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Date: January 29, 2026
Witness(es): Various

PACIFIC GAS AND ELECTRIC COMPANY
2024 WILDFIRE MITIGATION AND CATASTROPHIC EVENTS
ERRATA TO REBUTTAL TESTIMONY
(REDLINE VERSION)



PACIFIC GAS AND ELECTRIC COMPANY
2024 WILDFIRE MITIGATION AND CATASTROPHIC EVENTS
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(REDLINE VERSION)

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PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 1

**REBUTTAL TESTIMONY ON
INTRODUCTION AND OVERVIEW**

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 1
REBUTTAL TESTIMONY ON
INTRODUCTION AND OVERVIEW

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PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 1
REBUTTAL TESTIMONY ON
INTRODUCTION AND OVERVIEW

A. Introduction [Stephanie Williams]

This rebuttal testimony responds to testimony submitted by the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) and The Utility Reform Network (TURN) regarding Pacific Gas and Electric Company's (PG&E) request to recover incremental costs recorded in the following balancing and memorandum accounts:

- 1) Catastrophic Events Memorandum Account (CEMA), for costs incurred to repair, restore, and replace damaged Electric Distribution, Gas, and Power Generation facilities, and for Butte Community Rebuild activities;
- 2) Gas Safety Rules & Regulations Memorandum Account (GSRRMA);
- 3) Gas Storage Balancing Account (GSBA);
- 4) Climate Adaptation Vulnerability Assessment Memorandum Account (CAVAMA); and
- 5) Customer Care memorandum accounts, including: the California Consumer Privacy Act Memorandum Account (CCPAMA); COVID-19 Pandemic Protection Memorandum Account (CPPMA); Disconnections Memorandum Account (DMA); Emergency Consumer Protections Memorandum Account (ECPMA); Medium-Large Commercial and Industrial COVID-19 Disconnection Moratorium Memorandum Account (ML-CDMMA); Microgrids Memorandum Account (MGMA); and the Percentage of Income Payment Plan Memorandum Account (PIPPMA).

B. Summary of Intervenor Recommendations

Table 1-1 summarizes PG&E's cost recovery request and Cal Advocates' and TURN's respective recommended amounts for recovery. PG&E will update the revenue requirement to reflect proposed recovery at a future date prior to hearings.

TABLE 1-1
SUMMARY OF INTERVENOR RECOMMENDATIONS
(THOUSANDS OF DOLLARS)

Line No.	Memorandum or Balancing Account	PG&E Proposed Recovery ^(a)	Cal Advocates Recommended Recovery ^(a)	TURN Recommended Recovery
1	<u>O&M Expense</u>			
2	ED CEMA	\$43,736	\$14,433	\$43,548
3	Community Butte Rebuild CEMA	2,080	1,934	—
4	Gas CEMA	1,064	4 <u>904</u>	1,064
5	Generation CEMA	2,725	2,504	2,725
6	GSRRMA	3,852	1,894	3,852
7	GSBA ^(b)	9,015	—	—
8	CAVAMA	1,063	533	1,063
9	CPPMA	2,342	1,197	2,342
10	DMA	5,717	311	5,717
11	PIPPMA	1,363	826	1,363
12	ML-CDMMA	1,217	1,217	1,217
13	CPPMA Incremental Uncollectibles	4,436	4,436	4,436
14	MGMA	111	111	111
15	Total O&M Expenses	\$79,975	\$30,427	\$67,438
16	<u>Capital Expenditure</u>			
17	ED CEMA	\$30,081	\$22,536	\$29,854
18	Community Butte Rebuild CEMA	361,457	78,496	—
19	Gas CEMA	7,180	985 <u>5,307</u>	7,077
20	Generation CEMA	2,049	1,538	2,049
21	GSRRMA	3,983	1,539	3,983
22	GSBA ^(b)	115,667	—	—
23	Total Capital Expenditures	\$520,418	\$105,094	\$42,963
24	Grand Total	\$600,393	\$135,521	\$110,401

(a) PG&E's Proposed Recovery and Cal Advocates' Recommended Recovery have been updated to align with PG&E's Errata Testimony served on October 3, 2025.

(b) PG&E is seeking reasonableness review only and is not seeking cost recovery for Expenses or Capital Expenditures recorded to the GSBA.

1 In addition to recommending disallowances of specific costs, TURN argues
2 generally that any capital expenditures that are disallowed in this case should
3 not be rolled into PG&E's rate base in future General Rate Cases (GRC),
4 despite the assets being used and useful.¹ PG&E responds to this argument in
5 Section C.2 below.

¹ TURN-01, p. 52.

C. Discussion

1. The Commission Should Approve PG&E's Cost Recovery Requests

PG&E's activities and associated costs are reasonable and consistent with sound utility practices, law, and California Public Utilities Commission (Commission) policy. Our CEMA activities were necessary to eliminate potentially hazardous conditions, communicate with customers, repair or replace damaged facilities, and restore vital service to our customers following catastrophic events in accordance with California law and Commission policy. Our Butte Community Rebuild program made the town of Paradise safer while efficiently modernizing gas infrastructure, consistent with the goals of the community. The gas initiatives recorded to the GSRRMA and GSBA were necessary to comply with new regulations and directives issued between rate case funding cycles. Likewise, our climate vulnerability assessment and customer outreach work recorded to the CAVAMA responded to Commission directives and advanced shared policy goals. Finally, the various customer-focused initiatives recorded in the other memorandum accounts under review provided critical support to our customers in accordance with new legislative and regulatory requirements.

Although Cal Advocates and TURN recommend certain disallowances, they generally do not challenge either the necessity or the critical public and customer benefits that these activities provide.

a. Organization of This Rebuttal Testimony

In subsequent chapters, PG&E addresses Cal Advocates' and TURN's contentions with respect to each account, as outlined below:

- 1) Chapter 2 addresses Cal Advocates' and TURN's disallowance recommendations for certain Electric Distribution costs recorded to CEMA;
- 2) Chapter 3 addresses Cal Advocates' and TURN's disallowance recommendations for Butte Community Rebuild costs recorded to CEMA;
- 3) Chapter 4 addresses Cal Advocates' and TURN's disallowance recommendations for certain Gas Operations costs recorded to CEMA;

- 1 4) Chapter 5 addresses Cal Advocates' disallowance
- 2 recommendations for certain Generation costs recorded to CEMA;
- 3 5) Chapter 6 addresses Cal Advocates' and TURN's disallowance
- 4 recommendations for certain costs recorded to the GSRRMA;
- 5 6) Chapter 7 addresses Cal Advocates' and TURN's arguments
- 6 regarding PG&E's request for reasonableness review of costs
- 7 recorded to the GSBA;
- 8 7) Chapter 8 addresses Cal Advocates' disallowance
- 9 recommendations for certain costs recorded to the CAVAMA;
- 10 8) Chapter 9 addresses Cal Advocates' disallowance
- 11 recommendations for certain costs recorded to the other
- 12 memorandum accounts included in this proceeding;
- 13 9) Chapter 10 addresses Cal Advocates' and TURN's general
- 14 arguments regarding the incrementality of certain costs, and
- 15 Cal Advocates' disallowance recommendations that apply broadly
- 16 across chapters.

17 **2. Future Revenue Requirements Associated With Capital Expenditures**

18 **Under Review Should Be Included in Future GRCs [Mia Gilbert]**

19 In Opening Testimony, PG&E proposed to roll the recorded capital
20 additions and plant associated with capital expenditures in this Application
21 into the 2031 GRC rate base.² TURN asks the Commission to prohibit
22 PG&E from rolling any capital expenditures that are disallowed in this
23 proceeding into rate base in the future.³ Were the Commission to
24 implement TURN's recommendation, it would undermine utility wildfire
25 mitigation efforts, run contrary to fundamental ratemaking principles, and
26 result in PG&E receiving no rate recovery for assets that it must maintain
27 and that customers will benefit from for years, and in some cases decades,
28 to come.

² PG&E Errata Testimony, p. 12-12, lines 29-31.

³ TURN-01, p. 52, lines 1-13.

1 It is a fundamental principle of utility cost-of-service ratemaking that
2 used and useful assets should be part of a utility's rate base,⁴ and TURN
3 does not argue that the facilities underlying PG&E's capital investments are
4 not used and useful. To the contrary, the CEMA capital investments that
5 TURN challenges as unreasonable were made to repair or replace damaged
6 assets as part of PG&E's catastrophic event response in accordance with
7 California state law. The new or restored assets will continue to provide
8 service over their entire useful lives and it is part of standard utility
9 ratemaking that the costs be shared across all future customers who will
10 receive the benefit from them.

11 Moreover, accepting TURN's recommendation would severely harm
12 PG&E's financial health and ability to serve customers by creating regulatory
13 uncertainty, eroding investor confidence, and making it more difficult and
14 expensive for PG&E to fund critical emergency response and wildfire risk
15 reduction work. The concept of excluding specific capital assets from rate
16 base for the entire life of the assets without a finding that they are not used
17 and useful upends traditional utility ratemaking and reasonable investor
18 expectations, creating regulatory uncertainty. Utilities and investors will feel
19 less confident that critical utility investments will be recovered. The
20 investment community will perceive the ongoing capital disallowance as
21 inconsistent with the reasonable exercise of the Commission's oversight
22 function, and be unsupportive of utilities taking timely action to ensure
23 long-term safety. This negatively affects PG&E's ability to serve its
24 customers. As a result, prohibiting PG&E from rolling capital expenditures
25 into future GRCs would increase the cost of debt and equity which will result
26 in higher customer costs.

27 If the Commission were to signal that capital investments in used and
28 useful assets can be disallowed for the entire life of the assets it would

⁴ Decision (D.) 84-09-089, 16 CPUC 2d 205, 1984 Cal. PUC LEXIS 1013, p. 55 ("Over the years, this Commission has closely adhered to the 'used and useful' principle, which requires that utility property be actually in use and providing service in order to be included in the utility's ratebase"); D.20-12-005, p. 380, Finding of Fact 301; Public Utilities Code, § 454.8 ("[W]hen the commission has found and determined that the addition or extension is used and useful, the commission shall consider a method for the recovery of these costs that would be constant in real economic terms over the useful life of the facilities").

1 undermine PG&E's—and any utility's—ability to maintain its system, meet
2 new demands, keep pace with emerging wildfire risk, and implement the
3 state's policy objectives in areas like clean energy. It could result in a
4 situation where PG&E installed a new and improved asset that would not be
5 reflected in its rate base despite providing superior and longer lasting
6 benefits to PG&E's customers in comparison to the assets replaced.
7 PG&E's customers and stakeholders are best served by a regulatory
8 environment that: (1) is productive and focused on securing the lowest cost
9 financing for critical safety work, and (2) demonstrates that the regulatory
10 compact in California is being adhered to.

11 To that end, PG&E proposes that future revenue requirements
12 associated with capital expenditures under review in this Application be
13 included in future GRCs or as authorized, consistent with typical utility
14 capital ratemaking and prior settlements approved as reasonable by the
15 Commission.⁵

16 **D. Conclusion [Stephanie Williams]**

17 The costs we present in this application are for activities that were critical to
18 restore, rebuild, and maintain the safety and reliability of our system and
19 improve services for our customers, and are consistent with the policies
20 underlying the respective memorandum and balancing accounts. While we
21 recognize the burden of these significant costs on our customers, we continue to
22 believe that prioritizing disaster response, wildfire mitigation and community
23 restoration, and customer-focused initiatives best serves our communities and
24 the state of California.

5 See D.20-11-035, Appendix A, Section 4.5 ("PG&E will continue to recover the authorized Electric Distribution and Gas Distribution capital revenue requirements beyond December 31, 2022 in its next GRC, currently slated for a 2023 Test Year").

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 2
REBUTTAL TESTIMONY ON
ELECTRIC: CEMA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 2
REBUTTAL TESTIMONY ON
ELECTRIC: CEMA

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PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 2
REBUTTAL TESTIMONY ON
ELECTRIC: CEMA

A. Introduction (Marcus Wendler)

The purpose of this rebuttal testimony is to respond to the recommendations made by the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) regarding costs recorded in the Catastrophic Event Memorandum Account (CEMA) for responding to various government declared catastrophic events impacting California. The Pacific Gas and Electric Company (PG&E) witnesses sponsoring the rebuttal testimony are noted in parentheses corresponding to the subsections of this testimony.

The California Public Utilities Commission (Commission) should consider that PG&E's CEMA costs are necessary to repair damaged facilities, restore service, and comply with law. Under Public Utilities Code Section 454.9 and Resolution E 3238, a utility has the opportunity to recover through its CEMA the costs of: (1) restoring utility service to customers; (2) repairing, replacing, or restoring damaged utility facilities; and (3) complying with governmental agency orders resulting from declared disasters. The Commission should approve PG&E's CEMA cost recovery request under this regulatory framework. PG&E's CEMA costs supported activities necessary to repair damaged electric facilities and restore electric service to customers following various wildfires and other government declared catastrophic events.

1. Summary of Intervenor Recommendations

Cal Advocates recommends reductions of ~~\$13.988~~\$28.812 million in expense and ~~\$22.482~~\$7.034 million in capital expenditures for Electric Distribution costs recorded to the CEMA on the basis that these costs are not incremental to funding authorized in PG&E's General Rate Case (GRC) or other proceedings. Cal Advocates also recommends disallowances of \$0.445 million in expense and \$0.054 million in capital expenditures of helicopter costs.¹

¹ Exh. CA-02 at 3:1-2, 20:6-7, 22:8 (Table 2-6).

The Utility Reform Network (TURN) recommends a 100 percent disallowance of the \$0.188 million in expense and \$0.227 million in capital expenditures PG&E incurred to restore power to customers after the 2017 Nuns Fire.²

**TABLE 2-1
ADJUSTED RECORDED EXPENSES AND PARTIES RECOMMENDATIONS
(THOUSANDS OF DOLLARS)**

Line No.	Account	Adjusted Recorded	Cal Advocates	TURN
		2023 Adj. Recorded	2023 Increases/ (Reductions)	2023 Increases/ (Reductions)
1	CEMA – Electric	\$43,690	\$(14,433) \$(29,257)	\$(188)
2	Total	\$43,690	\$(14,433) \$(29,257)	\$(188)

**TABLE 2-2
ADJUSTED CAPITAL EXPENDITURES AND PARTIES RECOMMENDATIONS
(THOUSANDS OF DOLLARS)**

Line No.	Account	Adjusted Recorded	Cal Advocates	TURN
		2023 Adj. Recorded	2023 Increases/ (Reductions)	2023 Increases/ (Reductions)
1	CEMA – Electric	\$29,823	\$(22,536) \$(7,088)	\$(227)
2	Total	\$29,823	\$(22,536) \$(7,088)	\$(227)

B. Commission Should Approve PG&E's CEMA Cost-Recovery Request (Marcus Wendler)

1. The Costs Recorded to the CEMA Are Incremental

Cal Advocates incorrectly recommends that the Commission disallow straight-time labor and overhead costs as well as PG&E's inventoried, bulk materials (materials movement) and accrued costs for which it was

² Exh. TURN-1 at 42:16-17.

1 necessary for PG&E to record an Estimated Goods Receipt. PG&E
2 addresses Cal Advocates' arguments regarding incrementality in Chapter 10
3 of its rebuttal testimony.

4 **2. PG&E's Helicopter Costs Are Necessary to Respond to CEMA Events,** 5 **Restore Service, and Fulfill PG&E's Obligations**

6 Cal Advocates mischaracterizes PG&E's helicopter costs as
7 discretionary. PG&E maintains helicopter support on 24-hour standby to
8 ensure it can satisfy its service obligations and respond to threats to public
9 safety.³ This standby requirement ensures aerial support is available for
10 catastrophic CEMA events. The importance of aerial support for such
11 activities is well-established and has been recognized by the Commission.⁴

12 The Commission should disregard Cal Advocates' mischaracterizations
13 and approve PG&E's requested helicopter costs, which are reasonable and
14 necessary.

15 **3. PG&E Provided Appropriate and Sufficient Evidence to Support its Use** 16 **and Costs of Helicopters in CEMA**

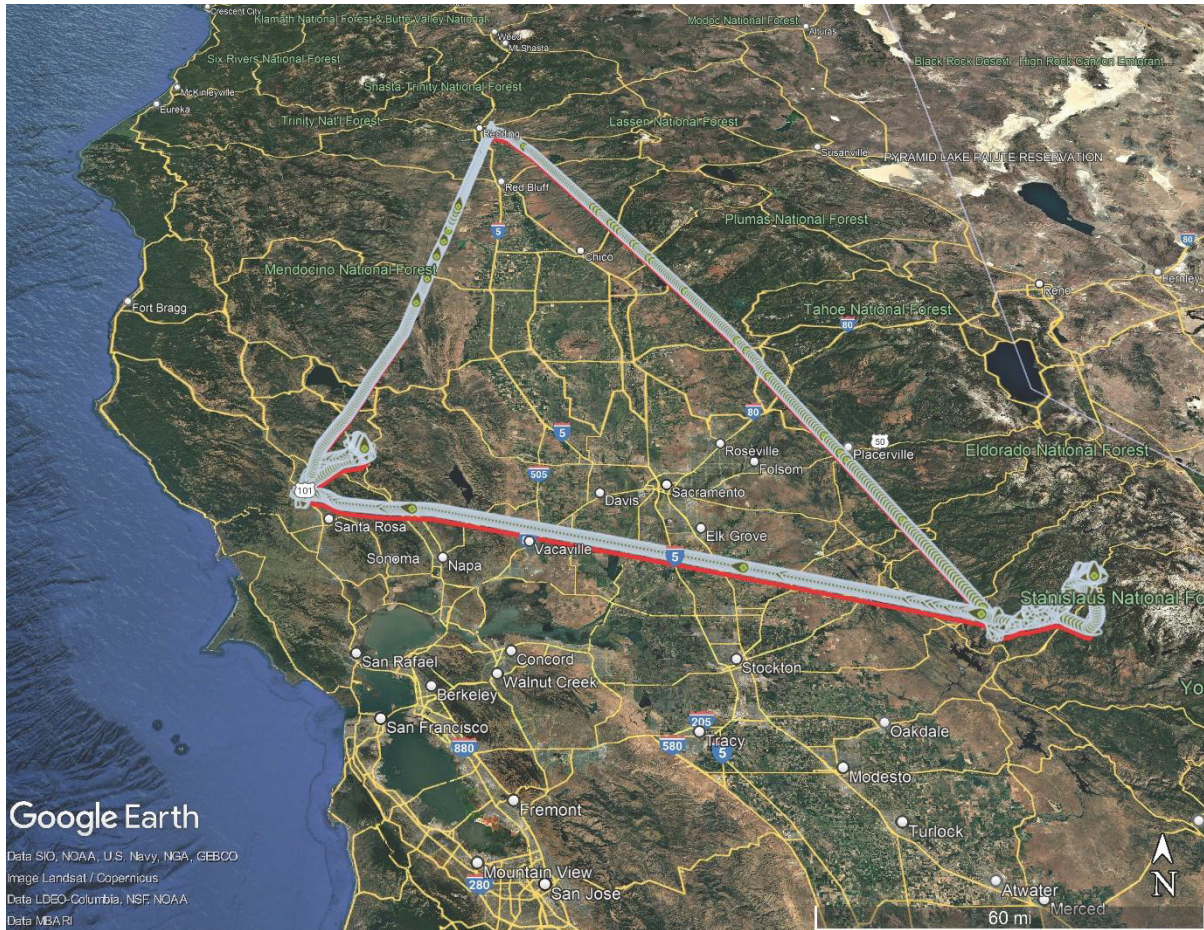
17 Cal Advocates asserts that "*none*" of PG&E's helicopter costs are
18 reasonable because PG&E did not dispatch a helicopter for a "single CEMA
19 event."⁵ Cal Advocates is wrong. PG&E helicopter costs were incurred in
20 response to CEMA events. For example, on March 1, 2023, a PG&E
21 helicopter performed a patrol in response to the 2023 February-March
22 Winter Storms, as shown in Figure 2-1.

3 See [D.20-05-051](#) at 95 (May 28, 2020) (Ordering Paragraph 29 generally requiring response and service restoration within 24 hours); see generally [D.20-12-005](#) (Dec. 3, 2020) (finding helicopter costs necessary and reasonable for restoration of service and other activities related to Community Wildfire Safety Program (CWSP)).

4 See, e.g., Decision (D.) 20-12-005 at 387 (Finding of Fact 358, finding relevant CWSP response and helicopter costs "benefit all utility functions"); see also [D.25-09-008](#) at 34-35 (Sept. 18, 2025) (rejecting Cal Advocates' disallowance for PSPS helicopter costs in 2021 WMCE).

5 Exh. CA-02 at 21:18-19 (emphasis in original).

**FIGURE 2-1
HELICOPTER FLIGHT PATH**



1 PG&E provided Cal Advocates with invoices reflecting the costs it
2 incurred for helicopter use during its CEMA events. PG&E also provided
3 Cal Advocates with a list of the specific events for which these costs were
4 incurred in its excel workpaper titled, “2024 WMCE Audit Line-Item Detail
5 Report Chapter 2.”⁶ Cal Advocates argument that PG&E failed to provide
6 sufficient evidence in support of the incrementality of its helicopter costs in
7 CEMA is therefore without merit.

8 Moreover, Cal Advocates’ recommended disallowance of PG&E’s
9 request to recover helicopter costs in CEMA is founded upon a
10 mischaracterization of PG&E’s response to its data request titled,

⁶ Attachment A – PG&E’s 2024 WMCE Audit Line Item Detail Report Chapter 2 – Post Errata.

1 “PubAdv-PG&E-012-ANU”⁷, in which Cal Advocates asks in part whether
2 PG&E received authorization for the cost of helicopters in its General Rate
3 Case (GRC) proceedings. PG&E’s full response to this question was as
4 follows: “Yes, PG&E received authorization for helicopter costs in the
5 context of multiple projects and programs in the Commission’s 2023 GRC
6 decision (D.23-11-069) and the 2020 GRC decision (D.20-12-005).
7 *However, PG&E did not seek or receive authorization for helicopter costs for*
8 *any CEMA-related events in these filings.*” The omission of the second
9 sentence of this response in Cal Advocates’ testimony materially and
10 disingenuously alters PG&E’s response.

11 Cal Advocates’ recommended disallowances are meritless. The
12 Commission should disregard Cal Advocates’ recommendation and allow
13 PG&E to recover the full cost of its CEMA helicopter usage.

14 **C. A Pre-Fire Prudency Showing is Unnecessary for the Nuns Fire**
15 **(Alyssa Koo)**

16 TURN recommends that the Commission disapprove of PG&E’s requested
17 CEMA recovery for the Nuns, Atlas, and Redwood Fires⁸ because “PG&E has
18 not provided evidence that it met the prudency standard in its pre-fire operations
19 for these three 2017 incidents.”⁹ As with the Camp Fire and PG&E’s proposed
20 Butte Community Rebuild costs, PG&E respectfully recommends that the
21 Commission not conduct an additional review of PG&E’s pre-fire operations
22 relating to these wildfires, because they were within the scope of the Wildfire
23 Order Instituting Investigation (OII), “which resolve[d] all issues in this
24 investigation concerning the penalties and other remedies that should be
25 imposed on PG&E for the role its electrical facilities played in igniting wildfires in
26 its service territory in 2017 and 2018.”¹⁰

27 PG&E’s Supplemental and Rebuttal Testimony, Chapter 3, provides
28 additional discussion regarding PG&E’s general position regarding the policy

7 Attachment B – PG&E’s Data Responses to 2024WMCE_DR_CALADVOCATES_012.

8 PG&E is not requesting cost recovery for costs incurred resulting from Atlas or Redwood Fires in Chapter 2.

9 TURN Testimony, p. 45.

10 D.20-05-019, pp. 2-3, 9-10.

1 question of whether the Commission should conduct an additional pre-fire
2 prudency review with respect to fires at issue in the Wildfire OII.

3 **D. Conclusion (Marcus Wendler)**

4 For the reasons discussed above, the Commission should approve PG&E's
5 cost recovery proposal for Electric Distribution activities recorded to CEMA as
6 reasonable. These costs were incurred as a result of PG&E's response to
7 emergency events – work which is critical to our ongoing efforts to ensure public
8 safety and the reliability of PG&E's electric distribution systems.

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 2
ATTACHMENT A
PG&E'S 2024 WMCE AUDIT LINE ITEM DETAIL REPORT
CHAPTER 2 – POST ERRATA

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 2
ATTACHMENT B
PG&E'S DATA RESPONSES TO
2024WMCE_DR_CALADVOCATES_012

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 3
BUTTE COMMUNITY REBUILD

THIS CHAPTER HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 3

ATTACHMENT A

PG&E'S DATA RESPONSE TO 2024WMCE_DR_TURN_007-Q007

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 3

ATTACHMENT B

MARCH 4, 2019 EXECUTIVE STEERING COMMITTEE KICKOFF

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 3
ATTACHMENT C
APRIL 2019 EXECUTIVE STEERING COMMITTEE BUTTE
REBUILD MASTER PLAN

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 3
ATTACHMENT D
PG&E'S DATA RESPONSES TO 2024WMCE_DR_TURN_001-
Q002, Q006 AND Q008

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 3
ATTACHMENT E
PGE 2020 GRC SYSTEM HARDENING UNDERGROUNDING
FORECAST

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 3
ATTACHMENT F
WILDFIRE OIL SETTLEMENT AGREEMENT

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 3
ATTACHMENT G
PG&E'S RESPONSE TO CAL ADVOCATES DATA REQUEST
"PUBADV-PG&E-016-BEN"

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 4

REBUTTAL TESTIMONY ON

GAS: CEMA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 4
REBUTTAL TESTIMONY ON
GAS: CEMA

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PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 4
REBUTTAL TESTIMONY ON
GAS: CEMA

A. Introduction [Tracey Latipow]

The purpose of this rebuttal testimony is to respond to the recommendations made by the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) regarding costs recorded in the Catastrophic Event Memorandum Account (CEMA) for responding to various government declared catastrophic events impacting California. The Pacific Gas and Electric Company (PG&E) witnesses sponsoring the rebuttal testimony are noted in parentheses corresponding to the subsections of this testimony.

The California Public Utilities Commission (Commission) should consider that PG&E's CEMA costs are necessary to repair damaged facilities, restore service, and comply with law. Under Public Utilities Code Section 454.9 and Resolution E 3238, a utility has the opportunity to recover through its CEMA the costs of: (1) restoring utility service to customers; (2) repairing, replacing, or restoring damaged utility facilities; and (3) complying with governmental agency orders resulting from declared disasters. The Commission should approve PG&E's CEMA cost recovery request under this regulatory framework. PG&E's CEMA costs supported activities necessary to repair damaged gas distribution assets and restore service to customers following various wildfires, winter storms, and other government declared catastrophic events.

1. Summary of Intervenor Recommendations

Cal Advocates recommends reductions of ~~\$0.904~~\$0.208 million in expense and ~~\$1.344~~\$1.873 million in capital expenditures for Gas Distribution costs recorded to the CEMA on the basis that these costs are not incremental to funding authorized in PG&E's General Rate Case (GRC) or other proceedings.¹

¹ Exh. CA-02 at 4:10 (Table 2-1).

The Utility Reform Network (TURN) recommends a disallowance of \$0.103 million in Gas capital expenditures PG&E incurred as a result of the Nuns, Redwood, and Atlas Fires.²

TABLE 4-1
ADJUSTED RECORDED EXPENSES AND PARTIES RECOMMENDATIONS
(THOUSANDS OF DOLLARS)

Line No.	Account	Adjusted Recorded	Cal Advocates	TURN
		2023 Adj. Recorded	2023 Increases/ (Reductions)	2023 Increases/ (Reductions)
1	CEMA – Gas	\$1,064	\$(1,063) \$(208)	No Position
2	Total	\$1,064	\$(1,063) \$(208)	N/A

TABLE 4-2
ADJUSTED CAPITAL EXPENDITURES AND PARTIES RECOMMENDATIONS
(THOUSANDS OF DOLLARS)

Line No.	Account	Adjusted Recorded ^(a)	Cal Advocates	TURN
		2023 Adj. Recorded	2023 Increases/ (Reductions) ^(a)	2023 Increases/ (Reductions)
1	CEMA – Gas	\$7,180	\$(6,195) \$(1,873)	\$(103)
2	Total	\$7,180	\$(6,195) \$(1,873)	\$(103)

(a) Cal Advocate's recommendation is adjusted to reflect PG&E's updated 2023 recorded based on Errata served on October 3, 2025.

² TURN's recommendation is to "reject PG&E's request to recover costs in connection with the 2017 Nuns, Redwood, and Atlas Fires." TURN-1 at 46:7-9. The \$0.103 Management Measures is implied from PG&E's testimony.

1 **B. The Commission Should Approve PG&E's Gas CEMA Cost Recovery**
2 **Request (Tracey Latipow)**

3 **1. The Gas Distribution Costs Recorded to the CEMA Are Incremental**

4 Cal Advocates incorrectly recommends that the Commission disallow
5 straight-time labor and overhead costs as well as PG&E's inventoried, bulk
6 materials ("materials movement") and accrued costs for which it was
7 necessary for PG&E to record an Estimated Goods Receipt. PG&E
8 addresses Cal Advocates' arguments regarding incrementality in
9 Chapter 10, Sections B and D of its rebuttal testimony.

10 **C. Pre-Fire Prudency Showing is Unnecessary for the Nuns, Atlas, and**
11 **Redwood Fires (Alyssa Koo)**

12 TURN recommends that the Commission disapprove of PG&E's requested
13 CEMA recovery for the Nuns, Atlas, and Redwood Fires because "PG&E has
14 not provided evidence that it met the prudency standard in its pre-fire operations
15 for these three 2017 incidents."³ As with the Camp Fire and PG&E's proposed
16 Butte Community Rebuild costs, PG&E respectfully recommends that the
17 Commission not conduct an additional review of PG&E's pre-fire operations
18 relating to these wildfires, because they were within the scope of the Wildfire
19 Order Instituting Investigation (OII), "which resolve[d] all issues in this
20 investigation concerning the penalties and other remedies that should be
21 imposed on PG&E for the role its electrical facilities played in igniting wildfires in
22 its service territory in 2017 and 2018."⁴ See PG&E's Supplemental and Rebuttal
23 Testimony, Chapter 3, for additional discussion regarding PG&E's general
24 position regarding the policy question of whether the Commission should
25 conduct an additional pre-fire prudency review with respect to fires at issue in
26 the Wildfire OII.

27 **D. Conclusion [Tracey Latipow]**

28 The Gas Distribution costs PG&E incurred responding to emergency events
29 were necessary to ensure public safety. They were properly recorded to CEMA
30 and were not funded through any other rate case proceeding. Therefore, the

3 TURN Testimony, p. 45.

4 Decision 20-05-019, p. 2-3, 9-10.

- 1 Commission should approve PG&E's cost recovery proposal for Gas Distribution
- 2 activities recorded to CEMA as reasonable.

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 5

POWER GENERATION: CEMA

THIS CHAPTER HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 5
ATTACHMENT A
PG&E'S DATA RESPONSE TO
2024WMCE_DR_CALADVOCATES_001-Q001 REGARDING
CHAPTER 5

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 6
GAS STATUTES REGULATIONS AND RULES MEMORANDUM
ACCOUNT

THIS CHAPTER HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 6
ATTACHMENT A
PG&E'S DATA RESPONSE TO
2024WMCE_DR_CALADVOCATES_001-Q001 REGARDING
CHAPTER 6

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 6

ATTACHMENT B

PG&E'S DATA RESPONSE TO

2024WMCE_DR_CALADVOCATES_036,

2024WMCE_DR_CALADVOCATES_037,

2024WMCE_DR_CALADVOCATES_042, AND

2024WMCE_DR_CALADVOCATES_069

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 7
GAS STORAGE BALANCING ACCOUNT

THIS CHAPTER HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 7
ATTACHMENT A
PG&E'S DATA RESPONSE TO
2024WMCE_DR_CALADVOCATES_001-Q001 REGARDING
CHAPTER 7

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 7
ATTACHMENT B
PG&E'S DATA RESPONSE TO PG&E'S RESULTS OF
OPERATIONS (RO) WORKPAPER-2023 GSBA BALANCES
SUPPORTING CHAPTER 7

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 7
ATTACHMENT C
PG&E'S DISCOVERY RESPONSES SUPPORTING CHAPTER 7

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 8
CLIMATE ADAPTATION VULNERABILITY ASSESSMENT
MEMORANDUM ACCOUNT

THIS CHAPTER HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 8
ATTACHMENT A
2024 WMCE LINE-ITEM DETAIL REPORT CHAPTER 8

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 9
OTHER MISCELLANEOUS MEMORANDUM ACCOUNTS

THIS CHAPTER HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 9
ATTACHMENT A
PG&E'S DATA RESPONSE TO
2024WMCE_DR_CALADVOCATES_001-Q001SUPP01

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 9
ATTACHMENT B
PG&E'S DATA RESPONSE TO
2024WMCE_DR_CALADVOCATES_050 AND 2024WMCE_DR-
CALADVOCATES_082

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 10
INCREMENTALITY

THIS CHAPTER HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 10

ATTACHMENT A

**EXCERPTS FROM PG&E'S 2023 GRC (A.21-06-021), EXHIBIT 04
ELECTRIC DISTRIBUTION, UPDATED FOR ERRATA,
CHAPTERS 1-6, VOLUME 1 OF 3, PAGES 2-20 THROUGH 2-23**

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 10

ATTACHMENT B

**EXCERPTS FROM PG&E'S 2023 GRC (A.21-06-021), EXHIBIT 07
SHARED SERVICES AND INFORMATION TECHNOLOGY,
UPDATED FOR ERRATA, WORKPAPERS SUPPORTING
CHAPTERS 1-4, PAGES WP 2-1 THROUGH 2-6**

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 10
ATTACHMENT C
PG&E RESPONSE TO CAL ADVOCATES DATA REQUEST 28,
QUESTION 1

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 10

ATTACHMENT D

2020, 2021, 2022 AND 2023 RSAR TABLES 1-1 AND 1-2

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 10

ATTACHMENT E

**EXCERPTS FROM PG&E'S 2023 GRC (A.21-06-021), EXHIBIT 04
ELECTRIC DISTRIBUTION, UPDATED FOR ERRATA,
WORKPAPERS SUPPORTING CHAPTERS 2-13, PAGES WP 6-8
AND 6-18**

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 11
ACCOUNTING OF COSTS

THIS CHAPTER HAS NO REBUTTAL

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 12
REVENUE REQUIREMENT

THIS CHAPTER HAS NO REBUTTAL

PACIFIC GAS AND ELECTRIC COMPANY
APPENDIX A
ERNST AND YOUNG WILDFIRE MITIGATION AND
CATASTROPHIC EVENTS COST ANALYSIS

THIS APPENDIX HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
APPENDIX B
STATEMENT OF QUALIFICATIONS

THIS APPENDIX HAS NO ERRATA