



**PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION**

APPENDIX C

SUPPORTING ATTACHMENTS

**TO PREPARED TESTIMONY
ON THE APPLICATION OF PACIFIC GAS AND ELECTRIC
COMPANY FOR APPROVAL OF ELECTRIC RULE NO. 30
FOR TRANSMISSION-LEVEL RETAIL ELECTRIC SERVICE**

PUBLIC

San Francisco, California
July 17, 2025

LIST OF ATTACHMENTS FOR APPENDIX C

APPENDIX	DOCUMENT DESCRIPTION	CONFIDENTIAL DESIGNATION
C-1	<ol style="list-style-type: none"> 1. PG&E Revised Supplemental Response to Cal Advocates Data Request No. 06, Question 03, served on <u>June 2, 2025</u> 2. attachment ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates006-Q003Rev01Supp01Atch01CONF.xlsx 3. PG&E declaration claiming confidentiality 	CONFIDENTIAL attachment only (PDF file)
C-2	<ol style="list-style-type: none"> 1. PG&E Response to Cal Advocates Data Request No. 01, Question 09 	no
C-3	<ol style="list-style-type: none"> 1. PG&E Response to Cal Advocates Data Request No. 06, Question 03, served on <u>April 10, 2025</u> 2. attachment <i>ElectricRule30-TransmissionLevelInterconnection_DR_CalAdvocates_06-Q003Atch01CONF.xlsx</i> 3. PG&E declaration claiming confidentiality 	CONFIDENTIAL attachment only (PDF file)
C-4	<ol style="list-style-type: none"> 1. PG&E Revised Response to Cal Advocates Data Request No. 04, Question 13 served on March 24, 2025 2. PG&E Revised Response to Cal Advocates Data Request No. 04, Question 13. (<i>17 PES Reports</i>) 3. PG&E declaration claiming confidentiality 	CONFIDENTIAL 17 attachments only (PDF - PES reports are all confidential)
C-5	PG&E Supplemental Response to Cal Advocates Data Request No. 01 Question 02 served on February 14, 2025	no
C-6	PG&E Response to Cal Advocates Data Request No. 04, Question 19 served on March 21, 2025	no
C-7	PG&E Response to Cal Advocates Data Request No. 04, Question 05, served on March 20, 2025	no
C-8	PG&E Response to Cal Advocates Data Request No. 02, Question 05 served on February 4, 2025	no
C-9	PG&E Response to Cal Advocates Data Request No. 01, Question 01 served on January 23, 2025	no
C-10	PG&E Response to Cal Advocates Data Request No. 02, Question 01 served on February 4, 2025	no
C-11	PG&E Response to Cal Advocates Data Request No. 04, Question 01 served on February 28, 2025	no

APPENDIX	DOCUMENT DESCRIPTION	CONFIDENTIAL DESIGNATION
C-12	PG&E Response to Cal Advocates Data Request No. 010, Question 012 served on June 3, 2025	no
C-13	PG&E Response to Cal Advocates Data Request No. 010, Question 010 served on June 03, 2025	no
C-14	PG&E Response to Cal Advocates Data Request No. 011, Question 15, served on June 12, 2025	no
C-15	1. PG&E Response to Cal Advocates Data Request No. 04, Question 14, serve February 21, 2025 2. Declaration Supporting Confidential Designation of PGE	no
C-16	1. PG&E Response to Energy Division Data Request No. 01, Follow-Up Question 6c, served on January 10, 2025 2. Attachment - [REDACTED] 3. PG&E declaration claiming confidentiality	CONFIDENTIAL attachment only (PDF file)

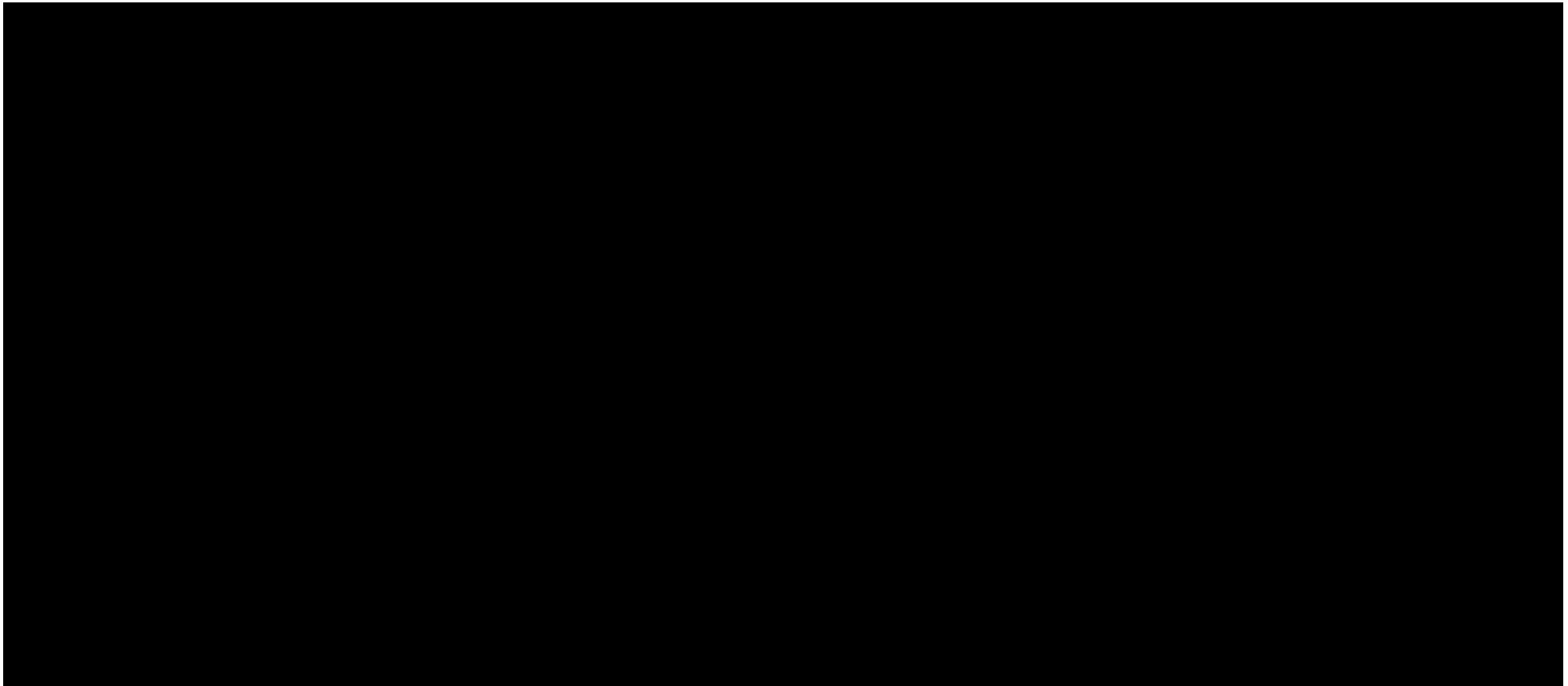
APPENDIX C-1

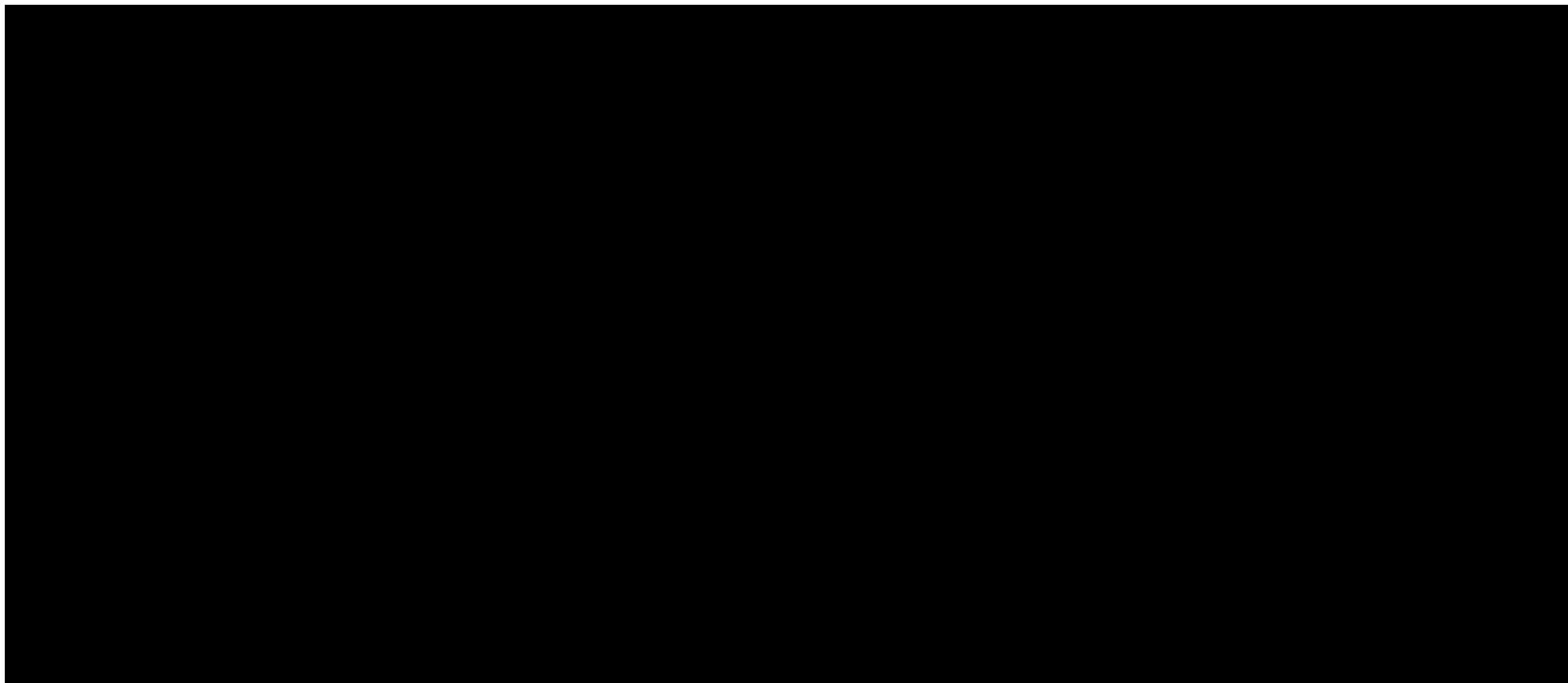
1. PG&E Revised Supplemental Response to Cal Advocates Data Request No. 06, Question 03, served on June 2, 2025 **CONFIDENTIAL**
2. Attachment ElectricRule30-Transmission-LevelInterconnections_
DR_CalAdvocates006-Q003Rev01Supp01Atch01CONF.xlsx
CONFIDENTIAL
3. PG&E declaration claiming confidentiality

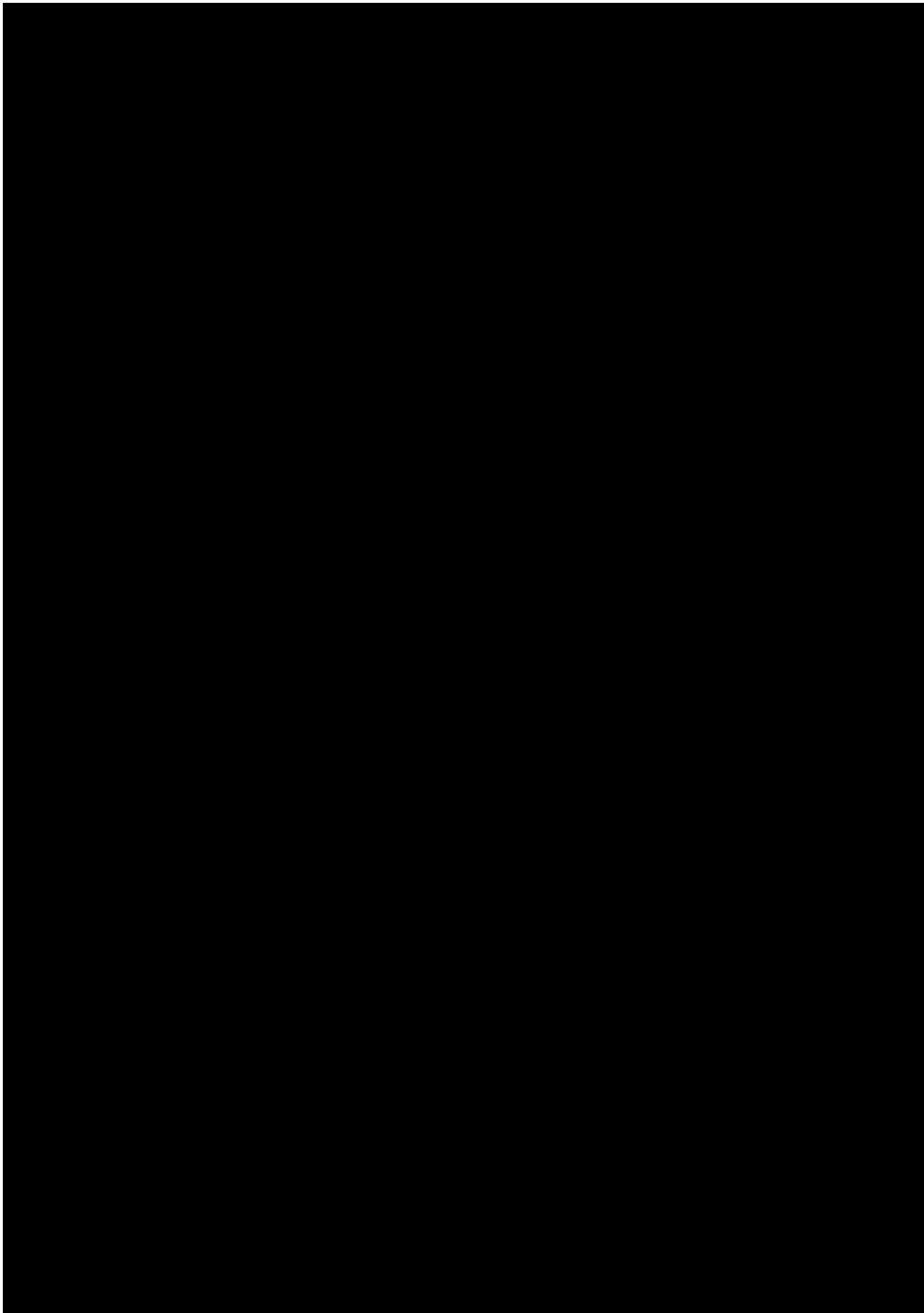
APPENDIX C-1

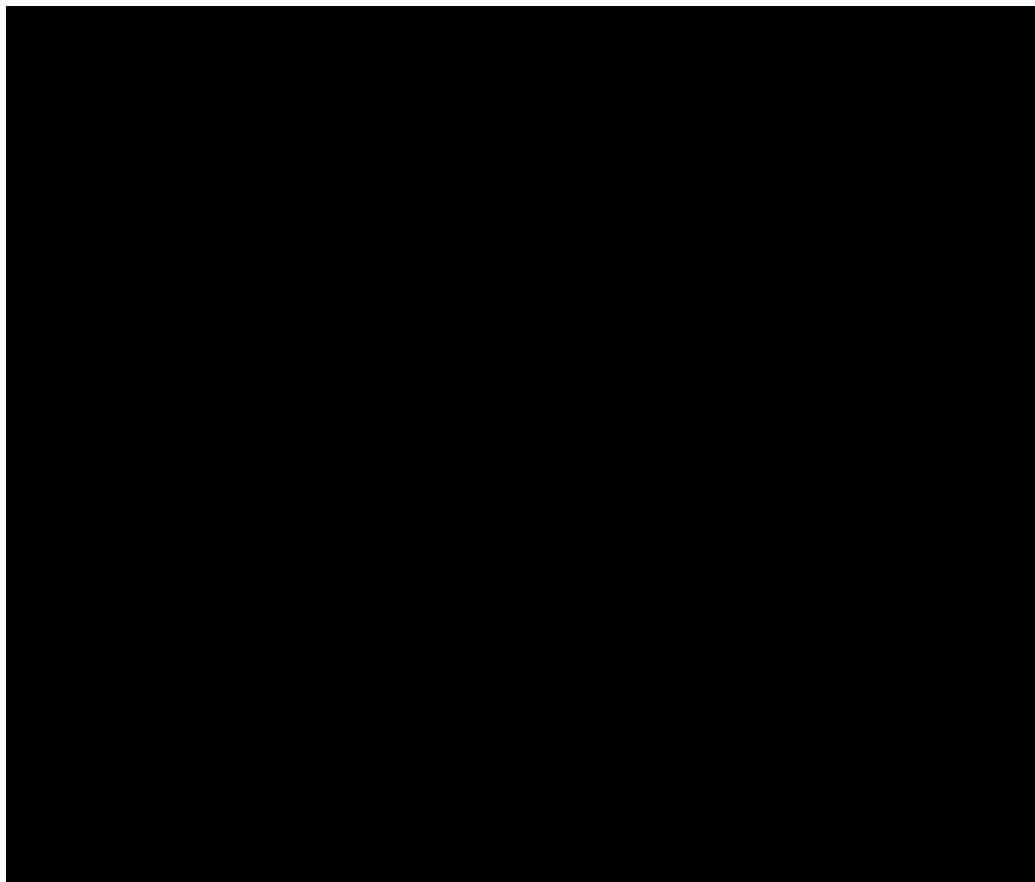
1. PG&E Revised Supplemental Response to Cal Advocates
Data Request No. 06, Question 03, served on June 2, 2025

CONFIDENTIAL









2. Attachment ElectricRule30-Transmission-
LevelInterconnections_DR_CalAdvocates006-
Q003Rev01Supp01Atch01CONF.xlsx **CONFIDENTIAL**

raPACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 – Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	CalAdvocates_006-Q003Rev01Supp01CONF
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_006-Q003Rev01Supp01CONF
Request Date:	April 10, 2025
Requester DR No.:	006Rev01
Requesting Party:	Cal Advocates
Requester:	Kimiko Akiya, Martin McCormack, Jane Roschen
Date Sent:	June 2, 2025
PG&E Witness(es):	Ben Moffat, Josh Jones – Engineering, Planning and Strategy Ashwini Mani – Electric Engineering

SUBJECT:

REVISED QUESTION 003

In response to Data Request No. Cal Advocates 01 Question 008, PG&E provided information about applications for transmission-level retail service from 2019 to 2024. In response to Energy Division's December 19, 2024 Follow-Up Questions Regarding Electric Rule 30 Application Question 6c, PG&E provided its [REDACTED]

[REDACTED] The following questions pertain to PG&E's response to this these questions and the applicant information provided in attachment *Transmission LevelInterconnections_DR_CalAdvocates_001-Q008Atch01CONF.xlsx*.

- a. PG&E's data indicates that at least [REDACTED]
[REDACTED].¹ For each [REDACTED] application please provide the information listed in the attachment *CalAdvocates_DR006-Q003 CONF.xlsx* and below as items (i) through (xxi).² If the exact date of a milestone is not known, please provide the month and year. If the month and year of a milestone are not known, please provide "Complete" in the table, if applicable, rather than the date to indicate that the milestone has been completed. If the milestone has not yet occurred or is not applicable, please state "N/A". Please correct and/or reorder information in attachment *CalAdvocates_DR006-Q003 CONF.xlsx* as needed.
 - i. Whether the applicant has provided a complete application;

-
- 1 Information PG&E has designated confidential is highlighted in grey.
 - 2 In the attached spreadsheet, information PG&E has designated confidential is highlighted in grey. For columns E and G, PG&E included this information in its public filing, and Cal Advocates did not redact highlight as designated confidential information. See Pacific Gas and Electric Company's (U 39 E) Response to Administrative Law Judge's Ruling Requesting Information on the Motion for Interim Implementation of Electric Rule No. 30 [PUBLIC VERSION], April 4, 2025, at Attachment A.

- ii. Whether the customer has submitted a deposit;
- iii. Amount of the deposit;
- iv. Date PG&E provided engineering advance (EA) invoice to the customer, if applicable;
- v. Date customer paid EA, if applicable;
- vi. Amount of initial EA, if applicable;
- vii. Date PG&E last updated the EA amount, if applicable;
- viii. Total EA amount provided by the customer to date;
- ix. Total amount of additional payments provided by the customer to date, if any;
- x. Date PG&E provided a Preliminary Engineering Study (PES) study plan to the customer, if applicable;
- xi. Date PG&E started a PES, if applicable;
- xii. Date PG&E provided a draft PES to the customer, if applicable;
- xiii. Date PG&E completed a final PES, if applicable;
- xiv. Date PG&E started a detailed interconnection study, if applicable;
- xv. Date PG&E completed a detailed interconnection study, if applicable;
- xvi. Date PG&E submitted a PES or similar report to the CAISO, if applicable;
- xvii. Whether PG&E has determined an exceptional case filing is necessary under procedures in Rules 15 and 16;
- xviii. Date PG&E provided draft interconnection agreement(s) to the customer, if applicable;
- xix. Date customer signed the interconnection agreement(s), if applicable;
- xx. Estimated project construction start date, if applicable;
- xxi. Estimated project energization date, if applicable;
- ~~xxii. Total allowances and other payments provided by the customer to date;~~
- ~~xxiii. Whether PG&E has started a Preliminary Engineering Study;~~
- ~~xxiv. Whether PG&E has completed a Preliminary Engineering Study;~~
- xxv. Update the table with the latest data available to PG&E (i.e., all applications in progress as of ~~March 10, 2025~~ April 9, 2025).

- b. PG&E's data indicates that [REDACTED]
[REDACTED] For each [REDACTED] in the attachment *Transmission Level\Interconnections _DR_CalAdvocates_001-Q008Atch01CONF.xlsx* please provide:
- i. The date of [REDACTED];
 - ii. Whether the customer had submitted a deposit;
 - iii. Amount of the deposit;
 - iv. Total allowances and other payments provided by the customer to date;
 - v. Deposit amount refunded;
 - vi. Total allowance and other payments refunded;
 - vii. Total refund the customer is entitled to receive;
 - viii. Whether PG&E started a Preliminary Engineering Study;
 - ix. Whether PG&E completed a Preliminary Engineering Study;
 - x. The completed Preliminary Engineering Study, if available.
- c. Do the [REDACTED] included in *Transmission Level\Interconnections _DR_CalAdvocates_001-Q008Atch01CONF.xlsx* represent the entirety of the transmission-level service applications submitted between [REDACTED] that have been [REDACTED]? Are there other applications that have been [REDACTED] over this period that may not be reflected in the table?

ANSWER 003 - UPDATED

PLEASE NOTE THAT ATTACHMENT(S) TO THIS DATA RESPONSE CONTAIN HIGHLY CONFIDENTIAL INFORMATION AND IS PROVIDED PURSUANT TO THE ATTACHED DECLARATION DATED MAY 14, 2025.

- a. PG&E previously provided a response to this subpart on April 10, 2025. Cal Advocates provided a revised request on April 10, 2025 that substantially and significantly expanded the scope of this request. PG&E objects to the revised request as burdensome. The revised request includes 22 separate pieces of information regarding more than 50 projects. To gather much of this information, PG&E would need to review applications, some of which were submitted years ago, review project-specific accounting records, and review notes, individual e-mails, and other information from PG&E employees. Much of this information is kept in a decentralized manner and requires going to numerous individuals and/or systems to gather and/or verify the information. Subject to these objections and given the scope of the request, PG&E has made a good faith effort to populate the highly confidential attachment *ElectricRule30-Transmission-Level\Interconnections_DR_CalAdvocates_006-Q003Rev01Atch01CONF.xlsx*. PG&E has not been able to populate every cell in the attachment. In addition, PG&E has not had the time to perform a validation of the accuracy of the data in

each cell. While PG&E has populated cells with preliminary data, many cells would need to be verified for accuracy. Thus, this response is preliminary and subject to change as PG&E populates and/or verifies the information provided.

- b. PG&E previously provided a response to this subpart on April 10, 2025. Cal Advocates has not updated its request so there is no need to update this subpart.
- c. PG&E previously provided a response to this subpart on April 10, 2025. Cal Advocates has not updated its request so there is no need to update this subpart.

SUPPLEMENTAL ANSWER 003

Please note that attachment(s) to this data response contain Highly Confidential information and is provided pursuant to the attached declaration dated May 30, 2025.

- a. PG&E previously provided a response to this subpart on May 14, 2025. PG&E has made a good faith effort to update the highly confidential attachment by reviewing and updating where appropriate the information provided in *ElectricRule30-Transmission-LevelIInterconnections_DR_CalAdvocates_006-Q003Rev01Supp01Atch01CONF.xlsx*.

3. PG&E declaration claiming confidentiality

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

**DECLARATION SUPPORTING HIGHLY CONFIDENTIAL DESIGNATION
ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

1. I, Michael Medeiros, am a/the VP, South Bay Delivery at Pacific Gas and Electric Company (“PG&E”), a California corporation. My business office is located at:

Pacific Gas and Electric Company
300 Lakeside Dr.
Oakland, CA 94612

2. PG&E will produce the information identified in Paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.

Name or Docket No. of CPUC Proceeding (if applicable): Application 24-11-007

3. Title and description of document(s): PG&E’s Response to Cal Advocates’ Data Request Set #6, Revised Question 3 Regarding A.24-11-007
-

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart, with further detail provided in Appendix A, which is incorporated into this declaration:

**Where Highly
Confidential Information
is Located on the
Documents**

Check	Basis for Highly Confidential Treatment	Where Highly Confidential Information is Located on the Documents
<input checked="" type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data.</p> <p>(Protected under Pub. Util. Code § 8380; Civ. Code §§ 1798 <i>et seq.</i>; CPUC Decisions (D.) 14-05-016)</p>	Excel file in its entirety
<input type="checkbox"/>	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver's license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual.</p> <p>(Protected under Civ. Code §§ 1798 <i>et seq.</i>; Gov. Code § 7927.400; 42 U.S.C. § 1320d-6; General Order (G.O.) 77-M; see also CPUC D. 04-08-055, 06-12-029)</p>	
<input checked="" type="checkbox"/>	<p>Physical facility, cyber-security sensitive, or critical infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113 and/or General Order 66-D (“The subject information: (1) is not customarily in the public domain by providing a declaration in compliance with Section 3.2(c) stating that the subject information is not related to the location of a physical structure that is visible with the naked eye or is available publicly online or in print; and (2) the subject information either: could allow a bad actor to attack, compromise or incapacitate physically or electronically a facility providing critical utility service; or discusses vulnerabilities of a facility providing critical utility service”).</p> <p>(Protected under Gov. Code § 7927.705, 7929.205; 6 U.S.C. § 671; 6 CFR § 29.2)</p>	
<input type="checkbox"/>	<p>Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data.</p> <p>(Protected under Civ. Code §§ 3426 <i>et seq.</i>; Gov. Code §§ 7927.300, 7927.705, 7929.420, 7927.605, 7930.205; Evid. Code §1060; CPUC D.11-01-036)</p>	
<input checked="" type="checkbox"/>	<p>Corporate financial records.</p> <p>(Protected under Gov. Code §§ 7927.705, 7927.605)</p>	



Third-Party information subject to non-disclosure or confidentiality agreements or obligations.

(Protected under Gov. Code § 7927.705; see, e.g., CPUC D.11-01-036)



Other categories where disclosure would be against the public interest.

(Gov. Code § 7922.000)

-
-
-
-
5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
 6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
 7. Executed on this 14th day of May, 2025 at Oakland, California.

/s/ Michael Medeiros
Michael Medeiros

VP, South Bay Delivery

Pacific Gas and Electric Company

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

Application 24-11-007
ATTACHMENT TO DECLARATION
May 14, 2025

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
CalAdvocates_006-Q003Rev01Atch01CONF.xlsx.	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_006-Q003Rev01Atch01CONF.xlsx.	Customer-specific data, which may include demand, loads, names, addresses, and billing data	Excel file in its entirety

APPENDIX C-2

1. PG&E Response to Cal Advocates Data Request No. 01, Question 09

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 - Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	CalAdvocates_001-Q009
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_001-Q009
Request Date:	January 8, 2025
Requester DR No.:	Cal Advocates 01 – PG&E
Requesting Party:	Public Advocates Office
Requester:	Jane Roschen
Date Sent:	January 23, 2025
PG&E Witness(es):	Ben Moffat – Engineering, Planning and Strategy

SUBJECT: CUSTOMER APPLICATIONS AND HISTORICAL LOADS

QUESTION 009

PG&E states that it currently negotiates “individual transmission-level customer agreements.”¹ The following questions refers to PG&E’s existing process for receiving interconnection requests from customers seeking transmission-level service and the current process of exceptional case filings. The term “applicant” refers to the entity that requests or inquires about transmission level service regardless of whether they have submitted an application.

- a. Describe the existing process by which an applicant submits an application to PG&E for transmission level service.
- b. What materials, if any, are applicants required or expected to provide before PG&E processes an application for transmission level service?
- c. What fees or deposits, if any, do applicants submit to PG&E in the process of requesting transmission level service?
- d. Is interest recovered in connection with an individual transmission-level customer agreement? If yes, please explain the jurisdictional formula rate used.
- e. Does PG&E engage in preliminary discussions with the applicant or otherwise receive an indication of the applicant’s interest in transmission level service **before** an applicant formally begins negotiation of a transmission-level customer agreement? If yes, please provide a general description of the initial interaction between PG&E and the applicant before the application is submitted to PG&E.
- f. Please list the “exceptional case filing[s]” submitted by PG&E to the CPUC over the past five (5) years.
- g. PG&E describes hypothetical scenarios of annual bill savings for existing customers with new transmission-level retail electric load customers.² In the same format as

¹ Application, at p. 1, 3

² PG&E Testimony, at 3-9.

Table 3-1 on page 3-7, provide the 10-year contribution to margin for transmission-level electric customers that began retail service with PG&E over the past 10 years.

ANSWER 009

- a. Applicants for new electric service are required to submit an application via the online portal at [Your Project portal](#).
- b. At a minimum, Applicants are required to provide: (1) a site plan; (2) details regarding electrical load; and (3) details regarding the Applicant's electrical load ramp up schedule.
- c. Applicants typically provide a deposit to start the study for the transmission service that start at \$25,000.
- d. PG&E was unclear as to the interest being referred to in this subpart. Interest is not paid on the deposit amount described in subpart (c). The deposit is typically not refunded to the Applicant.
- e. There is not a formal discussion for customers considering transmission versus distribution level interconnections prior to the customer submitting an application, unless the customer initiates pre-submission inquiries. After an application is submitted, for large load projects, many of which interconnect at transmission level voltages, PG&E requires a large load study (Preliminary Engineering Study or "PES") to determine the best solution for serving the customer. One of the options evaluated during the PES is whether the customer should interconnect at transmission-level voltages. In addition, a customer can voluntarily choose to pursue a transmission service for loads greater than 4 megawatts (MW).
- f. Please see the below table for exceptional case filings:

Advice Number	Subject	Date Filed	Disposition Date	Status
7427-E	Electric Rule 16 Exceptional Case Submittal for Issuance of Electric Contract Subsidies for 555 Bryant Street, San Francisco CA, in Accordance with CPUC Decision 23-12-037	11/08/2024	NA	Withdrawn 1/22/2025
7281-E	Agreement With Signature Homes, Inc. for Relocation of PG&E's Facilities, in Accordance With Electric Rule No. 15.I.3, the	5/24/2024	NA	Rejected 12/22/2024

Advice Number	Subject	Date Filed	Disposition Date	Status
	Exceptional Cases Provision			
7224-E	Agreement With MCD - North Stockton, LLC for Relocation of PG&E's Facilities, in Accordance With Electric Rule No. 15.I.3, the Exceptional Cases Provision	3/27/2024	8/22/2024	Approved
6975-E*	Electric Rule 13 Exceptional Case Submittal for Electric Transmission Service Facilities to Santa Clara Valley Transit Authority ("VTA"), in Accordance with General Order 96-B, Section 9.2.3.	6/29/2023	7/11/2024	Approved
5848-E*	Electric Rule 15/16 Exceptional Case Submittal for Santa Teresa Substation	6/18/2020	5/12/2021	Approved
3990-E	Electric Rule 15/16 Exceptional Case Agreement for Plains Exploration and Production Company	1/12/2012	4/25/2012	Approved
3383-E	Electric Rule 15/16 Exceptional Case Line Extension Agreement for Nevada County	12/19/2008	2/27/2009	Approved
3369-E	Electric Rule 15/16 Exceptional Case Agreement for the East Bay Municipal Utilities District Camanche Pumping Plant	11/24/2008	1/8/2009	Approved
2938-E	Request for Exceptional Case Treatment to Allow an Overhead Line	11/28/2006	1/12/2007	Approved

Advice Number	Subject	Date Filed	Disposition Date	Status
	Extension to Serve the Community of Scotia in Humboldt County			
2824-E	Electric Distribution Agreement to Perform Tariff Scheduled Related Work Exceptional Case Agreement for City and County of San Francisco	5/8/2006	6/8/2006	Approved
2641-G/ 2674-E	Line Extension Agreement for Kern County Water Agency	6/14/2005	7/13/2005	Approved

- g. PG&E is currently compiling the data to prepare a response to subpart (g) and will provide a response as soon as possible to the extent the necessary data to complete the calculations is available.

APPENDIX C-3

1. PG&E Response to Cal Advocates Data Request No. 06, Question 03, served on April 10, 2025
2. Attachment *Electric Rule 30 Transmission Level Interconnection DR Cal Advocates 006-Q003Atch01CONF.xlsx* **CONFIDENTIAL**
3. PG&E declaration claiming confidentiality

**1. PG&E Response to Cal Advocates Data
Request No. 06, Question 03, served on
April 10, 2025**

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 - Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	CalAdvocates_006-Q003
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_006-Q003
Request Date:	March 11, 2025
Requester DR No.:	006
Requesting Party:	Public Advocates Office
Requester:	Jane Roschen, Kimiko Akiya, Martin McCormack
Date Sent:	April 10, 2025
PG&E Witness(es):	Ben Moffat – Engineering, Planning and Strategy

QUESTION 003

In response to Data Request No. Cal Advocates 01 Question 008, PG&E provided information about applications for transmission-level retail service from 2019 to 2024. The following questions pertain to PG&E's response to this question and its attachment *Transmission LevelInterconnections_DR_CalAdvocates_001-Q008Atch01CONF.xlsx*.

- a. PG&E's data indicates that at least 50 applications are categorized as being in progress. For each in progress application in the attachment *Transmission LevelInterconnections_DR_CalAdvocates_001-Q008Atch01CONF.xlsx* please provide:
 - i. Whether the customer has submitted a deposit;
 - ii. Amount of the deposit;
 - iii. Total allowances and other payments provided by the applicant to date;
 - iv. Whether PG&E has started a Preliminary Engineering Study;
 - v. Whether PG&E has completed a Preliminary Engineering Study;
 - vi. Update the table with the latest data available to PG&E (i.e., all applications in progress as of March 10, 2025).
- b. PG&E's data indicates that 13 applications were withdrawn between 2019 and 2024. For each withdrawn application in the attachment *Transmission LevelInterconnections_DR_CalAdvocates_001-Q008Atch01CONF.xlsx* please provide:
 - i. The date of withdrawal;
 - ii. Whether the customer had submitted a deposit;
 - iii. Amount of the deposit;
 - iv. Total allowances and other payments provided by the applicant to date;
 - v. Deposit amount refunded;

- vi. Total allowance and other payments refunded;
 - vii. Total refund the applicant is entitled to receive;
 - viii. Whether PG&E started a Preliminary Engineering Study;
 - ix. Whether PG&E completed a Preliminary Engineering Study;
 - x. The completed Preliminary Engineering Study, if available.
- c. Do the 13 withdrawn applications included in *Transmission Level\Interconnections_DR_CalAdvocates_001-Q008Atch01CONF.xlsx* represent the entirety of the transmission-level service applications submitted between 2019 and 2024 that have been withdrawn? Are there other applications that have been withdrawn over this period that may not be reflected in the table?

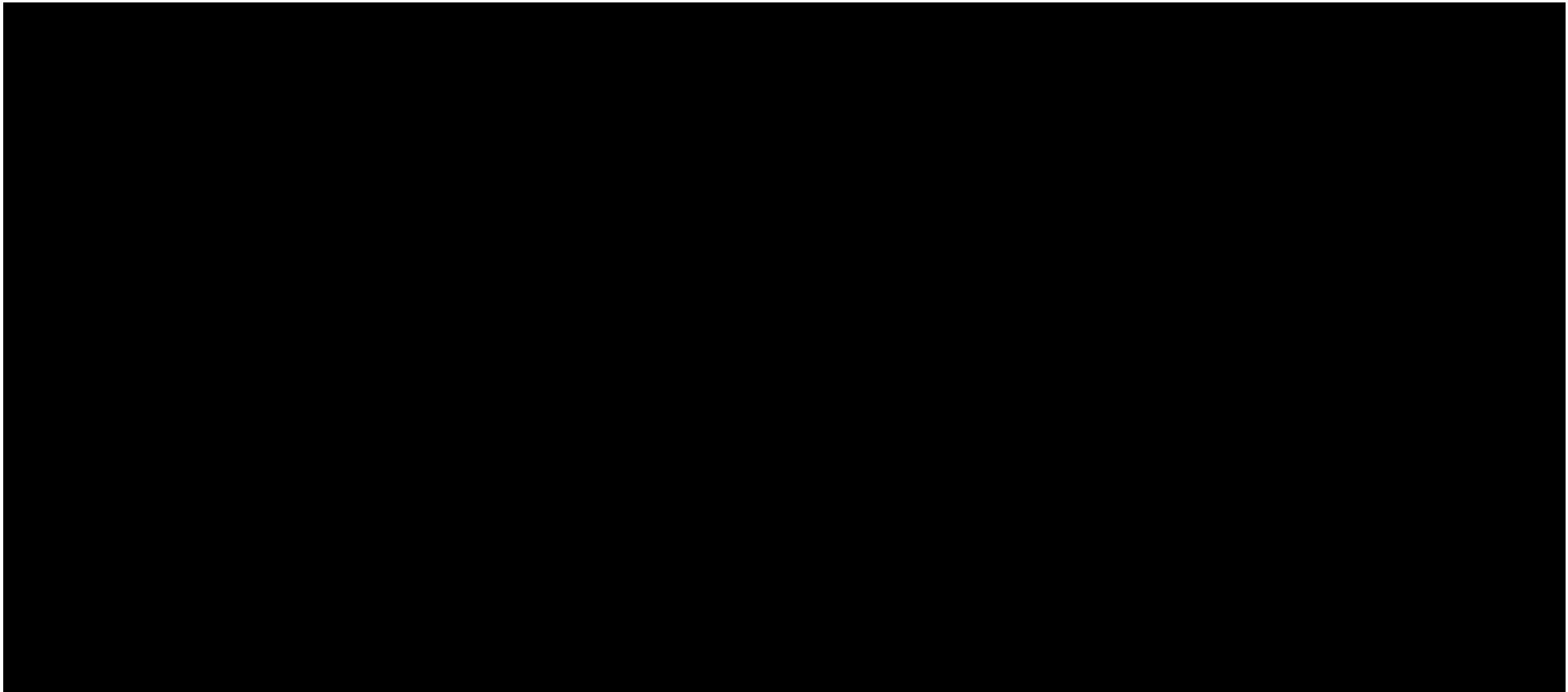
ANSWER 003

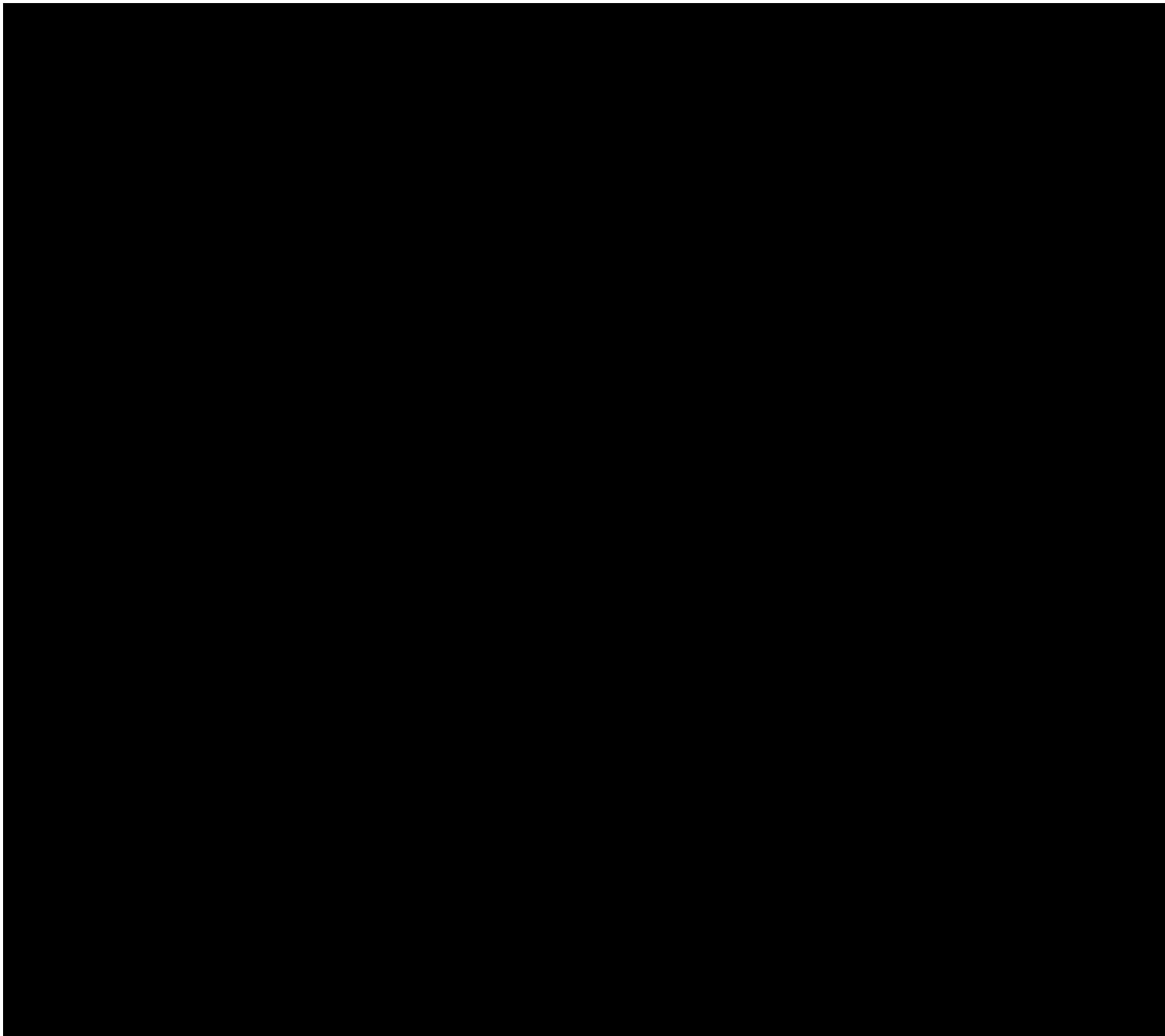
Please note that attachment(s) to this data response contain Highly Confidential information and is provided pursuant to the attached declaration dated April 10, 2025.

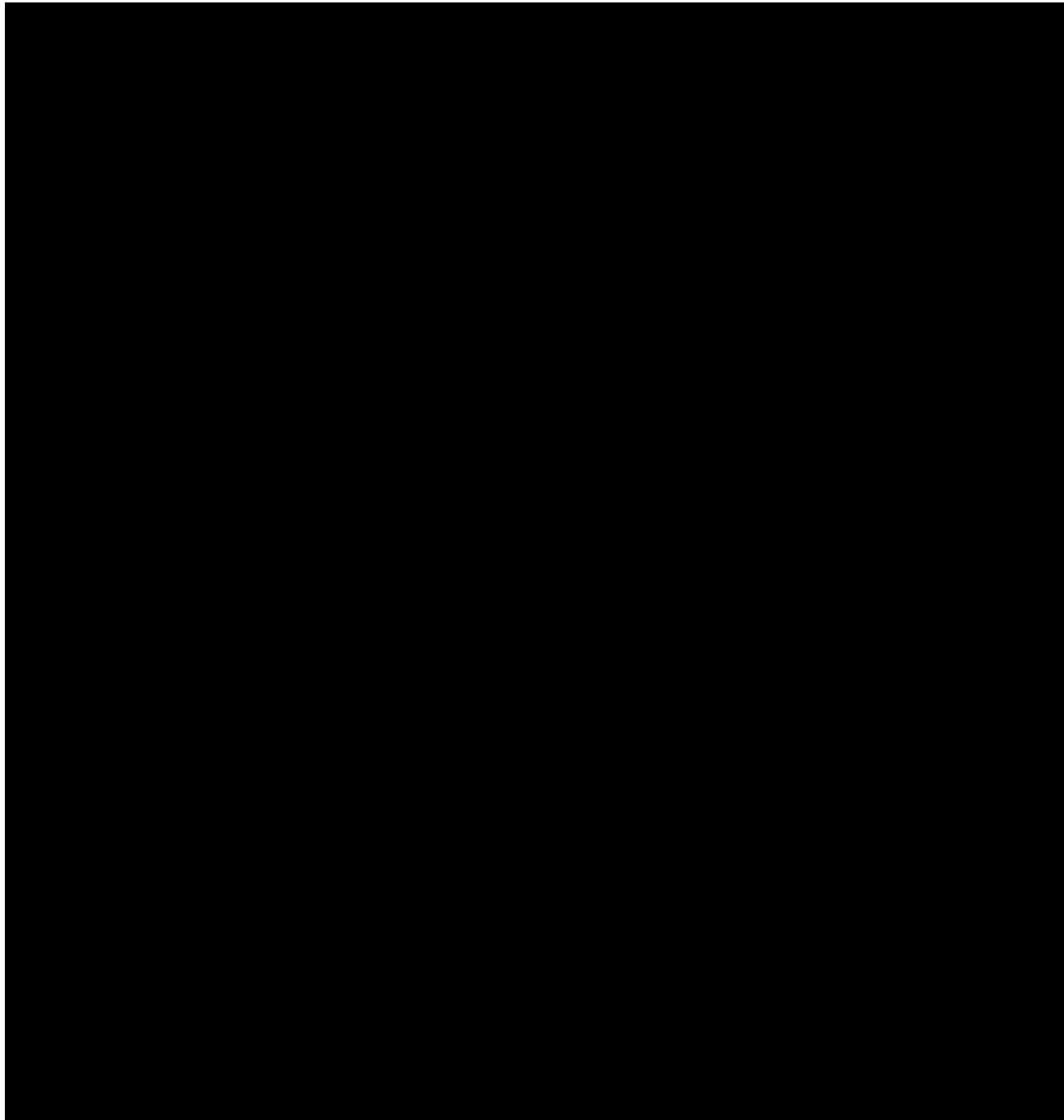
- a. Please see "Question 3a – Active" tab in highly confidential attachment *ElectricRule30-Transmission-Level\Interconnections_DR_CalAdvocates_006-Q003Atch01CONF.xlsx*. This tab shows the current available information we have at the time of this response. This tab provides data of projects that we identified have not withdrawn, Preliminary Engineering Study status, and deposit amounts.
- b. Please see "Question 3b – Withdrawn" tab in highly confidential attachment *ElectricRule30-Transmission-Level\Interconnections_DR_CalAdvocates_006-Q003Atch01CONF.xlsx*. This tab shows the current available information we have at the time of this response. This tab provides data of projects that we identified have been withdrawn, Preliminary Engineering Study status, and deposit amounts.
- c. We have included an updated list of the entirety of transmission projects we currently have information on from 2019-2024 in the attachment provided above.

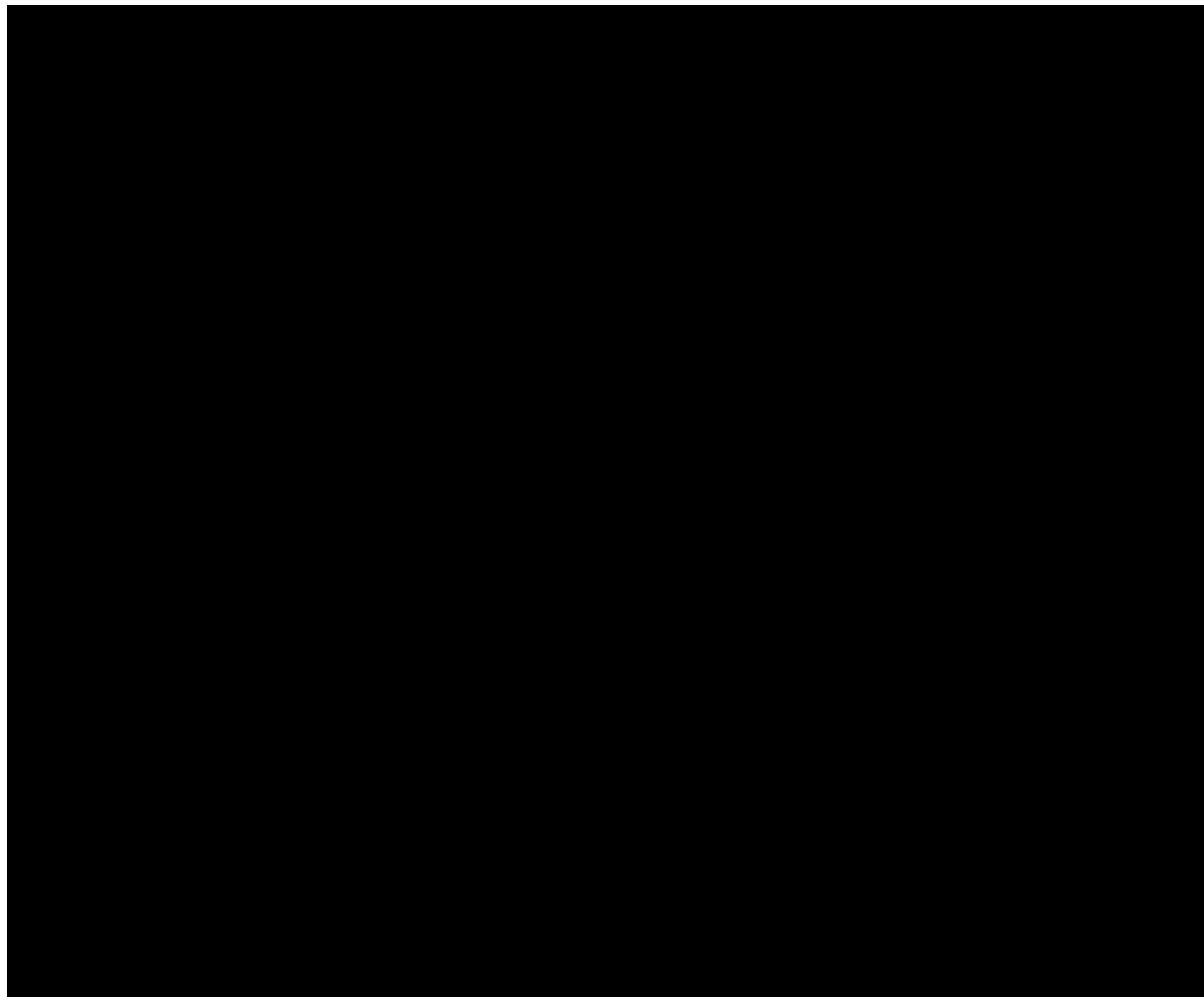
**2. Attachment *Electric Rule 30 Transmission Level
Interconnection DR Cal Advocates 006-
Q003Atch01CONF.xlsx* CONFIDENTIAL**

This document contains HIGHLY CONFIDENTIAL information described in Declaration Supporting Confidential Designation dated April 10, 2025.









3. PG&E declaration claiming confidentiality

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

**DECLARATION SUPPORTING HIGHLY CONFIDENTIAL DESIGNATION
ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

1. I, Michael Medeiros, am a/the VP, South Bay Delivery at Pacific Gas and Electric Company (“PG&E”), a California corporation. My business office is located at:

Pacific Gas and Electric Company
300 Lakeside Dr.
Oakland, CA 94612

2. PG&E will produce the information identified in Paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.

Name or Docket No. of CPUC Proceeding (if applicable): Application 24-11-007

3. Title and description of document(s): PG&E’s Response to Cal Advocates’ Data Request Set #6 Regarding A.24-11-007
-

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart, with further detail provided in Appendix A, which is incorporated into this declaration:

Check	Basis for Highly Confidential Treatment	Where Highly Confidential Information is Located on the Documents
<input checked="" type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data.</p> <p>(Protected under Pub. Util. Code § 8380; Civ. Code §§ 1798 <i>et seq.</i>; CPUC Decisions (D.) 14-05-016)</p>	<p>Excel file in its entirety</p>
<input type="checkbox"/>	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver's license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual.</p> <p>(Protected under Civ. Code §§ 1798 <i>et seq.</i>; Gov. Code § 7927.400; 42 U.S.C. § 1320d-6; General Order (G.O.) 77-M; see also CPUC D. 04-08-055, 06-12-029)</p>	
<input checked="" type="checkbox"/>	<p>Physical facility, cyber-security sensitive, or critical infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113 and/or General Order 66-D (“The subject information: (1) is not customarily in the public domain by providing a declaration in compliance with Section 3.2(c) stating that the subject information is not related to the location of a physical structure that is visible with the naked eye or is available publicly online or in print; and (2) the subject information either: could allow a bad actor to attack, compromise or incapacitate physically or electronically a facility providing critical utility service; or discusses vulnerabilities of a facility providing critical utility service”).</p> <p>(Protected under Gov. Code § 7927.705, 7929.205; 6 U.S.C. § 671; 6 CFR § 29.2)</p>	
<input type="checkbox"/>	<p>Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data.</p> <p>(Protected under Civ. Code §§ 3426 <i>et seq.</i>; Gov. Code §§ 7927.300, 7927.705, 7929.420, 7927.605, 7930.205; Evid. Code §1060; CPUC D.11-01-036)</p>	
<input checked="" type="checkbox"/>	<p>Corporate financial records.</p> <p>(Protected under Gov. Code §§ 7927.705, 7927.605)</p>	



Third-Party information subject to non-disclosure or confidentiality agreements or obligations.

(Protected under Gov. Code § 7927.705; see, e.g., CPUC D.11-01-036)



Other categories where disclosure would be against the public interest.

(Gov. Code § 7922.000)

-
-
-
-
5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
 6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
 7. Executed on this 10th day of April, 2025 at Oakland, California.

/s/ Michael Medeiros
Michael Medeiros

VP, South Bay Delivery

Pacific Gas and Electric Company

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

Application 24-11-007
ATTACHMENT TO DECLARATION
April 10, 2025

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
CalAdvocates_006-Q003Atch01CONF.xlsx	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_006-Q003Atch01CONF.xlsx	Customer-specific data, which may include demand, loads, names, addresses, and billing data	Excel file in its entirety

APPENDIX C-4

1. PG&E Revised Response to Cal Advocates Data Request No. 04, Question 13 served on March 24, 2025
2. **CONFIDENTIAL** 17 PES Reports (Attachment to PG&E Revised Response to Cal Advocates Data Request No. 04, Question 13)
3. PG&E declaration claiming confidentiality

1. PG&E Revised Response to Cal Advocates Data
Request No. 04, Question 13 served on March 24, 2025

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 - Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	CalAdvocates_004-Q013Rev01
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_004-Q013Rev01
Request Date:	February 21, 2025
Requester DR No.:	004
Requesting Party:	Public Advocates Office
Requester:	Jane Roschen
Date Sent:	March 24, 2025
PG&E Witness(es):	Karen Khamou Ornelas – Engineering, Planning and Strategy

SUBJECT: DATA CENTERS AND PG&E SYSTEM LOADS

QUESTION 013

Provide the following updates on the PG&E 2024 Pilot Cluster Program:

- a. Provide the results from the cluster process that were made available to applicants in late 2024, including the preliminary engineering study performed in 2024 for the large load cluster pilot.¹ If not available in the study, include the following:
 - i. All work papers for the power system studies of new data centers in Santa Clara County.
 - ii. The number of proposed data centers including size and location, study inputs and assumptions, assessments, and conclusions, along with proposed local transmission system upgrades and budgetary costs for facilitating the integration of pending data center applications into the PG&E transmission network.
- b. In its Motion for Interim Implementation, PG&E states “PG&E is now involved in discussions with applicants regarding agreements for engineering or performing additional work on the applicant’s proposed interconnection.”² Does PG&E anticipate that these applications would apply as “Joint Applications” under Rule 30.C.6?
- c. Did PG&E’s cluster study result in participants reconsidering their point of interconnection, downsizing capacity, or requesting a new interconnection design? If so, please explain.

¹ In response to Data Request No. Cal Advocates 01_Q002, PG&E stated that the “2024 Large Load Preliminary Engineering Cluster Study” consisted of 17 large load interconnection projects and 60 network upgrade projects.

² Motion for Interim Implementation at 8-9.

- d. “Futureproofing” considers planning for larger capacity upgrades than needed for a single customer or generator to achieve long-term cost reductions as incremental capacity upgrades are needed in the same area in future years. Did PG&E discuss concepts of “futureproofing” transmission investments with cluster study participants to address anticipated data center load?

ANSWER 013

Please note that attachment to this data response contains highly confidential information and is provided pursuant to the attached declaration dated March 19, 2025.

- a. Please see highly confidential attachment *ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_004-Q013Atch01CONF.zip*. Please note certain customers requested identifying information be redacted in response to Question 13(a) of this data request. PG&E has redacted information in response to the requests of these customers. Please note PG&E will provide one additional preliminary engineering study in a supplemental response to Question 13(a).
- b. PG&E is currently aware of situations involving the Pilot Cluster Program applicants in which the applicants may be considered Joint Applicants under Electric Rule 30. However, projects and discussions are preliminary and no formal determination has been made yet regarding whether there will be any Joint Applicants, as that term is used in Electric Rule 30.D.6, in the Pilot Cluster Program.
- c. One of the cluster study participants reduced its requested capacity. However, this reduction was unrelated to the Pilot Cluster Program.
- d. Proposed network capacity upgrades were scoped to meet the needs of the system including the additional proposed load. PG&E has prepared engineering proposals to its current standards, which include the optionality for expansion of facilities to meet future needs.

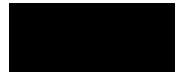
REVISED ANSWER 001

Please note that attachment to this data response contains highly confidential information and is provided pursuant to the attached declaration dated March 19, 2025.

- a. Please see highly confidential attachment *ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_004-Q013Rev01Atch01_CONF.zip* which supersedes *ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_004-Q013Atch01CONF.zip* submitted on March 20, 2025. The PDF files contained in the ZIP file were revised to include a red bold “highly confidential” statement in its headers. No other changes were made.

Lastly, PG&E is still awaiting one redacted preliminary engineering study (PES) from a customer and will provide it in a supplemental response to Question 13(a) when available.

2. **CONFIDENTIAL** 17 PES Reports (Attachment to PG&E Revised Response to Cal Advocates Data Request No. 04, Question 13)



PES Report

CONFIDENTIAL

[REDACTED] PES Report

CONFIDENTIAL

[REDACTED] PES Report

CONFIDENTIAL



PES Report

CONFIDENTIAL

[REDACTED] PES Report

CONFIDENTIAL

[REDACTED] PES Report

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PES Report

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PES Report

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PES Report

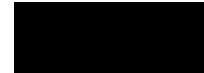
CONFIDENTIAL

[REDACTED] PES Report

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[REDACTED] PES Report

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PES Report

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PES Report

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PES Report

CONFIDENTIAL

3. PG&E declaration claiming confidentiality

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

**DECLARATION SUPPORTING HIGHLY CONFIDENTIAL DESIGNATION
ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

1. I, Michael Medeiros, am a/the VP, South Bay Delivery at Pacific Gas and Electric Company (“PG&E”), a California corporation. My business office is located at:

Pacific Gas and Electric Company
300 Lakeside Dr.
Oakland, CA 94612

2. PG&E will produce the information identified in Paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.

Name or Docket No. of CPUC Proceeding (if applicable): Application 24-11-007

3. Title and description of document(s): PG&E’s Response to Cal Advocates’ Data Request Set #4 Regarding A.24-11-007
-

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart, with further detail provided in Appendix A, which is incorporated into this declaration:

Check	Basis for Highly Confidential Treatment	Where Highly Confidential Information is Located on the Documents
<input checked="" type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data.</p> <p>(Protected under Pub. Util. Code § 8380; Civ. Code §§ 1798 <i>et seq.</i>; CPUC Decisions (D.) 14-05-016)</p>	<p>Files in their entirety contained in <i>CalAdvocates_004-Q013Atch01CONF.zip</i></p>
<input type="checkbox"/>	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver's license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual.</p> <p>(Protected under Civ. Code §§ 1798 <i>et seq.</i>; Gov. Code § 7927.400; 42 U.S.C. § 1320d-6; General Order (G.O.) 77-M; see also CPUC D. 04-08-055, 06-12-029)</p>	
<input checked="" type="checkbox"/>	<p>Physical facility, cyber-security sensitive, or critical infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113 and/or General Order 66-D ("The subject information: (1) is not customarily in the public domain by providing a declaration in compliance with Section 3.2(c) stating that the subject information is not related to the location of a physical structure that is visible with the naked eye or is available publicly online or in print; and (2) the subject information either: could allow a bad actor to attack, compromise or incapacitate physically or electronically a facility providing critical utility service; or discusses vulnerabilities of a facility providing critical utility service").</p> <p>(Protected under Gov. Code § 7927.705, 7929.205; 6 U.S.C. § 671; 6 CFR § 29.2)</p>	
<input type="checkbox"/>	<p>Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data.</p> <p>(Protected under Civ. Code §§ 3426 <i>et seq.</i>; Gov. Code §§ 7927.300, 7927.705, 7929.420, 7927.605, 7930.205; Evid. Code §1060; CPUC D.11-01-036)</p>	
<input checked="" type="checkbox"/>	<p>Corporate financial records.</p> <p>(Protected under Gov. Code §§ 7927.705, 7927.605)</p>	



Third-Party information subject to non-disclosure or confidentiality agreements or obligations.

(Protected under Gov. Code § 7927.705; see, e.g., CPUC D.11-01-036)



Other categories where disclosure would be against the public interest.

(Gov. Code § 7922.000)

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5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
 6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
 7. Executed on this 19th day of March, 2025 at Oakland, California.

/s/ Michael Medeiros
Michael Medeiros

VP, South Bay Delivery

Pacific Gas and Electric Company

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

Application 24-11-007
ATTACHMENT TO DECLARATION
March 19, 2025

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
CalAdvocates_004-Q013Atch01CONF.zip	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_004-Q013Atch01CONF.zip	Customer-specific data, which may include demand, loads, names, addresses, and billing data	Files in their entirety contained in the attachment Zip file

APPENDIX C-5

1. PG&E Supplemental Response to Cal Advocates Data Request No. 01
Question 02 served on February 14, 2025

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 - Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	CalAdvocates_001-Q002
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_001-Q002
Request Date:	January 8, 2025
Requester DR No.:	Cal Advocates 01 – PG&E
Requesting Party:	Public Advocates Office
Requester:	Jane Roschen
Date Sent:	February 14, 2025
PG&E Witness(es):	Ashwini Mani – Engineering, Planning and Strategy

SUBJECT: GENERAL QUESTIONS

QUESTION 002

Under Proposed Rule 30, if PG&E determines a Transmission Network Upgrade (Facility Type 4) is needed to serve a new transmission level customer, will the proposed upgrade require CAISO approval, and/or is PG&E able to self-approve the network upgrade? The use of the term self-approve in this context refers to the act of conducting a network upgrade without explicit approval from the CAISO or the CPUC.

- a. If CAISO approval is required for the Transmission Network upgrade, will the approval process occur through CAISO's annual Transmission Planning Process (TPP), another existing process, or a new process? If the answer to the previous question is another existing process, please provide the name of that process.
- b. If PG&E self-approves a Transmission Network upgrade needed to serve a new transmission level customer, what types of upgrades might PG&E install without CAISO approval to provide new customers with adequate electric service?
- c. If PG&E has previously identified a Transmission Network Upgrade needed to serve a new transmission level customer, what is the name and status of the project(s)?
- d. If an existing line on PG&E's transmission system has available capacity sufficient to serve a new transmission level customer, how would PG&E evaluate the customer's requested capacity with other potential uses of that available capacity?
- e. Is PG&E able to self-approve Transmission Interconnection Upgrades (Facility Type 2) and Transmission Interconnection Network Upgrades (Facility Type 3) if they are required to serve a new transmission level customer?
- f. Provide a breakdown of cost estimates by transmission facility (typical examples) and/or facility type (Nos. 1-4) and provide estimates of overhead

costs that will occur regardless of the facilities needed for transmission-level interconnections.

ANSWER 002

For clarification, PG&E notes that the term “self-approve” is not the appropriate terminology to describe transmission network upgrade work performed by PG&E. As the Federal Energy Regulatory Commission (FERC) has explained, for FERC-jurisdictional transmission assets, “asset management projects” are not within the scope of Order No. 890 and thus local transmission planning requirements do not apply to these projects.¹ For purposes of this response, PG&E understands that the phrase “self-approved projects” refers to asset management projects that are outside the scope of Order No. 890. With this clarification in mind, PG&E provides the following response:

- a. Transmission Network Upgrades (Facility Type 4) identified for Electric Rule 30 applications will generally be reviewed by the California Independent System Operator (CAISO) through the CAISO’s Annual Transmission Planning Process (TPP). In addition, Facility Types 1-3 may go through the TPP process depending on the types of facilities involved and the timing of an Applicant’s request vis-à-vis the TPP. For Facility Types 1-3 that do not go through the TPP, PG&E will submit the load interconnection information to the CAISO for the CAISO’s review and concurrence. PG&E submits these proposed facilities to the CAISO as a part of our commitment to provide reliable electric service to customers. The CAISO will review and approve these types of load interconnections. Finally, PG&E notes that its process for transmission interconnections is described in more detail in the Introduction to PG&E’s Transmission Interconnection Handbook which is publicly available at the following location: [Introduction](#).
- b. See PG&E’s response to Question 2.a.
- c. This subpart was not clear if Cal Advocates was asking about Transmission Network Upgrades identified for transmission level customers that have already interconnected to the PG&E transmission system or for customers who are requesting interconnection but have not yet been interconnected to the PG&E transmission system. PG&E’s response is based on Electric Rule 30 and since no customers have interconnected yet under Electric Rule 30, PG&E is interpreting this question to be asking about transmission level customers who have not yet interconnected to PG&E’s transmission system. With this clarification, for new customers who would be eligible for Electric Rule 30 and have not yet interconnected into PG&E’s transmission system, PG&E has not yet started the process of design, procurement and/or construction of new Transmission Network Upgrades.
- d. PG&E performs Reliability Studies using CAISO Approved Transmission Planning base cases from the most recent TPP. These base cases have assumptions for load forecast provided through the California Energy

¹ See Order No. 1920, 187 FERC ¶ 61,068 (2024) at P 1625.

Commission's (CEC) Integrated Energy Policy Report (IEPR) process that accounts for the expected load growth by area.

- e. See PG&E's response to Question 2.a.
- f. Below are the average estimated actual costs (without contingency) by transmission interconnection type derived from the 2024 Large Load Preliminary Engineering Cluster Study which consisted of 17 large load interconnection projects and 60 network upgrade projects to support the cluster study project's load requests. PG&E bills direct, indirect and overhead charges attributed to the work performed for interconnection to the capital project and therefore overhead charges are included in the estimated actual costs shown below. Studies performed to determine interconnection options are an expense and billed direct to the customer.

Transmission Interconnection Type	Cost Estimates in \$M
1. TRANSMISSION SERVICE FACILITIES	\$4.90
2. TRANSMISSION INTERCONNECTION UPGRADES	\$10.90
3. TRANSMISSION INTERCONNECTION NETWORK UPGRADES	\$12.60
4. TRANSMISSION NETWORK UPGRADES	\$30.90

ANSWER 002 SUPPLEMENT 01

- c. Cal Advocates' follow-up question to PG&E's response to Question 2c above: *"In your follow-up to DR001, please provide any Transmission Network Upgrades identified for transmission level customers that have already interconnected to the PG&E transmission system."*

PG&E has a long history of connecting retail large loads on both the transmission and distribution system. There is no single database at PG&E that can trace all the required Transmission Network Upgrades from previous studies.

Historically given the type, size and location of retail large load projects, the scope of Transmission Network Upgrades driven solely by large load projects connected to transmission and distribution system has been limited or have been integrated as part of previously planned and approved capacity projects through the CAISO's Annual Transmission Planning Process (TPP).

Recent trends in clustering of large retail large load applications, mostly data center loads in certain geographic areas, has triggered the need for Transmission Network Upgrades beyond what has been identified by the CAISO's Annual Transmission Planning process. In 2024, PG&E piloted a large load data center pilot to group such projects as a cluster study and identify Transmission Network Upgrades needed to meet the electrical demands of these projects. Preliminary Transmission Network Upgrades identified as part of the pilot data center cluster study are currently being reassessed as certain customers have withdrawn from the queue since the study initiation. These

upgrades will be submitted to the CAISO as part of the Annual Transmission Planning process for the CAISO's review and concurrence.

APPENDIX C-6

1. PG&E Response to Cal Advocates Data Request No. 04, Question 19 served on March 21, 2025

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 - Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	CalAdvocates_004-Q019
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_004-Q019
Request Date:	February 21, 2025
Requester DR No.:	004
Requesting Party:	Public Advocates Office
Requester:	Jane Roschen
Date Sent:	March 21, 2025
PG&E Witness(es):	Sharon Pierson – Corporate Affairs

SUBJECT: DATA CENTERS AND PG&E SYSTEM LOADS

QUESTION 019

Provide the number of customers, peak demand and annual net load at various nominal voltage levels within PG&E's electrical system. Provide this information by filling in the table below:

ANSWER 019

PG&E objects to this request as outside the scope of this proceeding because the number of customers, peak demand and annual net load at various nominal voltage levels within PG&E's electrical system are not relevant to Electric Rule 30. These data, compiled here by voltage, are not used in retail ratemaking or directly in transmission system planning processes. Subject to and without waiving this objection, PG&E responds as follows:

See below for the data requested. PG&E notes that the dataset used to develop this table is derived from various internal sources and not drawn from a single report or system. As such, the dataset may not fully agree with similar data reported elsewhere

for other purposes. PG&E has made best efforts to produce and review this dataset within the timeframe allowed and believes it to reasonably reflect the system.

RETAIL (2024)			
VOLTAGE LEVEL IN KILOVOLTS (KV)	# OF CUSTOMERS	ANNUAL PEAK DEMAND (MW)	ANNUAL NET LOAD (GWH)
UNDER 50 KV (DISTRIBUTION)	5,650,997	51,349	67,658
60 KV	96	270	905
70 KV	88	603	723
115 KV	223	1,467	3,717
230 KV	82	1,005	1,043
500 KV	3	28	20
TOTAL OVER 50 KV (TRANSMISSION)	492	3,373	6,408

APPENDIX C-7

1. PG&E Response to Cal Advocates Data Request No. 04, Question 05, served on March 20, 2025

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 - Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	CalAdvocates_004-Q005
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_004-Q005
Request Date:	February 21, 2025
Requester DR No.:	004
Requesting Party:	Public Advocates Office
Requester:	Jane Roschen
Date Sent:	March 20, 2025
PG&E Witness(es):	Ashwini Mani – Electric Engineering

SUBJECT: EXISTING PROCESS

QUESTION 005

What is the average cost to interconnect a customer onto PG&E's transmission system? Use historical data and specify which historical range this average cost is derived from.

- a. Please provide the following average cost per unit estimates using data from the 16 customers which interconnected at transmission-level voltages between 2014 to 2022¹ onto PG&E's electrical system:
 - i. Service upgrades at transmission voltages (Facility Type 1) on a \$/MW basis.
 - ii. Transmission interconnection upgrades on a \$/MW basis (Facility Types 2 and 3).
 - iii. Network Upgrade to the CAISO system on a \$/MW basis (Facility Type 4).
 - iv. Describe the consistency of the \$/MW cost across the 16 customer interconnection projects and the main factors that led to variation in the \$/MW cost.
 - v. If available, compare these estimates with costs derived from the 2024 Large Load Preliminary Engineering Cluster Study.
- b. Provide actual costs from facilities installed to connect new transmission-level customers and designed as "Special Facilities" by PG&E for the 16 customers described in 5.a.
- c. List the types of distribution equipment commonly needed to connect a non-residential electric customer onto PG&E's system at distribution voltages and the

¹ Application (A.) 24-11-007, *Application of Pacific Gas and Electric Company (U 39 E) for Approval of Electric Rule No. 30 for Transmission-Level Retail Electric Service*, November 21, 2024 (Application) at 5.

average cost for each piece of equipment. Use historical data and specify which historical range this average cost is derived from.

- i. Describe possible circumstances in which new transmission-level loads would trigger an upgrade to PG&E's distribution system to maintain grid operations and reliability.

ANSWER 005

- a. PG&E notes that, prior to Electric Rule 30, it did not categorize facilities as Facility Types 1-4. In addition, PG&E objects to this request as overbroad and burdensome as it would require PG&E to go back through eight years of project specific information and to try to separate into Facility Types the actual costs for project specific work. PG&E further objects because information regarding costs in 2014, example, will be dated given significant national and international inflationary trends, increases in commodity and equipment prices, and the potential for future tariffs or other federal or state actions that may significantly impact prices and thus is not relevant in this proceeding. Subject to and without waiving these objections and clarifications, PG&E Per Unit costs are available on the California Independent System Operator (CAISO) website. The spreadsheet has itemized costs for the typical Upgrades the PG&E identifies as part of interconnection studies.
<https://www.caiso.com/library/participating-transmission-owner-per-unit-costs>
- b. PG&E objects to this request as overbroad and burdensome as it would require PG&E to go back through eight years of project specific information and to try to identify the costs of Special Facilities, if any. PG&E further objects because information regarding costs in 2014, example, will be dated given significant national and international inflationary trends, increases in commodity and equipment prices, and the potential for future tariffs or other federal or state actions that may significantly impact prices and thus is not relevant in this proceeding. Subject to and without waiving these objections, please see PG&E's response to subpart (a).
- c. Please note that the following list only includes distribution upgrades at primary voltages. The distribution system is the portion of the electric system composed of distribution substation and primary line equipment that run at voltages from 4,000 volts to 34,500 volts. Customer-driven expansion of the distribution system would include some of the costs below. Any upgrades would be highly variable and dependent on customer load, customer location, and existing distribution asset capacity. The list below does not include costs for expansion of the secondary system. The secondary system is the low-voltage system comprised of voltages between 120 and 480 volts that directly serve homes and businesses. The list below also does not include costs such as metering. The following data was included in the 2023 General rate Case (GRC) and will be updated in the 2027 GRC filing.

Unit Cost and Forecast Details by Asset Type

Line No.	Description	Unit Cost	Per
1	New Substation Total	\$27,000,000	Substation
2	Construction	\$18,600,000	Substation
3	Regulatory	\$6,000,000	Substation
4	Land	\$2,400,000	5 Acre Parcel
5			
6	Substation Transformers	\$11,800,000	Transformer, = < 45 MVA with Switchgear
7		\$8,400,000	Transformer, = < 45 MVA Outdoor Bus, Install
8		\$6,500,000	Transformer, = < 45 MVA Outdoor Bus, Replace
9			
10	Circuit Switcher or Breaker	\$2,200,000	High Side Circuit Switcher or Circuit Breaker
11	Breakers	\$1,400,000	Low Side Circuit Breaker
12	Recable SF Circuit outlet in indoor substations	\$1,100	Foot
13			
14	Non-Bay		
15	OH New	\$160	Foot
16	OH Reconductor	\$160	Foot
17			
18	OH Capacitor (Cap)	\$33,000	Capacitor
19	OH Switch	\$30,000	Switch
20	OH SCADA Switch	\$45,000	Switch
21	OH Regulator	\$150,000	3 Regulator Bank
22	OH Recloser	\$80,000	Recloser
23	OH Fuse/Disconnect	\$10,000	Fuse/Disconnect
24	OH SCADA, no equipment replacement	\$15,000	Location
25	Reclocate Capacitor	\$18,000	Capacitor
26			
27	UG New w/trench	\$320	Foot
28	UG New no trench	\$260	Foot
29			
30	Service transformer replace	\$34,000	Service Transformer Replacement (blended overhead and underground)
31	Autotransformer	\$850,000	Autotransformer
32	UG Switch	\$80,000	Switch
33	UG SCADA Switch	\$130,000	Switch
34	UG Interrupter	\$120,000	Interrupter
35	PM Capacitor	\$65,000	Capacitor
36			
37	Bay		
38	OH New	\$220	Foot
39	OH Reconductor	\$220	Foot

Line No.	Description	Unit Cost	Per
40	OH New - SF Only	\$500	Foot
41	OH Reconductor - SF Only	\$500	Foot
42			
43	OH Capacitor (Cap)	\$33,000	Capacitor
44	OH Switch	\$30,000	Switch
45	OH SCADA Switch	\$45,000	Switch
46	OH Regulator	\$150,000	3 Regulator Bank
47	OH Recloser	\$80,000	Recloser
48	OH Fuse/Disconnect	\$10,000	Fuse/Disconnect
49	OH SCADA, no equipment replacement	\$15,000	Location
50	Relocate Capacitor	\$18,000	Capacitor
51			
52	UG New w/trench	\$410	Foot
53	UG New w/trench - SF Only	\$780	Foot
54	UG New no trench	\$315	Foot
55	UG New no trench - SF Only	\$600	Foot
56			
57	Service transformer replace	\$34,000	Service Transformer Replacement (blended overhead and underground)
58	Autotransformer	\$850,000	Autotransformer
59	UG Switch	\$80,000	Switch
60	UG SCADA Switch	\$130,000	Switch
61	UG Interrupter	\$120,000	Interrupter
62	PM Capacitor	\$65,000	Capacitor

(1) All regulators are purchased in MAT 06#, therefore unit costs identified here exclude the cost of material.

(2) Unit Costs are an average of recorded costs of similar work.

The only instance where new transmission-level loads would trigger an upgrade to PG&E's distribution system would be where new transmission-level loads cause the conversion of the transmission system from one transmission voltage to a higher transmission voltage. In that instance, any distribution substation transformers that are not capable of being served by the higher transmission voltage would require replacement with new substation transformers that can interconnect at the higher voltage.

APPENDIX C-8

1. PG&E Response to Cal Advocates Data Request No. 02, Question 05 served on February 4, 2025

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 - Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	CalAdvocates_002-Q005
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_002-Q005
Request Date:	January 22, 2025
Requester DR No.:	002
Requesting Party:	Public Advocates Office
Requester:	David Peck, Rachel Dersch, Emil Rodriguez, Christopher Hogan, Nathan Chau
Date Sent:	February 4, 2025
PG&E Witness(es):	Ben Moffat – Engineering, Planning and Strategy

SUBJECT: BARC FORMULA

QUESTION 005

Page 3-6 of PG&E's testimony provides assumptions for two illustrative examples of new customer connections under PG&E's proposed Rule 30. PG&E assumes Transmission Network Upgrades (Facility Type 4) costs are \$50 million¹ for both examples. These two examples also assume \$50 million in advances for Facility Types 1-3.

- a. What is the basis for the assumption of \$100 million to connect new customers in each of these examples? Please provide any supporting information.
- b. What is the basis for this split in costs between Facility Types 1-4? Is this based on previous exceptional case filings? If so, please provide supporting documentation.

ANSWER 005

- a. The basis of the assumptions came from data available to PG&E including estimates from Preliminary Engineering Studies and Project Management and Engineering input. The table below provides data for six projects that were used in developing PG&E's estimate of \$50 million for Facility Types 1-3 and \$50 million for Facility Type 4. The total average costs for Facility Types 1-3 summed up to be \$46,375,000 in which we rounded up to \$50,000,000 and Facility Type 4 averages \$50,875,000 in which we rounded down to \$50,000,000.

¹ PG&E Testimony, Page 3-6.

	Facility Type	Project 1	Project 2	Project 3	Project 4	Project 5	Project 6	Average
1	Transmission Service Facilities	\$4,000,000	\$5,500,000	\$2,500,000	\$15,500,000	\$12,500,000	\$5,500,000	\$7,583,333
2	Transmission Interconnection Upgrades	\$8,000,000	\$6,000,000	\$12,000,000	\$4,500,000	\$12,500,000	\$6,000,000	\$8,166,667
3	Transmission Interconnection Network Upgrades	\$45,500,000	\$16,000,000	\$38,000,000	N/A	N/A	\$23,000,000	\$30,625,000
4	Transmission Network Upgrades	\$113,000,000	\$39,000,000	\$12,500,000	N/A	N/A	\$39,000,000	\$50,875,000

- b. PG&E understands that subpart (b) is asking how the costs for each Facility Type was estimated for purposes of the examples on page 3-6 of PG&E's testimony. Please see subpart (a) for the basis for this split in costs between Facility Types 1-4.

APPENDIX C-9

1. PG&E Response to Cal Advocates Data Request No. 01, Question 01 served on January 23, 2025

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 - Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	CalAdvocates_001-Q001
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_001-Q001
Request Date:	January 8, 2025
Requester DR No.:	Cal Advocates 01 – PG&E
Requesting Party:	Public Advocates Office
Requester:	Jane Roschen
Date Sent:	January 23, 2025
PG&E Witness(es):	Karen Khamou Ornelas – Engineering, Planning and Strategy

SUBJECT: GENERAL QUESTIONS

QUESTION 001

On page 1-12 of PG&E's testimony,¹ PG&E proposes to include interest payments on monetary advance refunds to Rule 30 customers. Does PG&E provide additional interest payments on refunds of advances for non-residential customers that connect under Rules 15 and 16?

- a. If not, why is PG&E proposing to provide these additional interest payments to Rule 30 customers and not customers connecting to service under rules 15 and 16?
- b. In the Application, PG&E proposes “to establish a new memorandum account in which it could record any interest paid to a transmission-level customer for refunds on advances and/or actual cost payments associated with facilities that are included in CPUC-jurisdictional rates.” In its Application, PG&E also states: “[f]or Federal Energy Regulatory Commission (FERC)-jurisdictional rates, PG&E’s current Transmission Owner Formula Rate includes a mechanism to recover interest paid on customer advances.”² Please explain if transmission-level customers for any type of facility addressed in the Application³ will involve FERC-jurisdictional rates to recover interest paid.
- c. When would PG&E begin to record and recover interest paid to a transmission-level customer in the proposed memorandum account?⁴

¹ *Pacific Gas and Electric Company Application for Approval of Electric Rule No. 30 for Transmission-Level Retail Electric Service Prepared Testimony* (PG&E Testimony), “Chapter 1: Overview of Proposed Electric Rule 30 and Implementation,” at 1-12.

² Application (A.) 24-11-007, *Application of Pacific Gas and Electric Company (U 39 E) for Approval of Electric Rule No. 30 For Transmission-Level Retail Electric Service* (Application) at p. 19, fn. 39.

³ Application, at p. 8-9; Attachment A (Electric Rule No. 30) at p. 6, Figure 1.

⁴ Application at p. 18.

ANSWER 001

- a. PG&E does not pay interest for advances provided by an Applicant under Electric Rules 15/16.

There are a number of key differences between Electric Rules 15/16 and Electric Rule 30 that support including interest under Electric Rule 30 for advances and actual costs payments. First, as a preliminary matter, it is likely that interconnections under Electric Rule 30 will cost substantially more than interconnections under Electric Rules 15/16. Given the substantial outlay under Electric Rule 30 for an initial advance and actual cost payments, which may not be eligible for refund for several years, providing interest on these outlays is just and reasonable.

Second, under Electric Rules 15/16, an Applicant is not required to advance the full cost of upgrades needed to interconnect the Applicant. This is because Electric Rules 15/16 provide allowances, which reduce the advance amount and, in some cases, may not require the Applicant to pay any advance. On the other hand, Electric Rule 30 does not provide any allowances for Applicants. Therefore, Applicants must provide an advance and/or make actual cost payments for the full costs of Transmission Service Facilities, Transmission Interconnection Upgrades, and Transmission Interconnection Network Upgrades.

Third, Electric Rule 30 requires Applicant's to pay the actual costs for Transmission Service Facilities, Transmission Interconnection Upgrades, and Transmission Interconnection Network Upgrades, while Electric Rules 15/16 do not require Applicants to pay the actual costs of interconnection for non-mixed fuel use facilities.⁵ Under Electric Rules 15 and 16, customers provide an advance based on estimated costs. Actual costs can be higher than estimates and thus Applicants under Electric Rule 30 may be required to pay more upfront before any potential refunds.

Finally, in developing Electric Rule 30, PG&E considered the Large Generator Interconnection Agreement (LGIA) approved by the Federal Energy Regulatory Commission (FERC). The LGIA is similar to Electric Rule 30 in that LGIA customers can be required to provide a substantial outlay for Network Transmission Upgrades in advance of interconnection. In addition, under the LGIA, customers are required to pay for the actual costs of the Network Transmission Upgrades. Under the LGIA, customers can be refunded the advance and/or actual cost payments after energization and are paid interest on these advances and actual cash payments when the amount is refunded.⁶

- b. Costs incurred under Electric Rule 30 may be recovered either through FERC-jurisdictional transmission rates or California Public Utilities Commission (CPUC)-jurisdictional rates. Under PG&E's Transmission Owner (TO) Tariff, costs are

⁵ Pursuant to Decision 23-12-037, new construction that includes mixed fuel use must pay actual costs. See D.23-12-037, Ordering Paragraph 3.

⁶ See e.g., LGIA, California Independent System Operator (CAISO) Tariff, Appendix U, Section 3.4.3.

recovered for transmission facilities that are under the CAISO's operational control.⁷ To the extent any transmission facilities constructed under Electric Rule 30 are under the CAISO's operational control, the costs for these facilities, including any corresponding interest, will be recovered through FERC-jurisdictional rates. For facilities that are not under the CAISO's operational control, the costs of these facilities, including interest, will be recovered through CPUC-jurisdictional rates. The memorandum account proposed by PG&E would only be used to recover interest associated with costs that are recovered through CPUC-jurisdictional rates.

- c. PG&E would record into the memorandum account interest payments for costs associated with CPUC-jurisdictional facilities as the payments are made to the Applicant through the refund process. The costs recorded in the memorandum account would be reviewed by the Commission either through an advice letter or application process and, once approved by the Commission, would be recovered by PG&E in CPUC jurisdictional rates. PG&E does not expect to establish the memorandum account and start recording costs until it receives Commission approval to do so in this proceeding, either in a final decision or an order on interim implementation.

⁷ PG&E TO Tariff, Sections 1 and 3.50.

APPENDIX C-10

1. PG&E Response to Cal Advocates Data Request No. 02, Question 01 served on February 4, 2025

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 - Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	CalAdvocates_002-Q001
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_002-Q001
Request Date:	January 22, 2025
Requester DR No.:	002
Requesting Party:	Public Advocates Office
Requester:	David Peck, Rachel Dersch, Emil Rodriguez, Christopher Hogan, Nathan Chau
Date Sent:	February 4, 2025
PG&E Witness(es):	Ben Moffat – Engineering, Planning and Strategy

SUBJECT: BARC FORMULA

QUESTION 001

PG&E states that refunds described are calculated using PG&E's Base Annual Revenue Calculation (BARC) review process.¹

- a. Please describe in detail the origins of the BARC formula.
- b. What is the BARC formula designed to achieve?
- c. What other variations of the BARC formula have been proposed or utilized by PG&E in the past?
- d. If PG&E previously proposed or utilized alternative BARC formula iterations, please explain why the current iteration of the BARC formula was ultimately proposed for this Application over the other alternatives.
- e. PG&E uses the Monthly PG&E Financed, Cost of Ownership Transmission Factor from Rule 30 to determine PG&E's cost-of-service factor (CoSF). Did PG&E consider alternative methods to determine the CoSF? If not, is this factor used in other cost allocation processes at PG&E?

ANSWER 001

- a. The BARC formula was developed in response to Commission Decision (D.) 94-12-026. As the Commission explained in D.15-06-045, Finding of Fact 7:

PG&E persuasively identifies factors that are logical and consistent with the revenue-based approach that underlies D.94-12-026: the point of the BARC review is to assess whether additional revenue supports any refunds, and not to pay refunds for the same revenue year after

¹ PG&E Testimony, page 1-10.

year; focus on permanent load serves to harmonize Rule 15.E.5 with other Rule 15 provisions, such as 15.C.1 through 15.C.4; the comparative approach integrates Rule 15.E.5 with other Rule 15 provisions, both gas and electric, so that same approach determines both non-residential refunds and the deficiency payments due from an applicant when actual net revenue falls short of what was anticipated and does not support the allowance previously granted.

In addition, for non-residential customers, Electric Rule 15.E.3b provides that “PG&E shall be responsible to review Applicant’s actual base annual revenue for the first three years from the date PG&E is first ready to serve. Applicant shall be responsible for notifying PG&E if new, permanent load is added the fourth through tenth year from the date PG&E is first ready to serve. Such review shall determine if additional revenue supports any refunds to Applicant.”

- b. In the context of Electric Rule 15, as the Commission indicated in D.15-06-045, Finding of Fact 7, “the point of the BARC review is to assess whether additional revenue supports any refunds” The purpose of the BARC Formula is to determine whether the customer generated sufficient revenue to either meet any allowance granted per Electric Rule 15 or, if the customer chose the 10-year payment option, receive a refund of any refundable advance available. In the context of Electric Rule 30, PG&E is proposing to use the BARC process to determine if customers are eligible for refunds for Advances and Actual Cost Payments provided for Facility Types 1-3 based on the Net Revenue of the transmission level customer. See PG&E Prepared Testimony at 2-12, line 26 to 2-14, line 25.
- c. There has only been one scenario where PG&E has used another variation of the BARC Formula: Customers billed for solar (i.e. Net Metering) where we had to incorporate the fact that the customer’s bills are trued-up every 12 months. In addition, consistent with D.23-12-037, PG&E has eliminated subsidies for new mixed-fuel construction, including elimination of the BARC process altogether for these customers. See D.23-12-037 at 1.
- d. Please see subpart (c) above.
- e. PG&E utilizes the annualized PG&E-financed Cost of Ownership Distribution Factor stated in Rule 2 for Electric Rules 15 and 16 BARC reviews. For purposes of Electric Rule 30, PG&E did consider utilizing the distribution factor; however, we determined that it was more appropriate to utilize the annualized PG&E-financed Cost of Ownership Transmission Factor (or charge) because Electric Rule 30 addresses transmission level interconnections.

APPENDIX C-11

1. PG&E Response to Cal Advocates Data Request No. 04, Question 01 served on February 28, 2025

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 - Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	CalAdvocates_004-Q001
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_004-Q001
Request Date:	February 21, 2025
Requester DR No.:	004
Requesting Party:	Public Advocates Office
Requester:	Jane Roschen
Date Sent:	February 28, 2025
PG&E Witness(es):	Mike Settemire – Engineering, Planning and Strategy

SUBJECT: EXISTING PROCESS

QUESTION 001

Describe PG&E's process to issue refunds to new customers under Electric Rule 30. In other words, when PG&E determines that a customer should receive a refund per the BARC formula, how would PG&E make the refund? How is the refund received by the customer?

ANSWER 001

PG&E's BARC review process for Electric Rule 30 is modeled on the BARC review used for Electric Rule 15. Since PG&E has not yet implemented Electric Rule 30 (pending Commission approval of interim implementation and/or Electric Rule 30), this response provides an overview of the BARC review process for Electric Rule 15. Under Electric Rule 15, upon the initiation by means of payment and signature for a new construction contract, and for one that has a Refundable Advance, the refundable advance portion of the payment is recorded in a Liability Account where it will reside until the customer generates sufficient revenue, based upon demand usage, through the BARC Review process.

When a refund is determined by the BARC Review, the liability account is debited for that amount and the refund is issued to the customer.

Please note that the Refundable Advance is subject to Cost of Ownership pursuant to the language used in Electric Rule 15 which is based on Electric Rule 2. Any accrued Cost of Ownership would be applied to the amount of the refund and any balance left would be the amount paid to the customer.

Finally, if interim implementation is granted and/or the Commission approves Electric Rule 30, please refer to Electric Rule 30.D.5 regarding the timing for the payment of refunds.

APPENDIX C-12

1. PG&E Response to Cal Advocates Data Request No. 010, Question 012 served on June 3, 2025

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 - Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	CalAdvocates_010-Q012
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_010-Q012
Request Date:	May 20, 2025
Requester DR No.:	010
Requesting Party:	Public Advocates Office
Requester:	Kimiko Akiya/Jane Roschen
Date Sent:	June 3, 2025
PG&E Witness(es):	Mike Settlemire – Engineering, Planning and Strategy

SUBJECT: PG&E'S RESPONSE TO REVISED CAL ADVOCATES DR06 Q03

On May 14, 2025, PG&E provided a data request response which included the Excel file *ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_006-Q003Rev01Atch01CONF*.

BARC Process

Question 012

Provide an example of the BARC formula being used for a distribution commercial customer in Electric Rule No. 15, where the BARC is used to determine both the 1) allowance granted per Electric Rule No. 15, and the 2) yearly refunds issued to the customer on the portion of the project costs which are refundable under the 10-year payment option.¹

- a. Explain the "deficiency payments" described in this statement of PG&E's Supplemental Testimony:

"that same approach determines both non-residential refunds and the deficiency payments due from an applicant when actual net revenue falls short of what was anticipated and does not support the allowance previously granted."²

Answer 012

For clarification, the language quoted by Cal Advocates is from a CPUC Decision cited in PG&E's Supplemental Testimony. See Decision 15-06-045, Finding of Fact 7. In responding to this request, PG&E is not providing a definitive interpretation of what the Commission meant when it used this phrase. Subject to and without waiving this

¹ See Electric Rule 15.C.4; Electric Rule 15.E.3

² Supplemental Testimony at 47, lines 16-19

clarification, under Electric Rule 15, PG&E calculates an allowance based on estimated load on the new service. An example of the allowance calculation is provided below.

Total Base Revenue is the amount of distribution revenue expected to be generated by the customer over 12 months.

PG&E converts the Total Base Revenue to an allowance by using the formula from Rule 15 Net Revenue/COSF. Since ITCC tax is applicable that is added to the total.

Allowances

Residential:

\$0.00	X	0	=	\$0.00
Allowance		Lots / Units		

plus ITCC @ 24%	Residential Allowances	(+)	\$0.00
-----------------	------------------------	-----	--------

SUB TOTAL Residential Allowances	(=)	\$0.00
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Non-Residential: \$97.86	/	0.1476	=	\$663.00
Net Annual Revenue		Cost-of-Service-Factor		

plus ITCC @ 24%	Non-Residential Allowances	(+)	\$159.12
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SUB TOTAL Non-Residential Allowances	(=)	\$822.13
--------------------------------------	-----	----------

less Residential Service Allowance:

(0	X	\$0.00) + 24% =	\$0.00
Lots/Units		Ave. Cost / Unit	ITCC	

Total Distribution Line Extension Allowance	(=)	\$822.13
---	-----	----------

Amount Subject to Refund

Engineering & Administrative Costs	\$2,270.89
------------------------------------	------------

Including Applicant Design Value of	\$0.00
-------------------------------------	--------

Tie-In of Distribution by PG&E	(+)	\$317.68
--------------------------------	-----	----------

Electric Metering (Non-Residential Projects)	(+)	\$176.80
--	-----	----------

Other Taxable charges (N/A)	(+)	\$0.00
-------------------------------	-----	--------

PG&E installed - Cost of Distribution Line and Non-Res Svcs.	(+)	\$1,236.95
--	-----	------------

Applicant installed - Cost of Distribution Line and Non-Res Svcs.	(+)	\$0.00
---	-----	--------

Value of Distribution Substructures	(+)	\$0.00
-------------------------------------	-----	--------

Inspection Fees	(+)	\$0.00
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SUB TOTAL	(=)	\$4,002.32
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Including Net Joint Pole Credit Value of	\$0.00
--	--------

plus ITCC @ 24%	(+)	\$960.55
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Total Refundable Amount	(+)	\$4,962.88
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Less Total Allowances (not to exceed Total Refundable Amount)	(-)	\$822.13
---	-----	----------

Balance: Net Refundable Amount	\$4,140.74
--------------------------------	------------

10 Year Refundable Advance Option

Balance: Net Refundable Amount	\$4,140.74
--------------------------------	------------

Less Credit for Value of Applicant Design Work	\$0.00
--	--------

Less Cost of Dist. Line Ext. and Non-Res Svcs. installed by Applicant	\$0.00
---	--------

Less Distribution Substructures by Applicant	\$0.00
--	--------

Net 10 Year Refundable Advance Option Amount	\$4,140.75
--	------------

Non-Refundable Discount Option

Balance: Net Refundable Amount	\$4,140.74
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less Discount	\$4,140.74	X	0.50	=	(-)	\$2,070.37
	Balance		Discount Rate			

Less Credit for Value of Applicant Design Work	\$0.00
--	--------

Less Cost of Dist. Line Ext. and Non-Res Svcs. installed by Applicant	\$0.00
---	--------

Less Distribution Substructures by Applicant	\$0.00
--	--------

Net Non-Refundable Discount Option Amount	\$2,070.37
---	------------

The Net Revenue is entered into the contract tool which calculates an applicant's allowance. Please note the deviation between the allowance on the estimate and the amount on the contract is due to a difference in decimal points used in each tool:

The first BARC review is performed 12 months from the date PG&E energized the service. PG&E uses the same formula used to calculate the allowance to make a comparison between estimated revenue and actual revenue:

The second year review is performed 12 months after the first review and so on up to the third and final mandatory review. At the end of three BARC reviews, PG&E performs a true up to see if the customer met the allowance and if we need to collect an additional payment (*i.e.*, a deficiency payment) should the customer fail to generate the expected revenue. For years 4 through 10, PG&E will only perform a BARC Review if the customer submits a formal request for PG&E to do so.

For refunds, the customer revenue is compared to the yearly allowance, and should the customer generate revenue that exceeds the expected threshold a refund will be issued from the Liability Account where there is Refundable Advance has been posted. The customer can only be refunded the refundable advance paid by the customer as part of its upfront contract payment. Also, should the customer still have remaining advance after 12 months then PG&E will start accruing Monthly Cost of Ownership on the remaining balance until the next refund becomes eligible at which time the accrued amount will be deducted from the refund.

APPENDIX C-13

1. PG&E Response to Cal Advocates Data Request No. 010, Question 010 served on June 03, 2025

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 - Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	CalAdvocates_010-Q010
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_010-Q010
Request Date:	May 20, 2025
Requester DR No.:	010
Requesting Party:	Public Advocates Office
Requester:	Kimiko Akiya/Jane Roschen
Date Sent:	June 3, 2025
PG&E Witness(es):	Adam Soto – Engineering, Planning and Strategy

SUBJECT: PG&E'S RESPONSE TO REVISED CAL ADVOCATES DR06 Q03

On May 14, 2025, PG&E provided a data request response which included the Excel file *ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_006-Q003Rev01Atch01CONF*.

BARC Process

QUESTION 010

Identify where in Proposed Rule 30 PG&E identifies that Refunds will be based on actual revenues, and not the forecasted revenues used in PG&E's BARC calculation in Workpaper 1 of the Application.¹

ANSWER 010

Proposed Rule 30, Section D.4.a states that "PG&E will calculate Refunds, if any, for the first three calendar years of the Refund Period using the Base Annual Revenue Calculation." Section G, defines Base Annual Revenue Calculation (BARC) and Net Revenue, specifying that the BARC calculation will use the applicant's actual energy bill revenues. See below.

BASE ANNUAL REVENUE CALCULATION or BARC: The amount calculated using the retail electric components of the Applicant's energy bill for the one-year period following the commencement of the Refund Period using the following formula:

¹ Electric Rule.D.1 in Supplemental Testimony, at AtchA-7.

NET REVENUE: That portion the total rate revenues that supports the Transmission Facilities. The term Net Revenues excludes items such as energy, public purpose programs, non-bypassable charges, revenue cycle services, and other revenues that do not support the Transmission Facilities costs.

APPENDIX C-14

1. PG&E Response to Cal Advocates Data Request No. 011, Question 15, served on June 12, 2025

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 - Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	CalAdvocates_011-Q015
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_011-Q015
Request Date:	May 30, 2025
Requester DR No.:	011
Requesting Party:	Public Advocates Office
Requester:	Jane Roschen, Emil Rodriguez, David Peck, Sanya Kwatra
Date Sent:	June 12, 2025
PG&E Witness(es):	Ben Moffat – Engineering, Planning and Strategy

QUESTION 015

Tables 6 and 7 of PG&E's Supplemental Testimony provide illustrative examples of the Refunds¹ provided to Proposed Rule 30 customers under the Base Annual Revenue Calculation (BARC) process over the Refund Period.² In these examples, does PG&E assume that interest is included in the Refund amount?

ANSWER 015

Tables 6 and 7 of PG&E's Supplemental Testimony do not include interest in the refund amount.

-
- 1** The term "Refund" refers to the portion of the Advance, Contributions and/or Actual Cost Payments that the customers were paid back for in the illustrative example by PG&E. See PG&E Supplemental Testimony at 50-51. Also see Proposed Rule 30 definitions in Attachment A at AtchA-18 and AtchA-19.
- 2** The term "Refund Period" refers to "the first full calendar year after the Transmission Facilities go into service and shall last for ten (10) years." See PG&E Application section, Definitions for Rule 30, at 17.

APPENDIX C-15

1. PG&E Response to Cal Advocates Data Request No. 04, Question 14, serve February 21, 2025
2. Declaration Supporting Confidential Designation on Behalf of PGE

1. PG&E Response to Cal Advocates Data Request
No. 04, Question 14, serve February 21, 2025

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 - Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	CalAdvocates_004-Q014
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_004-Q014
Request Date:	February 21, 2025
Requester DR No.:	004
Requesting Party:	Public Advocates Office
Requester:	Jane Roschen
Date Sent:	February 28, 2025
PG&E Witness(es):	Jon Bradshaw – Engineering, Planning and Strategy

SUBJECT: DATA CENTERS AND PG&E SYSTEM LOADS

QUESTION 014

Describe the procedural and one-time steps taken by PG&E to submit load forecasts for large load customers to:

- a. The California Public Utilities Commission (CPUC),
- b. The California Independent System Operator (CAISO),
- c. And the California Energy Commission (CEC).

ANSWER 014

PG&E understands that this data request is asking whether PG&E has submitted to the CPUC, CAISO, and/or CEC load forecasts for individual large load customers, as compared to load forecasts for PG&E's service territory generally. With this clarification:

- a) PG&E has not submitted load forecasts to CPUC for individual large load customers.
- b) PG&E has not submitted load forecasts to CAISO for individual large load customers.
- c) PG&E has not submitted load forecasts to the CEC for individual large load customers. However, in response to an informal request for information from the CEC to support the 2024 IEPR California Energy Demand forecast, PG&E has provided the CEC with information about data center applications from our interconnection queue and inquiries. This information comprised of:
 - i. In September 2024: Aggregated capacity ramp schedules for a subset of data center projects

- ii. In December 2024: A refresh of the information shared in September 2024
- iii. In February 2025: For a subset of data center projects, (1) individual data center projects' capacity ramp schedule, as submitted by customers in their interconnection applications, and (2) their respective busbar identification. For another subset of applications, PG&E provided aggregated capacity ramp schedules separately for San Francisco Bay Area and Central Valley.

2. Declaration Supporting Confidential Designation on
Behalf of PGE

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

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION
ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

1. I, Michael Medeiros, am a/the VP of South Bay Delivery at Pacific Gas and Electric Company (“PG&E”), a California corporation. My business office is located at:

Pacific Gas and Electric Company
300 Lakeside Dr.
Oakland, CA 94612

2. PG&E will produce the information identified in Paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.

Name or Docket No. of CPUC Proceeding (if applicable): Application 24-11-007

3. Title and description of document(s): PG&E’s Response to Energy Division’s Dec. 19, 2024 Questions Regarding A.24-11-007
-

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart, with further detail provided in Appendix A, which is incorporated into this declaration:

Check	Basis for Confidential Treatment	Where Confidential Information is Located on the Documents
<input checked="" type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data.</p> <p>(Protected under Pub. Util. Code § 8380; Civ. Code §§ 1798 <i>et seq.</i>; CPUC Decisions (D.) 14-05-016)</p>	<p>2025-01-10_ED-Q005_Attachment_Tranmission_Level_Interconnection_CONF</p>
<input type="checkbox"/>	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver's license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual.</p>	<p>(Protected under Civ. Code §§ 1798 <i>et seq.</i>; Gov. Code § 7927.400; 42 U.S.C. § 1320d-6; General Order (G.O.) 77-M; see also CPUC D. 04-08-055, 06-12-029)</p>
<input type="checkbox"/>	<p>Physical facility, cyber-security sensitive, or critical infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113 and/or General Order 66-D (“The subject information: (1) is not customarily in the public domain by providing a declaration in compliance with Section 3.2(c) stating that the subject information is not related to the location of a physical structure that is visible with the naked eye or is available publicly online or in print; and (2) the subject information either: could allow a bad actor to attack, compromise or incapacitate physically or electronically a facility providing critical utility service; or discusses vulnerabilities of a facility providing critical utility service”).</p>	<p>(Protected under Gov. Code § 7927.705, 7929.205; 6 U.S.C. § 671; 6 CFR § 29.2)</p>
<input type="checkbox"/>	<p>Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data.</p>	<p>(Protected under Civ. Code §§ 3426 <i>et seq.</i>; Gov. Code §§ 7927.300, 7927.705, 7929.420, 7927.605, 7930.205; Evid. Code §1060; CPUC D.11-01-036)</p>
<input type="checkbox"/>	<p>Corporate financial records.</p>	<p>(Protected under Gov. Code §§ 7927.705, 7927.605)</p>
<input type="checkbox"/>	<p>Third-Party information subject to non-disclosure or confidentiality agreements or obligations.</p>	<p></p>

(Protected under Gov. Code § 7927.705; see, e.g., CPUC D.11-01-036)

X

Other categories where disclosure would be against the public interest.

(Gov. Code § 7922.000)

The attachment is a confidential internal procedure regarding our processes for large load customer interconnections

2025-01-10_ED-
Q006c_Attachment_TD-
9101P_CONF

5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
7. Executed on this 10st day of January, 2025 at Oakland, California.

/s/ Michael Medeiros
Michael Medeiros

VP, South Bay Delivery

Pacific Gas and Electric Company

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

Application 24-11-007
ATTACHMENT TO DECLARATION
January 10, 2025

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
ED Q005 Attachment	2025-01-10_ED-Q005_Attachment_Transmission_Level_Interconnection_CONF.xlsx	Customer-specific data, which may include demand, loads, names, addresses, and billing data	Gray Shaded areas in the Excel file
ED Q006c Attachment	2025-01-10_ED-Q006c_Attachment_TD-9101P_CONF.pdf	Other categories where disclosure would be against the public interest.	PDF file in its entirety

APPENDIX C-16

1. PG & E Response to Energy Division Data Request NO. 01, Follow-Up Question 6c, served on January 10, 2025.
2. Attachment - [REDACTED] **CONFIDENTIAL**
3. PG&E declaration claiming confidentiality

1. PG & E Response to Energy Division Data Request
No. 01, Follow-Up Question 6c, served on
January 10, 2025.

**Energy Division's December 19, 2024 Follow-Up Questions
Regarding Electric Rule 30 Application**

- 1. Original Question: Provide the dates of meetings with stakeholders and summaries of discussions. Were any issues unresolved?**

Follow-up Question: Please provide the slide deck and meeting summary for each meeting and its follow-up to include the attendees and discussion topics.

Attachments *2025-01-10_ED Q001_Attachment_MeetingMaterials.pdf* and *2025-01-10_ED Q001_Attachment_MeetingSummaries.pdf* contain the slide decks and meeting summaries, respectively, for the following meetings:

	Date	Participants	Meeting Materials
1	09/03/2024	Southern California Edison Company (SCE) and San Diego Gas & Electric Company (SDG&E)	Y
2	09/10/2024	Energy Division	Y
3	09/16/2024	Cal Advocates and The Utility Reform Network (TURN)	Y
4	09/23/2024	Transmission Level Customers	Y
5	10/03/2024	Federal Energy Regulatory Commission (FERC) Staff	Y
6	10/11/2024*	Energy Division (follow-up)*	Y
7	10/24/2024	Transmission Level Customers (follow-up)	Y
8	10/28/2024	Energy Division (follow-up)	Y
9	10/30/2024	SCE and SDG&E (follow-up)	Y
10	12/11/2024	Cal Advocates and TURN	Y

*In PG&E's response to Energy Division submitted December 17, 2024, PG&E inadvertently omitted the October 11, 2024 Energy Division meeting—which had no unresolved issues.

- 2. Original Question: Did PG&E identify a tariff used by any other U.S.-based utility (or in development by) that addressed retail transmission for non-residential customers?**

(No follow-up question from Energy Division)

- 3. Original Question: Provide examples of exceptional case filings (as noted at page 14 of the Application).**

Follow-Up Question: Please provide a list of other exceptional case filings in addition to the two footnoted on page 14 of your Application.

Please see the below table for exceptional case filings:

Advice Number	Subject	Date Filed	Disposition Date	Status
7281-E	Agreement With Signature Homes, Inc. for Relocation of PG&E's Facilities, in Accordance With Electric Rule No. 15.I.3, the Exceptional Cases Provision	5/24/2024		Pending
7224-E	Agreement With MCD - North Stockton, LLC for Relocation of PG&E's Facilities, in Accordance With Electric Rule No. 15.I.3, the Exceptional Cases Provision	8/22/2024		Pending
6975-E*	Electric Rule 13 Exceptional Case Submittal for Electric Transmission Service Facilities to Santa Clara Valley Transit Authority ("VTA"), in Accordance with General Order 96-B, Section 9.2.3.	6/29/2023	7/11/2024	Approved
5848-E*	Electric Rule 15/16 Exceptional Case Submittal for Santa Teresa Substation	6/18/2020	5/12/2021	Approved
3990-E	Electric Rule 15/16 Exceptional Case Agreement for Plains Exploration and Production Company	1/12/2012	4/25/2012	Approved
3383-E	Electric Rule 15/16 Exceptional Case Line Extension Agreement for Nevada County	12/19/2008	2/27/2009	Approved
3369-E	Electric Rule 15/16 Exceptional Case Agreement for the East Bay Municipal	11/24/2008	1/8/2009	Approved

Advice Number	Subject	Date Filed	Disposition Date	Status
	Utilities District Camanche Pumping Plant			
2938-E	Request for Exceptional Case Treatment to Allow an Overhead Line Extension to Serve the Community of Scotia in Humboldt County	11/28/2006	1/12/2007	Approved
2824-E	Electric Distribution Agreement to Perform Tariff Scheduled Related Work Exceptional Case Agreement for City and County of San Francisco	5/8/2006	6/8/2006	Approved
2641-G/ 2674-E	Line Extension Agreement for Kern County Water Agency	6/14/2005	7/13/2005	Approved

*denotes the two exceptional case filings referenced on Page 14, Footnote 27 of PG&E's Application

4. **Original Question: Provide a spreadsheet showing the 34 applications received since 2023 (and any new ones), the business, type of business, the location, which transmission line will serve the load, what the line voltage is, the load curve for the business, and if the project includes mixed-fuel use.**
5. **Original Question: What is PG&E's expected scale for Rule 30 demand and energy?**

Follow-Up Question 4a and 5a: Please provide an update to the confidential list of interconnection applications received since 2023 on or before January 10, 2025.

Please see Confidential Attachment *2025-01-10_ED-Q005_Attachment_Transmission_Level_Interconnection_CONF.xlsx*.

Please note that Attachment “2025-01-10_ED-Q005_Attachment_Transmission_Level_Interconnection_CONF.xlsx.” contains confidential, customer specific information that should not be distributed or shared outside the Commission. Follow-Up Question 4b and 5b: Please provide a more detailed forecast of data center load when the analysis is complete. Please provide an update on your progress by January 10, 2025.

PG&E's forecast is in development, and we expect it will be ready by approximately April 15, 2025.

Follow-Up Question 4c and 5c: Please provide an update on the status of PG&E's datacenter demand forecast in the IEPR.

PG&E's understanding is that the California Energy Commission's (CEC) development of the IEPR forecast is underway and is scheduled to be finalized in January 2025.

6. Original Question: Is PG&E's electric system expansion planning and expansion processes prepared to successfully serve the Rule 30 expected needs?

Follow-Up Question 6a: Please provide more information about the Cluster Study Process in Santa Clara and Alameda Counties.

In 2024, PG&E piloted a cluster study approach to study the increased number of data center applications received in the San Francisco South Bay area, mainly in Santa Clara and Alameda counties ("Pilot Cluster Process"). The clustering of large data center applications in certain areas and studying them in a serial process created complex, high-cost interconnection, and capacity upgrades. When projects are studied serially, the study timelines are lengthy and often do not study the cumulative impacts of the total load in a geographic area.

PG&E's Pilot Cluster Process is a streamlined approach for handling applications for large data center loads within a specific geographic area, allowing customers to submit applications and be grouped based on their proximity to PG&E's transmission and distribution system. We also offered customers with active or previously completed applications the chance to restudy, downsize, or change their project's Point of Interconnection within the same calendar year. Customer Engagement Meetings have been or will be held during the Pilot Cluster Process to provide each customer a dedicated meeting where PG&E and the customer can discuss feasible connection options, available capacity, land, permitting, and planned capacity projects. This helps customers make informed decisions about proceeding with or withdrawing their applications.

The Pilot Cluster Process also sets clear timelines and procedures for study milestones, customer engagement, and project initiation. Customers will be informed about the expected scope, costs, and duration of their project during the application phase. The Pilot Cluster Process aims to produce meaningful results that consider system capabilities and establish shared cost allocation and responsibility, supporting the development of a consolidated engineering and implementation plan.

Follow-Up Question 6b: Please share your lessons learned from the [Cluster Study] Process.

Lessons learned from the Pilot Cluster Process are still being gathered and understood for implementation in 2025. PG&E is in the process of conducting post-cluster interviews with participating customers to understand what worked well and what could be improved for the next iteration. Some initial lessons learned include:

- Simplify and standardize study information and results presented to customers.
- Including multiple subject matter experts early in the process to identify the best near-term and long-term solutions to meet customer needs.
- Early engagement with customers on participating in potential load management solutions that can mitigate the need for long-lead capacity upgrades
- Standardizing the study format and including tariff cost allocation information to help customers make informed decisions.

Follow-Up Question 6c: Please provide a copy of your Large Load Interconnection Process documents (current versions).

Please see Confidential Attachment *2025-01-10_ED-Q006c_Attachment_TD-9101P_CONF.pdf*.

Please note that Attachment “2025-01-10_ED-Q006c_Attachment_TD-9101P_CONF.pdf” contains internal processes that should not be distributed or shared outside the Commission. Original Question: Explain (in a few examples) how the new load would lower rates or be agnostic with respect to rates for all customers.

Follow-Up Question: Please ensure that the most current version of the service list is used to share documents. In addition, consider adding the participants from your stakeholder meetings to the distribution list you use when emailing the service list.

PG&E confirms receipt of Energy Division’s feedback above regarding service list.

8. **Original Question: Provide a copy of the Base Annual Revenue Calculation (BARC) showing redline changes.**

(No follow-up question from Energy Division)

9. **Original Question: What was the basis for the development of the refund process – what was it benchmarked against?**

(No follow-up question from Energy Division)

- 10. Original Question: Are there other ways in which these loads could be served? Do you provide advice to the prospective customer?**

Follow-Up Question: Please provide your response to Question 10 or an update on your progress by January 10, 2025.

When a customer with significant electric demand applies for service, PG&E's Service Planning team and other internal stakeholders work with the customer on the best solutions to serve the customer's requested load. PG&E's Service Planning and Transmission and Distribution Planning teams work closely with large load customers to perform preliminary engineering, provide customers with cost estimates for interconnection, work with the customer on the best options for interconnection, and potential interim bridging solutions.

- 11. Original Question: Your GRIP portal provides information to potential customers of new distribution load. Do you have a similar portal for transmission lines with available capacity for new retail, transmission-level customers?**

Follow-Up Question: Please provide your response to Question 11 or an update on your progress by January 10, 2025.

PG&E does not currently have a similar portal for transmission lines with available capacity for new retail, transmission-level customers. PG&E's Grid Resource Integration Portal (GRIP) displays transmission lines and planned transmission projects but does not yet provide data on available capacity.

- 12. Original Question: Is there any difference between how service extensions would be handled for distribution customers and for retail transmission customers in terms of downstream tapping of a line built by another customer?**

Follow-Up Question: Please provide your response to Question 12 or an update on your progress by January 10, 2025.

Connecting new load at distribution voltage level is much easier than transmission-level interconnections since distribution interconnections are typically a radially fed system from a PG&E substation, which keeps protection of the distribution circuit simple and straight forward generally. However, at PG&E transmission level voltages (60-500 kV) the protection schemes are more complex due to NERC, WECC, and CAISO mandated operating rules to maintain reliability of the PG&E transmission system that serves our customers, third party

large loads and generators, and other Participating Transmission Owners (PTO) operating within or on the periphery of the PG&E grid. All new connections above 100 kV must be to a new or existing substation or switching station. Exceptions are allowed on a restricted and temporary basis with PG&E's written approval as determined by PG&E standards.

13. Original Question: Would an existing CPUC General Order cover inspection and reporting of the newly constructed facilities?

Follow-Up Question: Please provide copies of your policies, procedures, and process documents for inspection of third-party constructed and installed electrical infrastructure assets.

PG&E follows the same practices/procedures of inspection with third-party contracted work as it does with internal contracted work. Typically, the project manager for a specific project works with the third-party and internal PG&E Construction Management team to ensure that newly constructed facilities are safe and meet PG&E standards before PG&E accepts the facilities from the third-party. PG&E's project managers and field crews have extensive experience and expertise in the installation of safe facilities that meet PG&E standards. PG&E will continue to utilize the current practices in place. PG&E is also proposing a new form contract for Rule 30 to provide clarity to the Applicant on inspection and oversight requirements for the Applicant Build Option.

14. Original Question: Why does PG&E need the refund calculation; explain the customer impact.

(No follow-up question from Energy Division)

15. Original Question: How will this new rule give these customers certainty that they can come online more quickly? Is it simply avoiding the need for bilateral negotiations for each new customer?

Follow-Up Question 15a: Can you estimate the value of the refund for one or two of the retail transmission customers on your list in terms of their operating revenues?

Please see Attachments:

(1) 2025-01-10_ED-Q015a_Attachment_BARC_Refund_Example_1.xlsx and
(2) 2025-01-10_ED-Q015a_Attachment_BARC_Refund_Example_2.xlsx.

Follow-Up Question 15b: Is it sufficient incentive for a new retail transmission customer to complete their project in a timely manner or at all?

Projects that Rule 30 would apply to require substantial investment from retail electric transmission level customers prior to interconnecting. Under Electric Rule 30, customers forfeit refund eligibility if they fail to take service. If a customer is interconnected and terminates service during the refund period, any remaining refund eligible advances not yet refunded are forfeited at that time. Applicable excerpts from Electric Rule 30:

Section C.8: “*FAILURE TO TAKE SERVICE. If the Applicant does not take any electrical service from PG&E for any reason by the end of the first calendar year after the Transmission Facilities are in service, the Applicant forfeits the right to receive any Refund under Section D.*”

Section D.10: “*TERMINATION OF SERVICE. If the Applicant terminates Retail Service during the Refund Period, and the Total Refund Amount has not been provided as a Refund, the Applicant automatically forfeits any remaining Refund amount.*”

These provisions protect PG&E’s existing customer and provide a strong incentive for retail electric transmission level customers to complete work and operate. In addition, retail electric transmission level customers will generally have incurred substantial behind the meter costs for land acquisition, building, permitting, and any infrastructure or equipment needed for operations. Because of this, it is unlikely a customer would initiate and pay for the interconnection work and then fail to take or prematurely terminate service.

16. **Original Question: How do these new customer loads impact PG&E's RA procurement obligations (i.e., who is going to pay for the new RA)?**
17. **Original Question: Has PG&E considered providing an option to interconnect these loads on a non-firm basis (i.e., have them take a lower level of service--keeping them out of the load forecast to avoid the need to procure RA for them) and have them 'self-serve' or 'curtail' during DR events to avoid the need to build additional capacity?**

Follow-Up Question 16 and 17: Please provide the load profiles for the data centers on PG&E's list of retail transmission applicants since 2023.

Please see Confidential Attachment *2025-01-10_ED-Q005_Attachment_Transmission_Level_Interconnection_CONF.xlsx*. Note, this file includes data center and non-data center projects and can be filtered accordingly. Additionally, these are preliminary load ramp schedules subject to change.

Please note that Attachment "2025-01-10_ED-Q005_Attachment_Transmission_Level_Interconnection_CONF.xlsx." contains confidential, customer specific information that should not be distributed or shared outside the Commission.

2. Attachment - [REDACTED] Procedure
CONFIDENTIAL

3. PG&E declaration claiming confidentiality

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

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION
ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

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