12,403	4,378	806,194	4,355	2,198	97	65
12	**2006**	12,511	4,434	846,205	4,444	2,222	104	67
13	**2007**	12,651	4,481	870,617	4,531	2,250	114	69
14	**2008**	12,784	4,519	868,037	4,548	2,279	132	70
15	**2009**	12,880	4,540	836,987	4,366	2,302	124	71
16	**2010**	12,989	4,552	867,592	4,344	2,318	116	72
17	**2011**	13,121	4,564	907,112	4,412	2,326	110	73
18	**2012**	13,264	4,582	952,556	4,529	2,331	115	74
19	**2013**	13,397	4,606	959,328	4,670	2,341	122	76
20	**2014**	13,530	4,631	1,011,663	4,826	2,348	131	77
21	**2015**	13,657	4,658	1,087,074	4,989	2,359	137	78
22	**2016**	13,761	4,689	1,138,209	5,145	2,371	142	78
23	**2017**	13,847	4,722	1,188,800	5,265	2,380	154	80
24	**2018**	13,921	4,755	1,237,960	5,365	2,399	168	82
25	**2019**	13,959	4,773	1,278,777	5,460	2,420	175	83
26	**2020**	13,952	4,871	1,379,411	5,059	2,434	169	84
27	**2021**	13,812	4,908	1,459,356	5,199	2,447	192	88
28	**2022**	13,801	4,946	1,344,978	5,495	2,456	187	94
29	**2023**	13,798	4,994	1,373,062	5,542	2,466	187	98
30	**2024**	13,809	5,031	1,428,504	5,583	2,476	181	100
31	**2025**	13,841	5,070	1,451,658	5,613	2,490	181	103
32	**2026**	13,883	5,126	1,480,513	5,614	2,504	183	106
33	**2027**	13,929	5,170	1,518,091	5,619	2,518	189	108
34	**2028**	13,979	5,224	1,552,152	5,644	2,534	196	110
35	**2029**	14,034	5,280	1,594,180	5,677	2,550	203	112
36	**2030**	14,095	5,338	1,642,319	5,724	2,567	211	114
37	**2031**	14,161	5,391	1,692,407	5,769	2,585	220	116
38	**2032**	14,232	5,448	1,742,796	5,793	2,604	227	119
39	**2033**	14,301	5,502	1,791,122	5,803	2,623	232	121
40	**2034**	14,366	5,552	1,836,861	5,808	2,643	238	123
41	**2035**	14,431	5,612	1,881,514	5,814	2,663	243	126
42	**2036**	14,495	5,658	1,927,630	5,827	2,684	250	128
43	**2037**	14,559	5,703	1,973,967	5,841	2,706	256	131

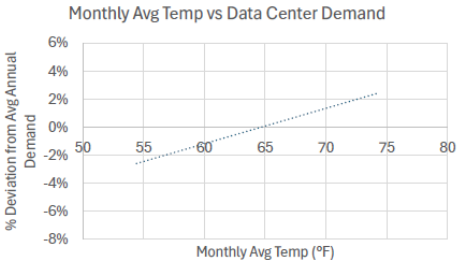
CalAdv-11: Conde, J., PG&E Data Center Forecasting, Presentation by PG&E during the July 16 DAWG Workshop, July 16, 2025, TN #264914, published on CEC Docket No. 25-IEPR-03 on July 18, 2025, slide 10

Available at:
https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=25-IEPR-03.

Data Center Forecast Methodology: Seasonality

PG&E incorporated seasonality into the hourly data center forecast by modeling the relationship between historical cooling degree days and data center demand.





- Data center electricity demand depends largely on cooling loads
- Used cooling degree day data based on temperature forecasts as a proxy for cooling loads in data centers
- Ran regression to quantify relationship between historical data center monthly demand and cooling degree day data
- Applied regression coefficients to forecasted values for cooling degree days

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