Application: 25-05-
(U 39 M)
Exhibit No.: (PG&E-6)
Date: May 15, 2025
Witness(es): Various

PACIFIC GAS AND ELECTRIC COMPANY

2027 GENERAL RATE CASE

PREPARED TESTIMONY

EXHIBIT (PG&E-6)

CUSTOMER AND ENTERPRISE SOLUTIONS

PACIFIC GAS AND ELECTRIC COMPANY
2027 GENERAL RATE CASE
EXHIBIT (PG&E-6)
CUSTOMER AND ENTERPRISE SOLUTIONS

TABLE OF CONTENTS

Chapter	Title	Witness
1	CUSTOMER AND ENTERPRISE SOLUTIONS SUMMARY	Chris Zenner
2	LOCAL CUSTOMER ENGAGEMENT	Steven J. Debacker Jason Guenther Lydia Krefta Gareth Stamp Julie Stanley
Attachment A	REPORT PURSUANT TO 2023 GRC MEMORANDUM OF UNDERSTANDING BETWEEN SMALL BUSINESS UTILITY ADVOCATES AND PACIFIC GAS AND ELECTRIC COMPANY ON SUPPLIER DIVERSITY INITIATIVES	Jason Guenther
3	CUSTOMER PROGRAMS	Joseph Au Megan Ching Larsen Plano
Attachment A	MEMORANDUM OF UNDERSTANDING BETWEEN NATIONAL DIVERSITY COALITION AND PACIFIC GAS AND ELECTRIC COMPANY	Megan Ching
4	CUSTOMER COMMUNICATIONS	John Kaufman
5	CUSTOMER SERVICE	Kristin Punter Stephanie Sheldrick
Attachment A	2024 CSO ANNUAL REPORT	Kristin Punter
6	BILLING, REVENUE, AND CREDIT	Rakesh Nigam
7	METERING SERVICES AND ENGINEERING	Earle Davis
Attachment A	SMARTMETER™ COST-EFFECTIVENESS UPDATE	Earle Davis
8	GAS AMI PROGRAM	Gustavo Castillo David Console

PACIFIC GAS AND ELECTRIC COMPANY
2027 GENERAL RATE CASE
EXHIBIT (PG&E-6)

TABLE OF CONTENTS
(CONTINUED)

Chapter	Title	Witness
9	ELECTRIC AMI PROGRAM	David Console Chris Moris
10	CUSTOMER AND ENTERPRISE SOLUTIONS BUSINESS OPERATIONS	Ronnie Chriss Jennie Tong
11	CUSTOMER AND ENTERPRISE SOLUTIONS TECHNOLOGY VALUE STREAMS	Matt Briel Matthew Hedges
12	MOBILE HOME PARK UTILITY UPGRADE PROGRAM	David Perez
Attachment A	MOBILE HOME PARK UTILITY UPGRADE PROGRAM, 2024 CPUC ANNUAL REPORT	David Perez
Attachment B	MOBILE HOME PARK UTILITY UPGRADE PROGRAM SUPPLEMENTAL INDIVIDUAL PROJECT AND COST INFORMATION	David Perez

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 1

CUSTOMER AND ENTERPRISE SOLUTIONS SUMMARY

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 1
CUSTOMER AND ENTERPRISE SOLUTIONS SUMMARY

TABLE OF CONTENTS

A. Introduction 1-1

B. Key Developments Since 2023 GRC 1-2

1. Reorganization from Customer and Communications to Customer and Enterprise Solutions 1-2

a. Utility Partnerships and Innovation 1-2

b. Customer and Enterprise Solutions 1-3

2. Improving the Customer Experience with the Customer at the Heart 1-4

3. Separate Applications Filed for Gas Advanced Metering Infrastructure and Billing Modernization Programs 1-5

4. Climate Resilience Investment 1-6

C. Overview of Forecast 1-7

1. Expense 1-7

2. Capital 1-13

D. Customer and Enterprise Solutions Exhibit Roadmap 1-17

1. Chapter 2: Local Customer Engagement 1-17

2. Chapter 3: Customer Programs 1-17

3. Chapter 4: Customer Communications 1-17

4. Chapter 5: Customer Service 1-17

5. Chapter 6: Billing, Revenue, and Credit 1-18

6. Chapter 7: Metering Services and Engineering 1-18

7. Chapter 8: Gas Advanced Metering Infrastructure Program 1-18

8. Chapter 9: Electric Advanced Metering Infrastructure Program 1-18

9. Chapter 10: C&ES Business Operations 1-18

10. Chapter 11: C&ES Technology Value Streams 1-19

11. Chapter 12: Mobile Home Park Utility Upgrade Program 1-19

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 1
CUSTOMER AND ENTERPRISE SOLUTIONS SUMMARY

TABLE OF CONTENTS
(CONTINUED)

E. Balancing and Memorandum Accounts 1-19

1. Non-Tariffed Products and Services Balancing Account 1-19

2. Non-Tariffed Products and Services Memorandum Account 1-19

3. Regional Plan Memorandum Account 1-20

4. California Distributed Generation Statistics Website Memorandum Account – 2 1-20

F. Compliance with Prior Commission Decisions 1-20

G. Conclusion 1-21

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 1
CUSTOMER AND ENTERPRISE SOLUTIONS SUMMARY

A. Introduction

This chapter provides a summary of Pacific Gas and Electric Company's (PG&E or the Company) forecast of Customer and Enterprise Solutions (C&ES) expenditures and activities for the 2027 General Rate Case (GRC) period (2027-2030). C&ES drives the Company's customer strategy and communications across all functional areas with the goal of delivering excellent customer experiences every day and making it enjoyable to work with PG&E. C&ES functions include overseeing the meter-to-cash process,[1] providing customer service, marketing and managing customer programs that support bill affordability and decarbonization, communicating critical information to our customers related to safety and their bills, managing digital channels (e.g., PGE.com) and technology enhancements, establishing a stronger local presence in our communities to deliver on our commitments through our Regional Service Model, and embedding the Lean Operating System across the Company to enhance decision-making, streamline daily work, improve customer outcomes, and drive operational excellence.

This chapter discusses key developments impacting C&ES since the 2023 GRC, provides an overview of the 2027 C&ES expense and capital forecasts, explains the initiatives included in each chapter of this exhibit, summarizes requests related to C&ES balancing and memorandum accounts, and identifies GRC compliance requirements and where they are discussed in this exhibit.

---

[1] Meter-to-cash refers to the day-to-day processes associated with reading, estimating, and storing meter data, measuring energy consumption, calculating and sending customer bills, managing credit and collections, processing payments, and managing revenue operations.

B. Key Developments Since 2023 GRC

1. Reorganization from Customer and Communications to Customer and Enterprise Solutions

Since filing its 2023 GRC in June 2021, PG&E reorganized its Customer and Communications functional area, which resulted in two primary changes from the management structure presented in the 2023 GRC.

a. Utility Partnerships and Innovation

In September 2022, PG&E formed the Utility Partnerships and Innovation (UP&I) organization, which consolidated several teams from across the Company into a new organization within the Engineering, Planning, and Strategy functional area. The purpose of the reorganization was to better align teams supporting the Energy System component of the Company's True North Strategy,[2] which includes accelerating load management solutions that provide cost-effective, reliable, and simple demand flexibility, as well as preparing the grid to support millions of electric vehicles (EVs) and developing foundational capabilities to harness flexible EV load to decarbonize the grid at the lowest cost. Activities supported by UP&I are included throughout PG&E's GRC to align with similar work presented in other exhibits and chapters. For instance, Customer Resiliency programs formerly included in Exhibit (PG&E-6), Chapter 2 in the 2023 GRC have been transitioned to Exhibit (PG&E-4), Chapter 6 where they are discussed alongside other programs that assist customers with emergency preparedness.

PG&E retains the following UP&I activities from the 2023 GRC in Exhibit (PG&E-6), Chapter 2, which were previously included in that chapter: Clean Energy Transportation,[3] New Revenue Development, and Data and Energy Management Products. This exhibit also includes costs associated with the UP&I Business Operations team in Exhibit (PG&E-6), Chapter 10 (C&ES Business Operations).

---

2 Exhibit (PG&E-2), Ch. 2.

3 Included in "Transportation and Building Electrification" section in Exhibit (PG&E-6), Ch.2.

b. Customer and Enterprise Solutions

In October 2023, PG&E reorganized its Customer and Communications functional area into C&ES. As explained in PG&E's 2023 GRC,[4] PG&E has implemented the Lean Operating System to make results visible across the entire Company for immediate evaluation and to support informed, timely action and continuous improvement. As part of the reorganization, the Enterprise Lean Office reports to the Executive Vice President and Chief Customer and Enterprise Solutions Officer. In addition, a new Enterprise Technology Modernization team reports to the Executive Vice President of C&ES. This team supports the Foundational Capabilities component of the Company's True North Strategy[5] which includes enhancing our end-to-end work production system to improve work efficiency and throughput.

Ultimately, the C&ES functional area consolidates the Enterprise Lean Office, Enterprise Technology Modernization, and Regional Service Model[6] under the leadership of an Executive Vice President to coordinate delivery of these foundational initiatives that drive better performance, service, and outcomes, across the Company. In addition, C&ES continues to include key customer support teams from the former Customer and Communications organization, including Marketing and Communications, Customer Experience, and Local Customer Engagement. Figure 1-1 provides an overview of the organizational structure for PG&E's C&ES functional area.

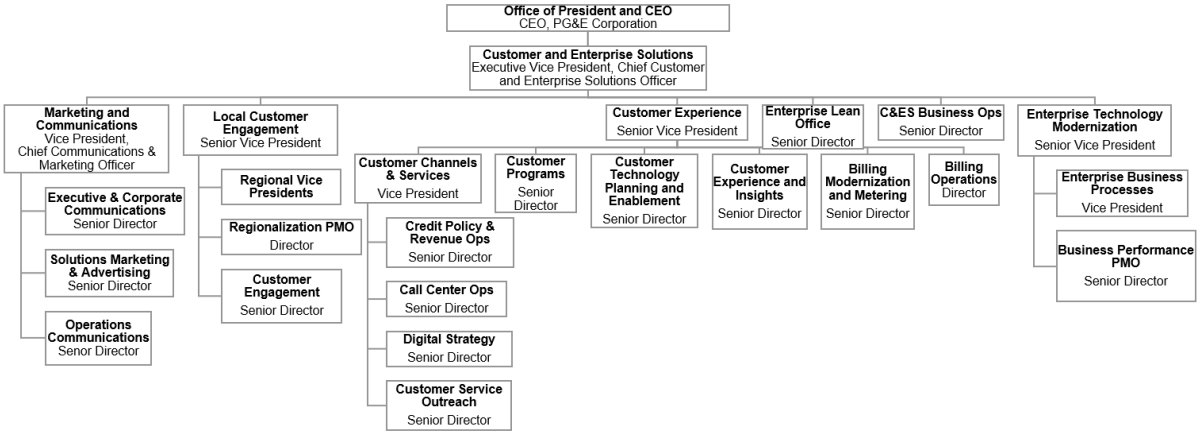
---

4 Application (A.)21-06-021, Exhibit PGE-1, Ch. 1 in PG&E's 2023 GRC for more information on the implementation of the Lean Operating System.

5 Exhibit (PG&E-2), Ch. 2.

6 Exhibit (PG&E-1), Ch. 1.

FIGURE 1-1
CUSTOMER AND ENTERPRISE SOLUTIONS ORGANIZATIONAL CHART



2. Improving the Customer Experience with the Customer at the Heart

Since filing our 2023 GRC, we have leveraged daily customer surveys on our website and via interactive voice response (IVR) to analyze, assess, and problem solve customer experience issues via our Customer Satisfaction Score and Customer Transaction Score. From this continuous feedback loop, we have heard from our customers that their top pain points include dissatisfaction with high bills, outage experiences, confusion and frustration with IVR, unresolved issue resolution from PG&E's Contact Centers, and difficulty with completing desired tasks on PGE.com due to web errors and account access issues. Key drivers of Customer Satisfaction Score and Customer Transaction Score are reviewed daily, weekly, and monthly by senior leaders as part of our implementation of the Lean Operating System to identify trends and opportunities that can be quickly addressed or the implementation of longer-term solution changes, alongside improved coordination between operational and customer-facing teams.

For example, we have implemented enhancements to PGE.com to improve account access issues by adding an option for customers to view the password they have typed to ensure accuracy, allowing users to click a link instead of typing out complicated password reset codes, and no longer requiring customers to input their meter ID and account number for one-time access. In addition, we have started piloting the use of artificial intelligence

(AI) to improve the customer experience through our IVR. Lastly, since the permanent closure of our local Customer Service Offices in 2022, the customer service representatives (CSR) from the local offices have proactively reached out to our most vulnerable customers to assist them with bill affordability issues as part of our new Customer Service Outreach team. The team has put the customer at the heart of their operations by meeting with customers in-person at community events to help enroll them in applicable benefit programs and to provide an additional feedback channel that can be used to drive additional customer experience improvements. As a result of the Lean Operating System, we are continuously collecting and reviewing Customer Satisfaction Score and Customer Transaction Scores to assess whether our solutions are meeting customers' needs or if further adjustments or different approaches are necessary. PG&E leveraged this information to inform and prioritize investments in its 2027 forecast for the C&ES functional area.

3. Separate Applications Filed for Gas Advanced Metering Infrastructure and Billing Modernization Programs

In its 2023 GRC, PG&E proposed forecasts for its Gas Advanced Metering Infrastructure (AMI) and Billing Modernization Programs. In D.23-11-069, the Commission did not authorize the forecasts for these programs and directed PG&E to file separate applications with more details and support to recover the costs associated with these activities.[7] Since the 2023 GRC, PG&E has filed separate applications for each program.

On March 14, 2024, PG&E submitted its application for a Comprehensive Gas Advanced Metering Infrastructure Replacement Program (Application (A.) 24-03-011). In that application, PG&E requested funding for 2023-2026 to replace battery-operated gas modules that have failed or reaching end-of-life, and to begin a Gas AMI 2.0 Technology Upgrade. On March 14, 2025, PG&E, the Public Advocates Office, The Utility Reform Network, and the Small Business Utility Advocates filed a Joint Motion for Adoption of a Settlement Agreement in A.24-03-011 to resolve A.24-03-011. The Joint Motion is still pending before the

[7] D.23-11-069, pp. 545, 549-550.

Commission as of the time of filing this GRC. As discussed in Section C below, our GRC forecast also includes completion of our comprehensive Gas AMI Replacement Program during the 2027 GRC cycle.

On October 23, 2024, PG&E submitted its application for approval of its Billing Modernization Initiative (A.24-10-014). In that application, PG&E requested approval to recover 2023-2030 revenue requirements associated with a three-stage approach to comprehensively upgrading its current billing systems. This includes moving electric customers with complex billing from PG&E's Advanced Billing System (ABS) to a new Billing Cloud Services (BCS) system, updating the outdated version of Oracle Utilities Customer Care and Billing (CC&B) Version 2.4 to the current version of CC&B, and subsequently upgrading CC&B to Oracle's more advanced Customer to Meter (C2M) product and consolidating all customers in one system. The application is currently pending Commission and stakeholder review at the time of filing this GRC. PG&E is not requesting any forecasts in this GRC related to the Billing Modernization Initiative.

4. Climate Resilience Investment

Climate change continues to impact our assets and operations, from increasing wildfire risks, to causing more extreme storm conditions, more frequent and intense heat waves, and coastal and inland flooding. Given these substantial climate-driven impacts, we have begun to utilize a long-term investment perspective for climate-informed investments. This investment perspective is designed to identify those investments included in our 2027 GRC application that intentionally enhance energy system reliability or recoverability relative to projected climate-driven natural hazards. For more information on what climate resilience means at PG&E, where PG&E is on its journey to build climate resilience, and the relationship between this General Rate Case filing and PG&E's climate resilience journey, please see Exhibit (PG&E-2), Chapter 1.

At present, a climate-informed investment considers whether an investment is primarily motivated as a response to natural hazard conditions impacted by climate change. Furthermore, a climate-informed investment must also meet one of the following conditions and be either: a wildfire investment; directly addresses a vulnerability identified in the 2024 Climate

Adaptation and Vulnerability Assessment (CAVA);[8] or be supported by a design standard that has been updated using climate projection data about future operating conditions or other climate-informed analysis.

Investments that only enhance baseline operational capabilities in response to current natural hazard conditions and do not explicitly include the consideration of future environmental conditions do not qualify as climate-informed investments.

The C&ES Exhibit includes the following climate-informed investments that are wildfire investments: Customer Emergency Planning and Operations wildfire mitigation activities[9] and Electric AMI deployment for wildfire safety and risk mitigation.[10]

C. Overview of Forecast

PG&E's 2027 forecasts for C&ES initiatives are $358.3 million expense and $380.5 million capital.

1. Expense

Table 1-1 shows C&ES 2024 recorded adjusted expenses and 2025-2027 expense forecasts by chapter. Figure 1-1 shows the 2027 expense forecast by chapter, and Figure 1-2 shows the 2024-2027 incremental expense walk organized by the chapters in this exhibit.

Figure 1-2 illustrates that the C&ES 2027 expense forecast of $358.3 million is $51.4 million greater than C&ES 2024 recorded costs of $306.9 million. Outside of escalation and forecasted increases in postage costs which are determined by the United States Postal Service, this increase reflects PG&E's focus on the following areas:

- Increased support for customers during Public Safety Power Shutoff (PSPS) events by hardening Community Resource Centers, making electrical and Americans with Disabilities Act (ADA) improvements at

---

8 PG&E submitted its first CAVA pursuant to Climate Change Adaptation Rulemaking (May 12, 2024) R.18-04-019. (See Exhibit (PG&E-2), Ch. 1 for more information). A key recommendation from this risk assessment was for PG&E to begin proactively planning for climate change by updating the design standards and further integrating climate projection information into internal planning processes.

9 See Exhibit (PG&E-6), Ch. 2, section B.4.a.

10 See Exhibit (PG&E-6), Ch. 9, section C.2.

Community Resource Centers and enhancing PSPS notifications, including in-language translations (Chapter 2).

- Improving customer experience in support of increasing electric vehicle and building electrification adoption, including development of a new AI (Chapter 2).
- Updating rate tools to help customers understand the impacts of new rates that will be in effect in 2027, increased high bill support, Medical Baseline program outreach in non-High Fire Threat Areas, Budget Billing acquisition and support, and updates to SmartRate outreach to include Net Billing Tariff (NBT) customers (Chapter 3).
- Increasing dedicated bill support outreach, which includes additional outreach in the “shoulder months” to prepare customers for higher bills anticipated in the winter and summer months, support for data analytics to segment customers so that they receive more relevant outreach, and increasing information provided to customers about anticipated rate changes and how it may change their bills (Chapter 4).
- Expanding our capabilities to measure, analyze, and address feedback through our customer survey platform, including expanding the scope of the surveys (i.e., to include customer programs, case completion, field work, etc.) and implementing enhanced speech analytics at the Contact Centers that is integrated with our survey platform to improve quality assurance, agent coaching, and call analytics (Chapter 5).
- Increasing support for energy and non-energy collections to help customers access bill assistance programs and reduce accounts receivables following the accumulation of arrearages during the COVID-19 pandemic (Chapter 6).
- Implementing EV submetering, a new initiative that will provide customers with a technical solution that is fully integrated with PG&E's AMI data and billing system, allowing customers to more easily manage their energy usage (Chapter 7).
- Continuing the Gas AMI Program by replacing the approximately 1.3 million remaining legacy battery-operated gas modules and implementing the necessary upgrades or replacement of certain

components of PG&E's Gas AMI system to mitigate technology obsolescence and other market risks (Chapter 8).

- Implementing a new Electric AMI Program which aims to strategically deploy approximately 320,000 next-generation electric smart meters, enable applications on these meters, and implement necessary improvements to its Electric AMI system (Chapter 9).
- Ensuring the enterprise deployment of PG&E's Lean Operating System which facilitates continuous improvement and waste elimination at all levels of the Company (Chapter 10).
- Ongoing support of critical technology systems that enable business operations and customer facing technology to provide information or services (Chapter 11).

TABLE 1-1
C&ES EXPENSES BY YEAR BY CHAPTER (2024-2027)
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	Chapter	Description	2024 Recorded Adjusted	2025 Forecast	2026 Forecast	2027 Forecast
1	2	Local Customer Engagement	$48,049	$50,375	$49,551	$66,819
2	3	Customer Programs	20,625	21,241	23,265	28,135
3	4	Customer Communications	23,564	20,654	20,745	25,266
4	5	Customer Service	83,570	84,137	73,900	87,800
5	6	Billing, Revenue, and Credit	76,714	73,736	77,644	90,595
6	7	Metering Services and Engineering	5,248	6,373	6,204	7,733
7	8	Gas AMI Program	1,286	1,350	1,323	2,035
8	9	Electric AMI Program	55	200	260	2,528
9	10	C&ES Business Operations	40,530	42,500	43,527	42,640
10	11	C&ES Technology Value Streams	7,266	8,269	9,315	4,718
11		Total Expenses[(a)]	$306,908	$308,835	$305,734	$358,269

(a) This total does not include the costs associated with PG&E's request to recover recorded costs from 2021-2024 for the Mobile Home Park Utility Upgrade Program. For more information, see Exhibit (PG&E-6), Ch. 12.

FIGURE 1-2
C&ES 2027 EXPENSE FORECAST BY CHAPTER
(THOUSANDS OF NOMINAL DOLLARS)

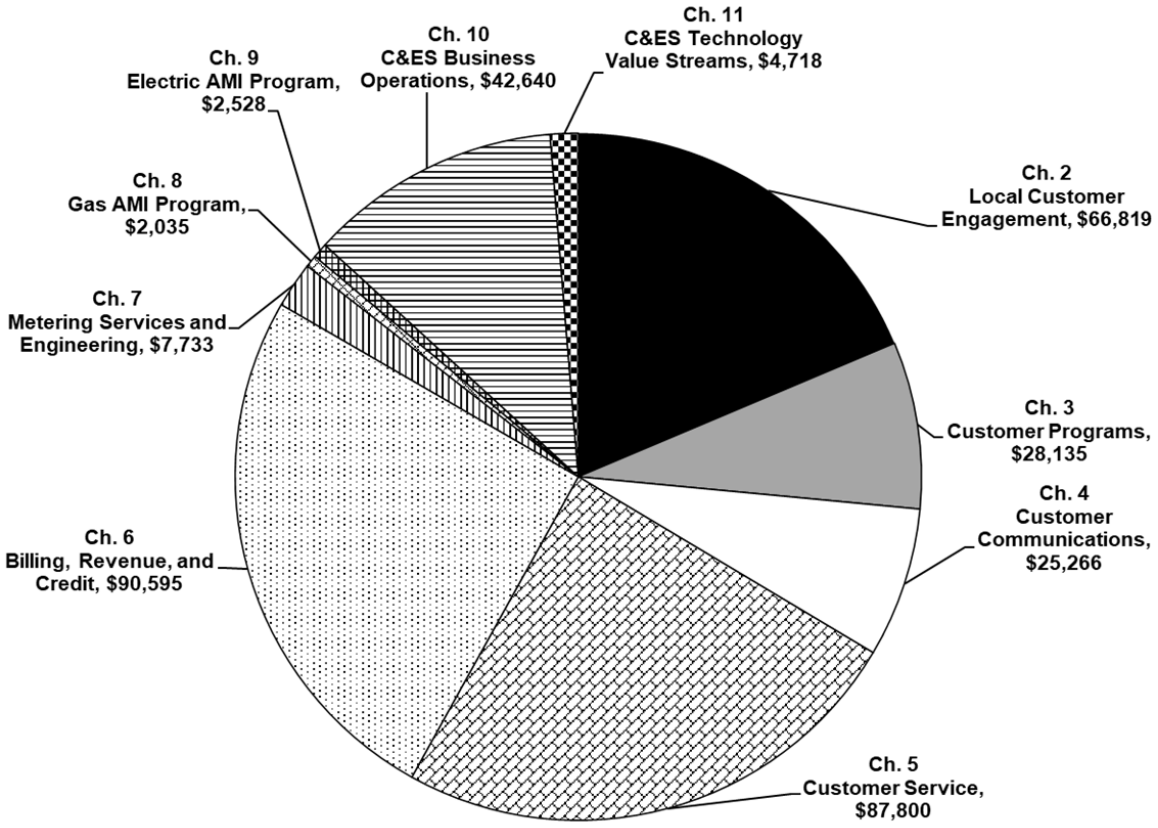
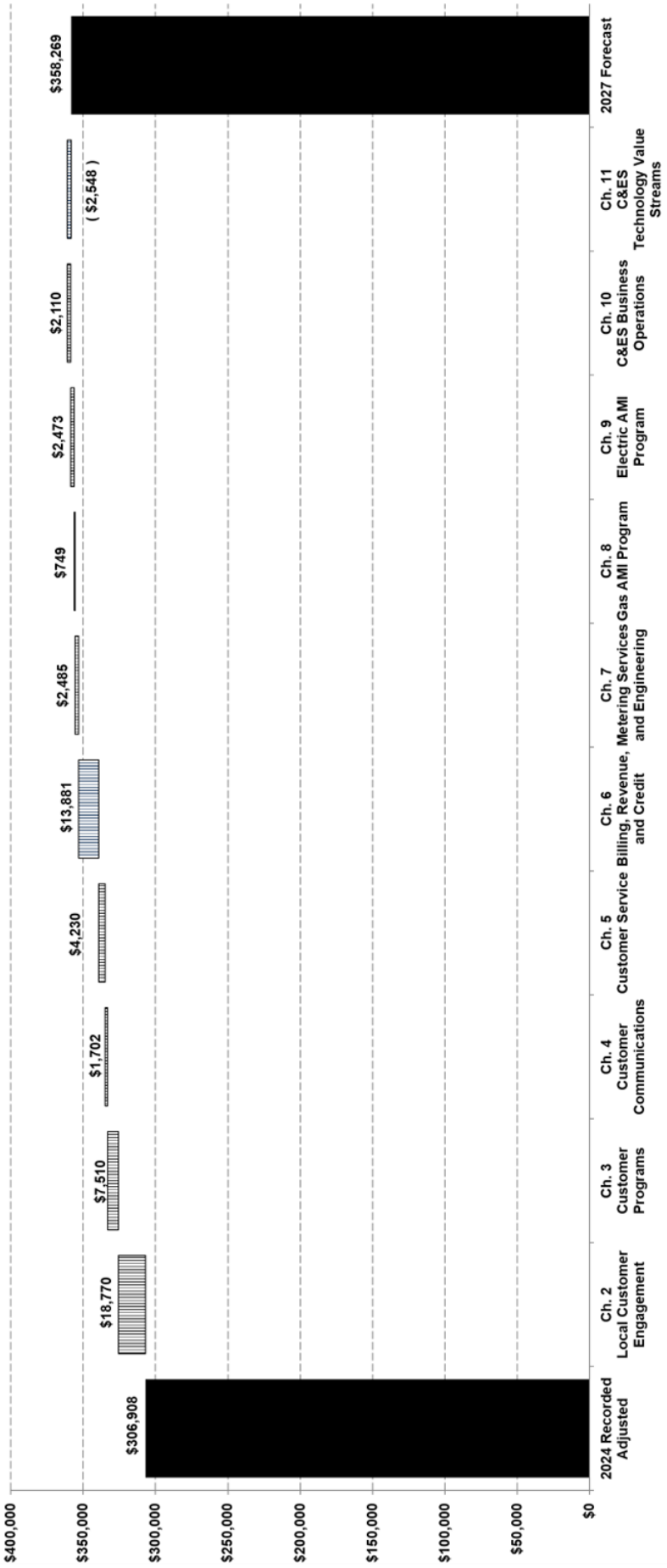


FIGURE 1-3
C&ES 2024-2027 EXPENSE WALK BY CHAPTER
(THOUSANDS OF NOMINAL DOLLARS)



2. Capital

Table 1-2 shows C&ES 2024 recorded adjusted capital expenditures and its 2025-2030 capital expenditures forecasts by chapter. Figure 1-3 identifies the 2027 capital expenditures forecast for C&ES by chapter and Figure 1-4 shows the 2024-2027 incremental capital expenditures walk.

Figure 1-4 illustrates that the C&ES 2027 capital forecast of $380.5 million is $110.9 million greater than C&ES 2024 recorded costs of $269.6 million. This increase reflects PG&E's focus on the following areas:

- Scaling gas ultrasonic meters (USMs) deployment,[11] improving large gas meter communication, and replenishing gas bulk module inventory needed for gas meter integration[12] (Chapter 7).
- Continued support for PG&E's Gas AMI Program from 2027-2030 to replace approximately 1.3 million remaining legacy battery-operated gas modules and the necessary upgrades or replacement of certain components of PG&E's Gas AMI system to mitigate technology obsolescence and other market risks (Chapter 8).
- Launching a new Electric AMI Program to recover 2027-2030 costs to strategically deploy approximately 300,000 next-generation electric smart meters, enable distributed intelligence applications on these meters, and implement necessary improvements to its Electric AMI system (Chapter 9).
- Customers' increasing technology use on different devices (e.g., laptops, tablets, phones) requires PG&E to perform application development, improvement, and advanced integrations across these coordinated systems (Chapter 11).

---

11 PG&E plans to begin scaling-up Gas USMs in the GRC 2027 timeframe and the deployment costs are forecasted in this Chapter. Reference Comprehensive Gas AMI Application (A.) 24-03-011 filed to the CPUC in March 2024 for information on PG&E's USM pilot between 2023-2026.

12 PG&E receives fully integrated gas meters that includes a gas module which is externally pre-attached to every gas meter by gas meter vendor(s). This process involves purchasing bulk gas modules which are shipped to gas meter vendor(s) so that they can furnish PG&E with a fully integrated gas meter with a pre-attached module. Furthermore, these gas meters are used for the Company's Gas Meter Maintenance Program as described in Section 5 of Exhibit (PG&E-6), Ch. 7.

TABLE 1-2
CAPITAL EXPENDITURES BY YEAR BY CHAPTER (2024-2030)
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	Chapter	Description	2024 Recorded Adjusted	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029 Forecast	2030 Forecast
1	2	Local Customer Engagement	$7,057	$3,302	$3,302	$121	$124	$127	$130
2	3	Customer Programs	14	-	-	-	-	-	-
3	4	Customer Communications	1	-	-	-	-	-	-
4	5	Customer Service	87	75	-	-	-	-	-
5	6	Billing, Revenue, and Credit	1,563	3,190	11,190	$6,815	$2,883	$2,952	$3,023
6	7	Metering Services and Engineering	104,753	110,593	105,403	134,195	136,062	130,714	136,285
7	8	Gas AMI Program	89,040	122,237	121,737	127,925	124,644	105,839	83,494
8	9	Electric AMI Program	-	50	800	44,491	58,514	50,023	34,662
9	11	C&ES Technology Value Streams	67,117	45,401	41,756	66,969	66,194	68,094	71,648
10		Total Capital[(a)]	$269,632	$284,848	$284,188	$380,516	$388,421	$357,749	$329,242

(a) This total does not include the costs associated with PG&E's request to recover recorded costs from 2021-2024 for the Mobile Home Park Utility Upgrade Program. For more information, see Exhibit (PG&E-6), Ch. 12.

FIGURE 1-4
2027 CAPITAL EXPENDITURES FORECAST BY CHAPTER
(THOUSANDS OF NOMINAL DOLLARS)

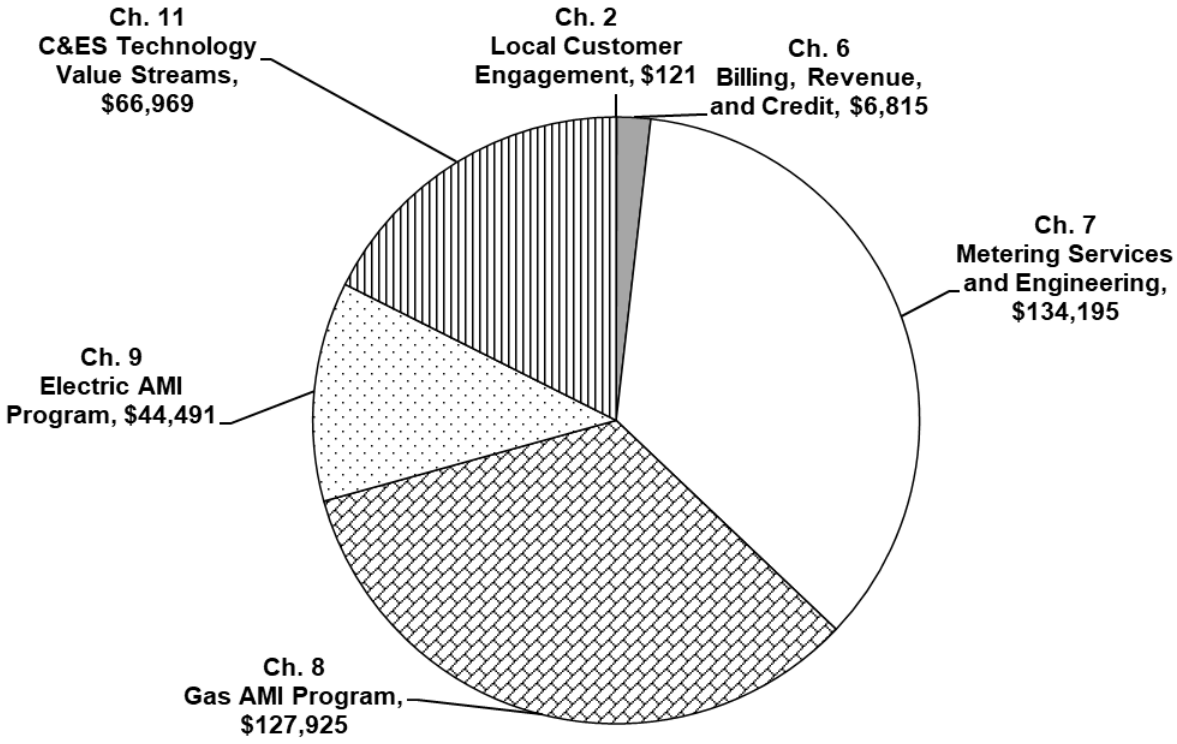
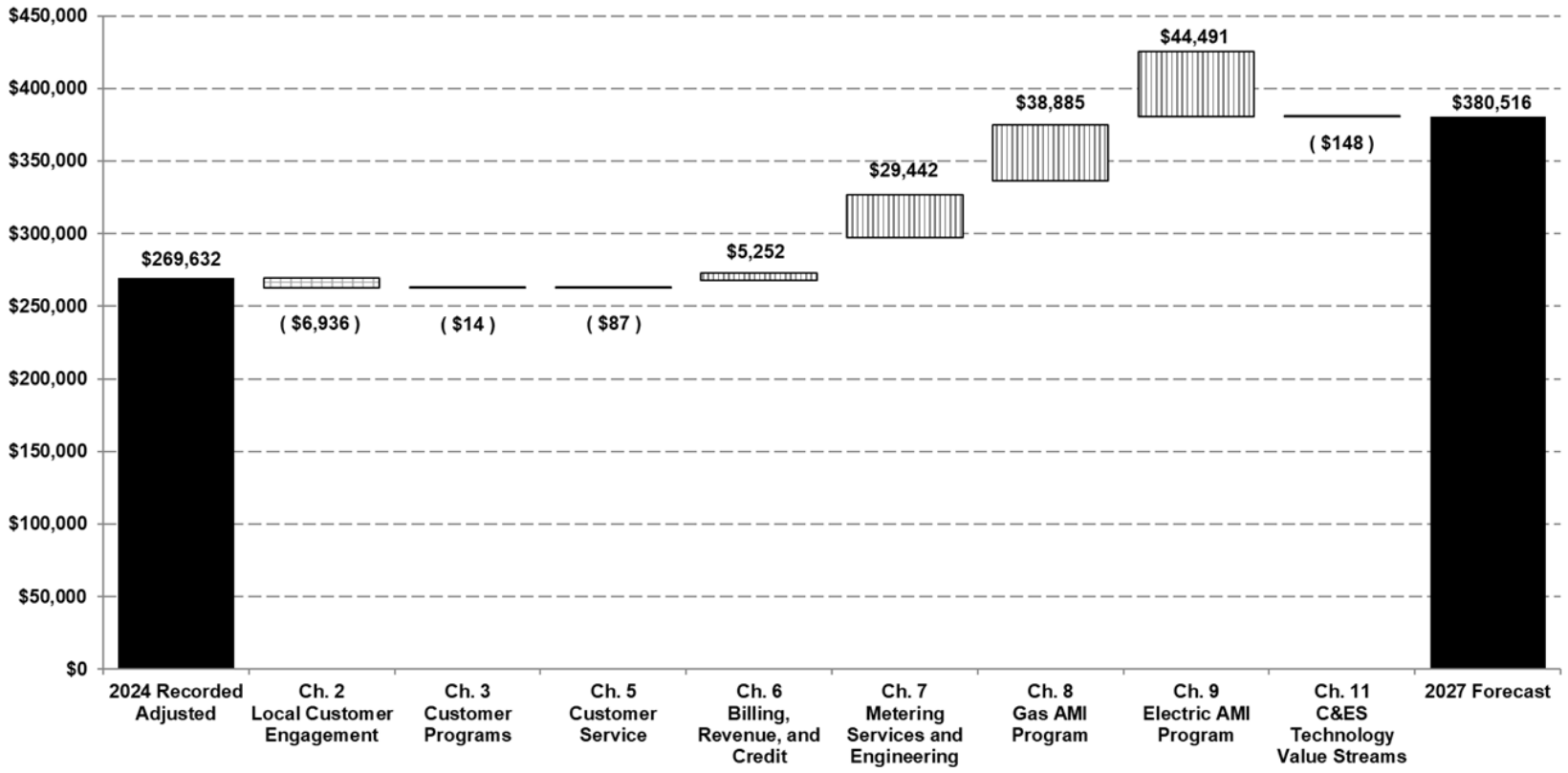


FIGURE 1-5
CAPITAL EXPENDITURES WALK (2024-2027)
(THOUSANDS OF NOMINAL DOLLARS)



D. Customer and Enterprise Solutions Exhibit Roadmap

1. Chapter 2: Local Customer Engagement

This chapter presents PG&E's Local Customer Engagement expense and capital forecast, which supports the following six program areas: Business Energy Solutions, Community Vitality, Customer Outreach, Customer Emergency Planning and Operations, Regional Service Model, Transportation and Building Electrification, New Revenue Development, and Data and Energy Management Products.

2. Chapter 3: Customer Programs

This chapter presents PG&E's expense forecast for Customer Programs, which includes Pricing Products and Income Qualified Programs. Pricing Products activities primarily support rate programs and rate structure changes. The chapter also requests funds for Income Qualified Programs initiatives that are not funded by Public Purpose Program funds or greenhouse gas revenues, including Natural Gas Appliance Testing, DAC and community -based organization engagement activities, maintenance of the Low-Income Home Energy Assistance Program Portal, Cooling Centers, and the Food Bank Discount Program. Further, this chapter presents a Memorandum of Understanding with the National Diversity Coalition regarding the delivery of programs and supporting the needs of underserved communities including communities of color.[13]

3. Chapter 4: Customer Communications

This chapter presents PG&E's expense forecast for outreach, education, and engagement with customers, employees, media, and the public on essential topics such as safety, bill support, and region-specific updates.

4. Chapter 5: Customer Service

This chapter presents PG&E's expense forecast for management and operation of PG&E's Contact Centers, Customer Technology Planning and Enablement, Digital Strategy, and Customer Insights and Strategy teams. This includes costs for PG&E's two contact centers, customer notifications,

---

13 See Exhibit (PG&E-6), Ch. 3, Attachment A.

digital and mobile channels, management of C&ES IT projects, and customer research and analytics.

5. Chapter 6: Billing, Revenue, and Credit

This chapter presents PG&E's expense and capital forecasts for Billing, Revenue, and Credit, which is responsible for issuing customer bills and notices, processing payments, and billing exceptions, conducting credit and collection activities, and reporting revenue.

6. Chapter 7: Metering Services and Engineering

This chapter presents PG&E's expense and capital forecasts for its Metering Services and Engineering programs. The chapter also presents PG&E's SmartMeter™ Cost Effectiveness Update in compliance with D.19-10-038, Ordering Paragraph (OP) 1.[14]

7. Chapter 8: Gas Advanced Metering Infrastructure Program

This chapter presents PG&E's expense and capitals forecasts for its Gas AMI Program, which seeks to maintain, upgrade, and replace (as necessary) the Company's legacy Gas AMI as it reaches its expected useful lifespan. This includes the replacement of approximately 1.3 million remaining legacy battery-operated gas modules and the necessary upgrades or replacement of certain components of PG&E's Gas AMI system to mitigate technology obsolescence and other market risks.

8. Chapter 9: Electric Advanced Metering Infrastructure Program

This chapter presents PG&E's expense and capital forecasts for its Electric AMI Program, which aims to strategically deploy approximately 320,000 next-generation electric smart meters, enable applications on these meters, and implement necessary improvements to its Electric AMI system.

9. Chapter 10: C&ES Business Operations

This chapter presents PG&E's expense forecast for the Enterprise Lean Office, C&ES Business Operations and Strategy, UP&I Business Operations, C&ES Risk and Compliance, C&ES Operational Management and Operational Support costs, and UP&I Operational Management costs.

---

14 See Exhibit (PG&E-6), Ch. 7, Attachment A.

10. Chapter 11: C&ES Technology Value Streams

This chapter presents PG&E's expense and capital forecasts for technology projects that support PG&E's C&ES functional area. These projects enable the development of applications for customers to use when they need information about products and services or to complete a transaction around account setup or payment of a service. Dedicated improvements to features and functionality for applications and IT services create a seamless experience for customers, regardless of level of access to different types of technology.

11. Chapter 12: Mobile Home Park Utility Upgrade Program

This chapter demonstrates the reasonableness of PG&E's costs incurred for the 58 projects completed from January 1, 2021 to December 31, 2024 through the Mobile Home Park Program. This chapter serves as a reasonableness review for the costs of program activities pursuant to D.14-03-021, Ordering Paragraph (OP) 8 and D.20-04-004, OP 1.

E. Balancing and Memorandum Accounts

PG&E includes proposals related to memorandum and balancing accounts as described in further detail below.

1. Non-Tariffed Products and Services Balancing Account

As discussed in Exhibit (PG&E-6), Chapter 2, and Exhibit (PG&E-10), Chapter 16, the Non-Tariffed Products and Services Balancing Account (NTBA) provides a mechanism whereby customers and shareholders split net profits 50/50 for the one New Revenue Development (NRD) program that currently applies to the NTBA, the Mover Services program. PG&E requests that the NTBA be modified to include the recording of amounts related to all CPUC-jurisdictional NRD programs and apply the existing 50/50 net profit sharing mechanism between ratepayers and shareholders. Furthermore, all NRD expense will be borne by shareholders beginning in 2027.

2. Non-Tariffed Products and Services Memorandum Account

As discussed in Exhibit (PG&E-6), Chapter 2, and Exhibit (PG&E-10), Chapter 16, the Non-Tariffed Products and Services Memorandum Account (NTPSMA) tracks actual net profits related to PG&E's NRD Non-Tariffed

Products and Services for the 2023 GRC rate case cycle. Future actual revenue and expense is proposed to be tracked in the NTBA and split 50/50 between shareholders and ratepayers. The NTPSMA will be closed once the Commission reviews the results of the 2023-2026 recorded actuals in the NTPSMA.

3. Regional Plan Memorandum Account

As discussed in Exhibit (PG&E-6), Chapter 2, and Exhibit (PG&E-10), Chapter 16, the Regional Plan Memorandum Account (RPMA) tracks and records the incremental costs incurred related to developing and implementing PG&E's Regionalization Plan. PG&E has developed a reasonable forecast of program costs starting in 2027 and included that forecast as part of this GRC, rendering the account no longer necessary. PG&E proposes to close the account following the Commission's review of the costs recorded to the account through 2026.

4. California Distributed Generation Statistics Website Memorandum Account – 2

As discussed in Exhibit (PG&E-6), Chapter 3, the California Distributed Generation Statistics Website Memorandum Account-2 (CDGSWMA-2) tracks incremental costs during the 2023 GRC rate case cycle for work performed by a contractor to support Distributed Generation Statistics, which is the Commission's official public reporting site of all distributed generation projects in California's investor-owned utility service territories.[15] PG&E has included a forecast of program costs for ongoing support of the website as part of this GRC, rendering this account no longer necessary. PG&E proposes to close the account following the Commission's review of the costs recorded in the account through 2026.

F. Compliance with Prior Commission Decisions

Table 1-3 below presents the compliance requirements from prior decisions issued by the Commission and identifies the chapters in this exhibit where PG&E's actions to comply with each requirement are described. Non-recurring

---

[15] For more information, see California Distributed Generation Statistics, available at: <www.californiadgstats.ca.gov> (accessed April 16, 2025).

prior compliance items and those that were completed prior to the filing of this GRC are not included in Table 1-3.

TABLE 1-3
OVERVIEW OF COMPLIANCE ITEMS

Line No.	Directive	Topic	Reference
1	D.23-11-069, OP 45	Regionalization	Exhibit (PG&E-6), Chapter 2
2	D.23-11-069, OP 45	New Revenue Development Audit	Exhibit (PG&E-6), Chapter 2
3	D.17-12-009, OP 114	Cooling Centers Forecast	Exhibit (PG&E-6), Chapter 3
4	D.15-10-032, p. 21	Gas GHG Compliance Administrative Costs Forecast	Exhibit (PG&E 6), Chapter 3
5	Resolution E-5030, OP 6	California Distributed Generation Statistics Memorandum Account Cost Recovery	Exhibit (PG&E 6), Chapter 3
6	D.22-12-033, OP 6	Continuation of Customer Service Office Transformation Program	Exhibit (PG&E 6), Chapter 5
7	D.07-09-041, OP 11, p. 50	Delayed and Estimated Bills and Uncollectibles Due to Rule 17.1 Time Limits	Exhibit (PG&E-6), Chapter 6
8	D.20-12-005, OP 16	Residential Disconnections	Exhibit (PG&E-6), Chapter 6
9	D.14-12-078, OP 5 and 6	SmartMeter Opt-Out	Exhibit (PG&E-6), Chapter 7
10	D.19-10-038, OP 1	SmartMeter Cost Effectiveness Update	Exhibit (PG&E-6), Chapter 7
11	D.14-03-021, OP 8	Mobile Home Park Conversion Program Cost Recovery	Exhibit (PG&E-6), Chapter 12

G. Conclusion

PG&E requests that the Commission adopt PG&E's forecasts of expense and capital expenditures for the C&ES functions described in this exhibit.

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 2

LOCAL CUSTOMER ENGAGEMENT

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 2
LOCAL CUSTOMER ENGAGEMENT

TABLE OF CONTENTS

A. Introduction and Summary 2-1
1. Overview 2-1
2. Summary of Request 2-2
a. Expense 2-4
b. Capital 2-5
B. Local Customer Engagement Forecast 2-6
1. Business Energy Solutions (MWC IV) 2-6
a. Overview 2-6
b. Costs and Forecast 2-8
2. Community Vitality (MWCs IV, FK) 2-9
a. Overview 2-9
b. Costs and Forecast 2-11
3. Customer Outreach (MWC DK) 2-11
a. Overview 2-11
b. Costs and Forecast 2-12
4. Customer Emergency Planning and Operations (MWCs IG, 21) 2-13
a. Overview 2-13
1) Public Safety Power Shutoff (PSPS) – Customer Programs 2-14
2) Community Resource Centers 2-20
3) California 211 Providers Network 2-22
b. Costs and Forecast 2-23
5. Regional Service Model (RSM) (MWC JV, EZ, AB, 2F) 2-25
a. Overview 2-25
b. Costs and Forecast 2-28

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 2
LOCAL CUSTOMER ENGAGEMENT

TABLE OF CONTENTS
(CONTINUED)

6. Transportation and Building Electrification (MWC GM) 2-28
a. Overview 2-28
1) Streamlining the Customer Experience to Drive TE and BE Adoption and Create Downward Rate Pressure 2-30
2) Leveraging Flexible Load to Drive Increased Value 2-34
3) O&M of PG&E-Operated Charging Stations 2-36
b. Costs and Forecast 2-38
7. New Revenue Development (MWC EL) 2-41
a. Overview 2-41
b. Costs and Forecast 2-43
1) 2023 GRC Decision 2-44
2) Detailed Accounting 2-44
3) Ratepayer and Shareholder Benefit History 2-45
4) Shareholders Bear Any Risk of Potential Loss 2-46
5) Current Revenue Sharing Mechanism for All Categories and Proposal for 50/50 Split 2-46
6) Benefits to Ratepayers (Financial and Operational) 2-47
7) How The Program Aligns With the Commission's Affiliate Transaction Rules 2-48
8) External Audit 2-48
c. Accounts 2-49
1) Modify Accounts 2-49
2) Discontinue Accounts 2-49
8. Data and Energy Management Products (DEMP) 2-50
a. Overview 2-50

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 2
LOCAL CUSTOMER ENGAGEMENT

TABLE OF CONTENTS
(CONTINUED)

b. Costs and Forecast 2-51

C. Compliance 2-53

1. Regionalization 2-53

2. Report Pursuant to 2023 GRC Memorandum of Understanding Between Small Business Utility Advocates and PG&E on Supplier Diversity Initiatives 2-54

D. Accounts 2-54

1. California Network of 211 2-54

2. Regional Plan Memorandum Accounts 2-55

E. Conclusion 2-55

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 2
LOCAL CUSTOMER ENGAGEMENT

A. Introduction and Summary

1. Overview

The purpose of this chapter is to discuss PG&E's capital and expense forecasts for activities associated with Local Customer Engagement. Local Customer Engagement provides essential services and benefits to PG&E's customers through direct customer service and customer programs. Specifically, Local Customer Engagement's expense and capital forecasts support the following eight program areas:

1) Business Energy Solutions;
2) Community Vitality and Economic Development;
3) Customer Outreach;
4) Customer Emergency Planning and Operations;
5) Regional Service Model (RSM);
6) Transportation and Building Electrification;
7) New Revenue Development (NRD) and non-tariffed products and services that were previously authorized through 2024; and
8) Data and Energy Management Products.

The work described in this chapter provides significant benefits to customers by enhancing their overall service experience, improving safety and satisfaction. For example, certain initiatives provide direct support to non-residential customers, helping them manage their accounts, enroll, and participate in clean energy programs, and support vehicle and building electrification efforts. Other work promotes customer choice by supporting alternative energy providers and fostering economic development to retain and attract businesses within PG&E's service territory. The Local Customer Engagement forecast also supports wildfire mitigation and minimizes the impact to customers during Public Safety Power Shutoff (PSPS) events, ensuring they receive necessary support and resources. Overall, these programs aim to enhance customer engagement, support clean energy initiatives, and ensure customer safety and satisfaction.

The Commission's final decision in PG&E's 2023 GRC authorized ratepayer funding for New Revenue Development through 2024, with shareholder funding from 2025-2026, and required PG&E to request approval of the New Revenue Development program to continue with ratepayer funding after 2026. PG&E responds to that directive here. Please see Section B.7 for further discussion.

2. Summary of Request

PG&E requests the Commission approve the following:

- Adopt the expense forecasts in Section A.2, Table 2-1;
- Adopt the capital expenditure forecasts in Section A.2, Table 2-2;
- Discontinue the Regional Plan Memorandum Accounts (RPMAs);
- Modify the Non-Tariffed Products and Services Balancing Accounts (NTBAs); and
- Discontinue the Non-Tariffed Products and Services Memorandum Account (NTPSMA).

TABLE 2-1
LOCAL CUSTOMER ENGAGEMENT
SUMMARY OF EXPENSE
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted 2020	2021	2022	2023	2024	Forecast 2025	2026	2027
1	AB	Misc Expense	–	$1,331	$1,509	$1,141	$1,919	–	–	–
2	DK	Manage Customer Inquiries	1,344	1,332	2,066	1,748	1,570	1,693	1,748	1,804
3	EZ	Manage Var Cust Care Processes	1,885	4,779	9,617	11,415	11,571	13,070	12,814	15,032
4	FK	Retain & Grow Customers	356	616	454	317	403	391	401	412
5	GM	Manage Energy Efficiency-NonBA	1,570	1,772	1,733	2,382	1,738	2,390	1,527	9,824
6	IG	Manage Var Bal Acct Processes	31,450	26,691	21,643	16,834	14,993	18,815	19,341	20,011
7	IV	Provide Account Services	14,965	14,949	13,224	14,272	15,164	13,042	12,620	19,737
8	JV	Maintain IT Apps & Infra	–	20	319	772	689	1,094	1,219	–
9		Total	$51,570	$51,491	$50,565	$48,880	$48,049	$50,375	$49,551	$66,819

TABLE 2-2
LOCAL CUSTOMER ENGAGEMENT
SUMMARY OF CAPITAL
(THOUSANDS OF NOMINAL DOLLARS)

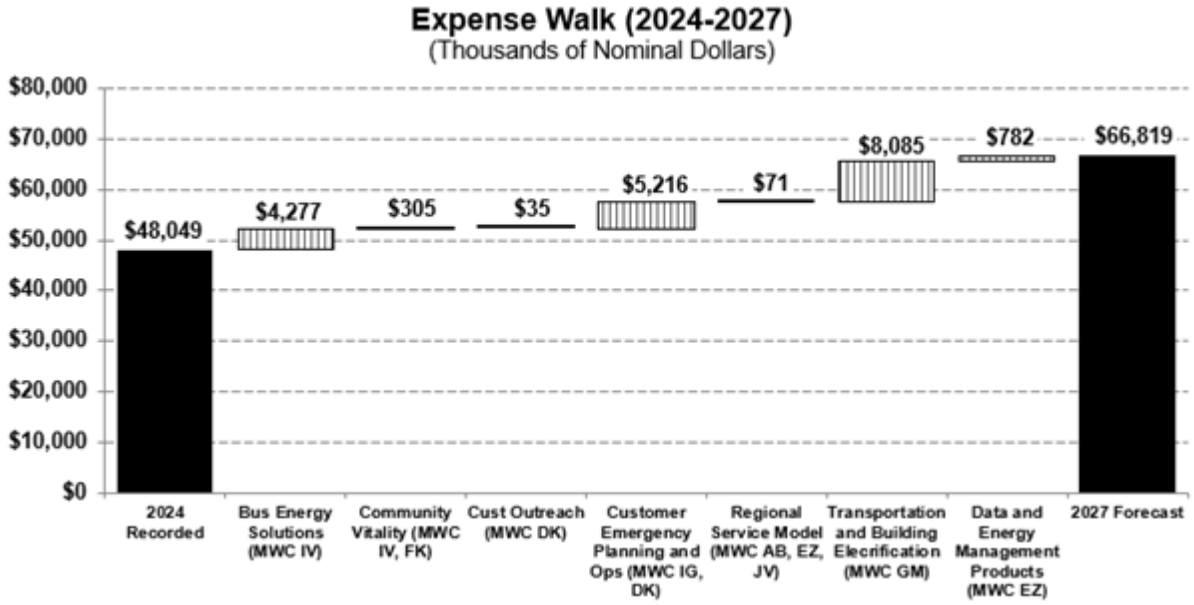
Line No.	MWC	Description	Recorded Adjusted 2020	2021	2022	2023	2024	Forecast 2025	2026	2027	2028	2029	2030
1	21	Misc Capital	$1,021	$146	$(16)	$5	$3	$114	$114	$121	$124	$127	$130
2	2F	Build IT Apps & Infra	8	–	5,256	7,611	7,054	3,187	3,187	–	–	–	–
3		Total	$1,029	$146	$5,240	$7,616	$7,057	$3,302	$3,302	$121	$124	$127	$130

a. Expense

Given the complex nature of the respective departments, some MWCs may not divide into workstreams on a 1:1 basis. To better understand the MWCs and their relationship with the eight departments discussed below, please refer to Exhibit (PG&E-6) WP 2-27.

Figure 2-1 provides an expense walk identifying key drivers for the difference in the 2027 forecast as compared to 2024 recorded. Each driver is summarized below.

FIGURE 2-1
LOCAL CUSTOMER ENGAGEMENT



PG&E is forecasting an increase in expense of $18.8 million over 2024 recorded adjusted costs of $48.0 million for Local Customer Engagement work. The primary drivers of increases and decreases are as follows:

- $4.3 million increase for Business Energy Solutions (MWC IV), mainly attributable to the Large Enterprise Accounts Team, reflecting a change in service type for account managers, from an energy efficiency focus to broader customer support in work that is largely GRC funded. Please see section B.1 for more details;
- $0.3 million increase is attributable to Community Vitality (MWCs IV, FK) and the continuing expansion of Community Choice Aggregators (CCA) throughout

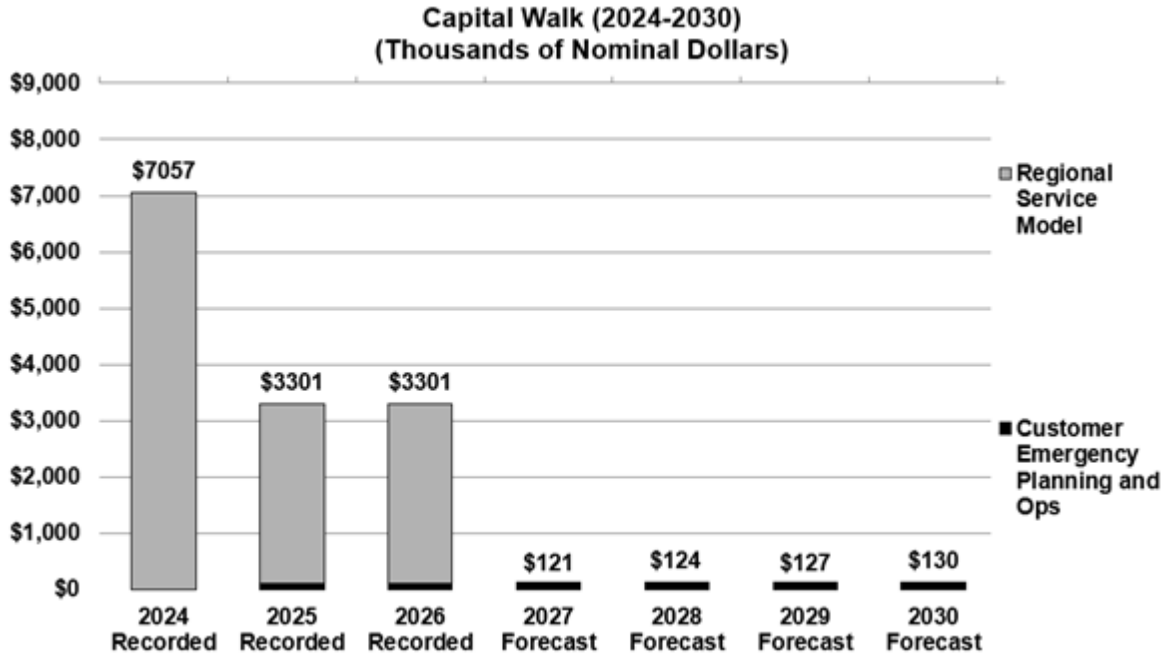
PG&E territory and the services that existing CCAs provide. Please see section B.2 for more details;

- $0.04 million increase for Customer Outreach (MWC DK). Please see section B.3 for more details;
- $5.2 million increase for Customer Emergency Planning and Operations (MWCs IG, DK), attributable to an increase in Community Resource Centers hardening costs and PSPS non-event costs for construction costs related to electrical and ADA-related work at additional Community Resource Centers, and for substantial customer notification enhancements (including language translation) ensuring compliance with regulatory requirements. Please see section B.4 for more details;
- $0.07 million increase for Regional Service Model, which reflects $2.66 million increase to MWC EZ, $0.689 million decrease to MWC JV, and $1.919 million decrease to MWC AB. Prior to 2027, Regional Service Model costs were tracked in the RPMAs (please see section B.5).
- $8.1 million increase for MWC GM, attributable to existing and incremental Transportation and Building Electrification initiatives, detailed in section B.6;
- $0.8 million increase for MWC EZ, attributable to Data and Energy Management Products (DEMP) for one additional FTE, escalation, shift in costs being charged to other PG&E departments, and impacts on DEMP from PG&E IT projects. Please see section B.8 for more details; and
- PG&E is not requesting ratepayer funding for New Revenue Development. Please see Section B.7 for more details.

b. Capital

Figure 2-2 provides a capital walk identifying key drivers for the difference in the 2027-2030 forecast as compared to 2024 recorded. Each driver is summarized below.

FIGURE 2-2
LOCAL CUSTOMER ENGAGEMENT



PG&E is forecasting a significant reduction in capital expenditures in 2027 relative to the 2024 recorded amount. The main drivers of the capital costs are:

- $3.3 million for MWC 2F, in 2025 and 2026 attributable to the Regional Service Model; and
- $0.1 million for MWC 21 in 2025 and 2026, $0.1 million in 2027, $0.1 million in 2028, $0.1 in 2029, and $0.1 million in 2030, attributable to Community Resource Centers' Hardening costs under the Customer Emergency Planning and Operations team.

B. Local Customer Engagement Forecast

1. Business Energy Solutions (MWC IV)

a. Overview

Business Energy Solutions provides direct non-residential customer support through proactive and reactive management of customer accounts. Business Energy Solutions consists of the Large Enterprise Accounts and Customer Success teams, and Small Business Engagement.

Large Enterprise Accounts

The Large Enterprise Accounts team provides account management to large, medium, and complex customers. PG&E has over 4,400 large enterprise accounts, of which approximately 3,200 are assigned directly to a customer relationship manager.

The focus of the Large Enterprise Accounts team is to assist customers with their utility service needs, manage customer accounts, educate and enroll customers in clean energy programs, electrification efforts, and support for emergency operations including before, during, and after PSPS events. Beyond energy efficiency, a major focus of the Large Enterprise Accounts team is supporting Vehicle-Grid Integrations and building electrification. This includes support for electric generation interconnections, new construction, and micro-grid and storage options.

The Customer Success team partners with Large Enterprise Accounts to support business customer-focused service options and drive resolution of business customer service issues by working with various internal PG&E partners such as Billing Operations, Rates and Tariffs, Electric and Gas Operations, Service Planning, Electric Generation Interconnections, and Metering. The Customer Success team is the primary point of contact for all customer generators interconnected to PG&E's transmission infrastructure. The Customer Success team also develops and executes PG&E's communication and contract management with non-core gas customers receiving service under a Natural Gas Service Agreement (NGSA).

Small Business Engagement

The Small Business Engagement team supports approximately 320,000 small and medium business customers (SMB) by onboarding new business customers through proactive outbound outreach and participating in community business organization meetings and events. The SMB team provides support for rate options, online tools, Energy Efficiency, integrated demand-side management opportunities, and outreach to hard-to-reach communities. Small Business Engagement team also supports a variety of outreach and research contracts that design and deliver SMB-focused products and services.

TABLE 2-3
BUSINESS ENERGY SOLUTIONS
SUMMARY OF EXPENSE
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted 2020	2021	2022	2023	2024	Forecast 2025	2026	2027
1	IV	Provide Account Services	$13,179	$13,322	$11,402	$12,821	$13,956	$11,591	$11,170	$18,233
2		Total	$13,179	$13,322	$11,402	$12,821	$13,956	$11,591	$11,170	$18,233

b. Costs and Forecast

PG&E is forecasting an increase of $4.277 million in 2027 relative to 2024 recorded costs for MWC IV, which reflects the expanded scope of account managers' work to support GRC-funded initiatives related to new construction, expansion of electric/gas service, metering, rates, billing and payment support, electric and gas reliability, Electric Generation Interconnections (EGI), fleet electrification and Vehicle-Grid Integration (VGI), building electrification, and others. Concurrently, there is reduced customer demand for energy efficiency work that is funded through the Public Purpose Program Surcharge.

Traditionally, the Business Energy Solutions Team has allocated a significant portion of its labor hours to promote energy efficiency efforts. These initiatives are funded through the Energy Efficiency proceeding's Annual Budget Advice Letter.[1]

In recent years, energy delivery needs for our largest customers have become increasingly complex, requiring additional time and support from account managers. Between 2020 and 2024, Business Energy Solutions saw a reduction in labor time billed to Energy Efficiency from 35 to 16 percent, and an increase in labor time billed to the General Rate Case from 45 to 61 percent. For 2024, the Business Energy Solutions organization had $16.7 million in total labor costs, of which $10.6 million was reflected in MWC IV (61 percent).[2] For 2027, PG&E is forecasting $17.3 million in total labor costs, of which $14.9 million is forecast in MWC IV (84 percent).[3] By 2027, PG&E expects Business Energy Solutions representatives to concentrate all

---

1 Advice Letter (AL) 4861-G/7157-E

2 Exhibit (PG&E-6), WP 2-29, line 1.

3 Exhibit (PG&E-6), WP 2-28, lines 1 and 5.

their efforts on non energy-efficiency related work.[4] Large Enterprise customers' aggressive electrification and carbon reduction targets are resulting in increased requests for support related to non-energy efficiency needs. In addition, forecasted load growth in California is expected to continue for data centers and electric vehicle chargers due to anticipated increasing EV adoption.[5] This rising demand and load growth, coupled with evolving customer needs, necessitate retiring the EE-focused charge-out-model previously used, in order to better serve customers.

As an example of the type of work Large Enterprise Account Managers now perform, in 2024, the LEA team helped execute PG&E's largest Vehicle-Grid Integration (VGI) project at 2.3MW of capacity. This first-in-the-nation project electrified 74 school buses equipped with groundbreaking vehicle-to-grid (V2G) technology, enabling the buses to return energy to the grid at scale when not in use.[6]

The Small Business Engagement Team supports customer outreach on a broad set of activities, both proactive and reactive, and includes both internal labor and contracts. Approximately $3.0 million is for contracts supporting customer programs. These customer programs include digital Software-as-a-Service and other digital tools, website support, customer research, marketing contracts, and -third-party vendor customer outreach.

2. Community Vitality (MWCs IV, FK)

a. Overview

PG&E's Community Vitality organization is comprised of the Third-Party Relations and Economic Development teams. The Third-Party Relations team are the primary contacts for the alternative gas and electric service providers operating

---

4 Exhibit (PG&E-6), WP 2-28, lines 1,3, and 4.

5 California Energy Commission (CEC)'s 2023 IEPR Forecast – AATE 3 Forecast shows a continued increase of EVs until 2040. Available at: <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.energy.ca.gov%2Fsites%2Fdefault%2Ffiles%2F2024-04%2FCA_Planning_Library_2023_IEPR_Vehicle_Populations_ada.xlsx&wdOrigin=BROWSELINK> (accessed April 30, 2025).

6 Doherty, Paul. PG&E Helps Zum Deploy Nation's First 100 % Electric School Bus Fleet in Oakland for New School Year. PG&E Currents (August 27, 2024), available at: <https://www.pge.com/en/newsroom/currents/future-of-energy/articles-4040-pge-helps-zum-deploy-nations-100-electric-school-bus-fleet-oakland-new-school-year.html> (accessed April 16, 2025).

within PG&E's service territory. The Third-Party Relations team manages the relationships with the third-party entities, helping them to establish their service and supporting the success of their daily operations. The three types of alternative energy providers within PG&E's service territory include Direct Access (DA), Core Transport Agents (CTA), and Community Choice Aggregation (CCA) programs.

The Third-Party Relations team also provides support to PG&E's customer-facing organizations by consulting and resolving issues related to third-party energy provider services. These daily interactions include customer escalations, enrollment issues, metering and billing, regulatory, credit and collections, payment, demand response, energy efficiency, and distributed generation programs support. As of April 2025, 55 percent of the annual electric system load share is CCA, while approximately 14 percent of the annual electric system load share in PG&E territory is DA. 13 percent of the annual gas system load is served by a CTA.

PG&E's Economic Development team was established to promote the Economic Development Rate (EDR). EDR is a unique rate created to help existing businesses grow or maintain their current operations and jobs. The EDR is utilized to also proactively encourage new businesses to consider operating within the PG&E service territory. By retaining and attracting new businesses in California, the EDR team supports local job creation within the communities that PG&E serves. The success of the EDR is reliant on close coordination with local and state Economic Development organizations. PG&E provides guidance on rate options, estimating costs, and responding to customer inquiries regarding establishing new utility services, determining the feasibility and reliability of potential new services, and consulting on other new service-related inquiries and resources.

TABLE 2-4
COMMUNITY VITALITY
SUMMARY OF EXPENSE
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted 2020	2021	2022	2023	2024	Forecast 2025	2026	2027
1	IV	Provide Account Services	$1,785	$1,627	$1,821	$1,450	$1,208	$1,450	$1,450	$1,504
2	FK	Retain and Grow Customers	356	616	454	317	403	391	401	412
3		Total	$2,141	$2,243	$2,275	$1,767	$1,611	$1,841	$1,851	$1,916

b. Costs and Forecast

The Community Vitality organization requests $1.5 million related to MWC IV, an increase of $0.3 million relative to 2024.[7] Recorded data from 2024 was not used as it did not represent normal operating conditions. While 2023 represented normal operating conditions at $1.5 million, 2024 saw a decrease of two employees from what has been historically needed to support the work. Adding back these two employees represents the baseline costs needed for comparison to 2027, and PG&E used standard escalation for 2027 from the 2023 recorded costs. These costs are specific to the Third-Party Relations team within Community Vitality and do not include the Economic Development team. The requested increase in budget supports the CCA, DA, and CTA teams. CCA, DA, and CTA programs continue to be offered throughout PG&E territory, and it is vital that the Third-Party-Relations team is funded to support the continued growth, customer switching, and daily operations of these entities and the customers they serve.

MWC FK supports the Economic Development team. The increase of $9,000 in budget from 2024 is necessary to continue the promotion of the Economic Development Rate throughout PG&E territory. The labor costs associated with the Economic Development Rate are funded solely through the GRC. The Economic Development Rate provides eligible customers with a discounted electric generation rate and the retention of jobs and businesses within California.

3. Customer Outreach (MWC DK)

a. Overview

The Customer Outreach (CO) organization contains three work groups supporting customer outreach and escalations.

- The **Program Manager team** leads customer outreach strategy, communications, and process implementation for over 75 critical risk reduction and safety related-electric, gas, and vegetation management programs. They provide key support to operations by developing customer outreach materials and processes consistent with these programs' scope, schedule, and customer impacts. The team also is responsible for driving process changes, modernizing outreach tools, and reporting outreach timeliness and customer touchpoint completion across programmatic outreach activities.

---

7 Exhibit (PG&E-6), WP 2-29, line 2.

- The **Field and Centralized Outreach teams** execute customer outreach strategies for gas, electric, and vegetation management programs. They review planned work and execute comprehensive customer outreach to ensure ample customer communications using letters, postcards, emails, Interactive Voice Response (IVR), text, canvassing, 1:1 engagement, answer centers and open houses. Outreach Specialists manage and resolve complex customer concerns, escalations, and refusals to enable operational success. They also provide key local insights to inform outreach strategy and ensure local community needs are voiced and represented.
- The **Customer Relations team** addresses customer complaints submitted to the Consumer Affairs Branch (CAB) of the CPUC and manages PG&E's internal Here to Help program for customer escalations. Their scope of work extends beyond gas, electric, and vegetation management and into billing, credit, service planning, and other potential customer escalation points.

TABLE 2-5
CUSTOMER OUTREACH
SUMMARY OF EXPENSE
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted 2020	2021	2022	2023	2024	Forecast 2025	2026	2027
1	DK	Manage Customer Inquiries	$894	$911	$1597	$1316	$1319	$1243	$1297	$1354
2		Total	$894	$911	$1597	$1316	$1319	$1243	$1297	$1354

b. Costs and Forecast

Since the Customer Outreach team charges directly to supported projects, MWC DK reflects the $1.354 million of Customer Outreach expense not covered by other department cost centers.

Customer Outreach supports mandated customer outreach on a variety of compliance and risk reduction programs. The Wildfire Mitigation Plan encompasses a portion of these commitments under Electric Operations and Vegetation Management. The Quarterly Regulatory Compliance Management certification (CS-108, CS-119 & CS-121) and Gas Safety Plan cover Gas Operations outreach commitments, including AB 1937 Natural Gas Pipeline Safety Act of 2011, and the County of San Benito Injunction Health and Safety Code section 41700.

Supported outreach includes programs with outreach-related compliance requirements and impacts millions of customers contacted each year to explain PG&E work in their neighborhood. Customer outreach and engagement directly impacts operational work schedules and execution, reduces customer escalations and refusals, and impacts overall customer satisfaction.

4. Customer Emergency Planning and Operations (MWCs IG, 21)

a. Overview

In an ongoing effort to mitigate wildfires and minimize impacts to our customers during Public Safety Power Shutoffs (PSPS) and All Hazard Events such as storms, wind, and heat events, the Customer Emergency Planning and Operations team collaborates with internal PG&E teams and subject matter experts to facilitate emergency response, planning, operations, external engagement, and communications.[8]

The work required to support customers during PSPS and All Hazards Events is variable and complex. A wide range of internal teams and subject matter experts, external partners, community based-organizations, and external agencies are required to develop and implement comprehensive solutions to support the needs of our customers, communities, and other partners.

PG&E's 2027 expense forecast for the Customer Emergency Planning and Operations team supports the following activities during PSPS and All Hazard Events:

- System enhancements required to eliminate or minimize ad-hoc or manual processes for notifications, as well as changes and translations to any existing customer notification scripts;
- Data Management Programs and systems provide accurate outage data tracking and findings;
- Supporting Access and Functional Needs (AFN) customers requiring resources during PSPS and All Hazards Events;
- Resiliency and backup power resources to support vulnerable customers;

---

[8] The wildfire mitigation activities are climate-informed investments that are wildfire investments. For more information on what climate resilience means at PG&E, where PG&E is in its journey to build climate resilience, and the relationship between this GRC filing and PG&E's climate resilience journey, see Exhibit (PG&E-2), Ch. 1.

- Education and outreach conducted to help prepare customers for wildfire season prior to a PSPS;
- Emergency training for internal personnel to prepare existing and incoming PG&E Emergency Operations Center staff;
- Dedicated regulatory and compliance management staff to support all mandated PSPS requirements, proceedings, and Safety and Enforcement Division assessments;
- Resources required to support customers during PSPS and All Hazard events such as storms, wind and heat events;
- Operating Community Resource Centers (CRC) during PSPS[9] and potentially All Hazard events to provide community members with a safe place to access basic resources; and,
- Partnership with California 211 Providers Network (CA 211)[10] to coordinate with customers during Wildfire Safety Outages, such as a PSPS, Enhanced Powerline Safety Setting (EPSS) outage, and/or All Hazards Emergency Events throughout PG&E's service area and connect them with local support and resources.

1) Public Safety Power Shutoff (PSPS) – Customer Programs

PSPS events are conducted according to requirements within several Commission decisions.[11] Non-compliance may result in fines and penalties through the PSPS Citation Program.[12] Each of these requirements are discussed below.

---

9 D.20-05-051, Appendix A, item (d), pp. 5-6 has required guidelines for Community Resource Centers for when a PSPS activation occurs.

10 D.21-06-034, p. A9: Each electric IOU must build partnerships with CBOs and healthcare providers, including but not limited to, those from county-level health and human services departments, public health departments, healthcare facilities, and clinics, including those serving customers in one or multiple prevalent language, to minimize the impact of PSPS events, and to improve outreach and assistance for people/communities with access and functional needs and vulnerable populations.

11 PG&E Public Safety Power Shutoffs (PSPS) are required by Resolution (Res.) ESRB-8 (July 12, 2018). The Safety and Enforcement Division (SED) monitors PG&E's compliance with *Order Instituting Rulemaking* (OIR) (December 5, 2018), R.18-12-005 and Decisions known as Phase 1 D.19-05-042, Phase 2 D.20-05-051, and Phase 3 D.21-06-034.

12 Res. WSEB-1 (Sept. 21, 2023) adopts a citation program for enforcing compliance with the Commission's Public Safety Power Shutoff (PSPS) guidelines.

a) PSPS Customer Notifications

The Commission's Phase 1 PSPS Decision (D.19-05-042) requires PG&E to provide notifications during a PSPS while adhering to specific notification and communication protocols.[13] Furthermore, PG&E must deliver notifications within specific mandated timeframes[14] to avoid citations and fines.

The Customer Emergency Planning and Operations team works on PG&E's overall PSPS notifications strategy, including message content, and managing timely in-event handling and deployment processes. Customer Emergency Planning and Operations also partners with the Digital Strategy team to ensure information consistency on PG&E's website and manages in-language compliance,[15] including American Sign Language and accessibility/usability testing of written and verbally communicated materials. Lastly, Customer Emergency Planning and Operations handles the technical aspects of in-event communications, including PSPS events, to ensure customer information is accurate and notifications are delivered within regulatory compliance windows.

b) Access and Functional Needs (AFN)

The Commission's PSPS decisions require PG&E to identify AFN[16] populations within its customer base[17] and provide assistance during a PSPS event for priority

---

[13] D.19-05-042, p. A1: develop notification and communication protocols and systems that reach customers no matter where the customer is located and deliver messaging in an understandable manner.

[14] D.21-06-034, pp. A11 to A13, Section H. Notifications.

[15] D.19-05-042, pp. A18 to A19: Communications must also be delivered in English, Spanish, Chinese (including Cantonese, Mandarin and other Chinese languages), Tagalog and Vietnamese as well as Korean and Russian where those languages are prevalent within the utilities' service territories.

[16] The term "access and functional needs populations" refers to those populations with access and functional needs as set forth in Government Code § 8593.3. Government Code § 8593.3 defines access and functional needs populations as individuals who have developmental or intellectual disabilities, physical disabilities, chronic conditions, injuries, limited English proficiency or who are non-English speaking, older adults, children, people living in institutionalized settings, or those who are low income, homeless, or transportation disadvantaged, including, but not limited to, those who are dependent on public transit or those who are pregnant.

[17] D.19-05-042, p. A12: The electric investor-owned utilities must make a diligent effort to identify access and functional needs populations within their customer base.

and in-person notifications,[18] as well as outreach resource information prior to wildfire season,[19] with the support of community-based organizations (CBO).[20]

The Access and Function Needs program works to fulfill PSPS regulatory requirements, support the demands of AFN program needs, and provide in-event support. PG&E's AFN Program engages diverse and cross-functional partners to set strategies and implement campaigns to educate and engage PG&E's communities, customers, CBO partners, and others regarding wildfire risks.

c) Critical Facilities and Infrastructure

PG&E is required to provide advanced notifications to Critical Facilities[21] and work with Critical Facility operations during a PSPS event. PG&E is also required to identify and understand their safety needs related to PSPS events. This is accomplished through ongoing outreach conducted prior to wildfire season.

Customer Emergency Planning and Operations coordinates with critical facilities, such as hospitals, telecommunication providers, and transportation agencies, among others, to further understand and more effectively plan for the impacts of wildfire and PSPS events, with a focus on how to safely operate these facilities during a wildfire or outage event. Customer Emergency Planning and Operations engages annually with Critical Facilities to validate contact information and coordinate resiliency planning efforts associated with backup generation.[22]

---

18 D.19-05-042, p. A20: The electric IOUs, in partnership with local and state public safety partners, must develop notification strategies for access and functional needs populations up to and including in-person notification.

19 PG&E 2023-2025 Wildfire Mitigation Plan, Rev, 6, (July 5, 2024), Section 8.5.1.1 Objectives, Revised Table PG&E 8-54: Community Outreach and Engagement Initiative Objectives, Objective CO-05 – Community Engagement – Outage Preparedness Campaign.

20 D.21-06-034, p. A9: Each electric IOU must build partnerships with CBOs and healthcare providers, including but not limited to, those from county-level health and human services departments, public health departments, healthcare facilities, and clinics, including those serving customers in one or multiple prevalent language, to minimize the impact of PSPS events, and to improve outreach and assistance for people/communities with access and functional needs and vulnerable populations.

21 D.19-05-042, p. A4: The term "critical facilities" and "critical infrastructure" refers to facilities and infrastructure that are essential to the public safety and that require additional assistance and advance planning to ensure resiliency during PSPS events.

22 PG&E 2023-2025 Wildfire Mitigation Plan, Rev, 6, (July 5, 2024), Section 8.5.2 Public Outreach and Education Awareness Program.

d) Pre-Season Customer Outreach Preparedness

In connection with PSPS regulatory requirements,[23] prior to peak wildfire season, PG&E designs and executes a comprehensive wildfire safety and PSPS preparedness community outreach strategy, using lessons learned and feedback received from customers and stakeholders.[24] PG&E conducts community outreach to educate agencies, customers, and property owners on aspects of our wildfire mitigation practices, such as PSPS, EPSS, community resilience, system hardening, and their role in helping to reduce wildfire risks in their communities.[25]

While PG&E's engagement for the PSPS has advanced in maturity and will remain an area of focus, other key wildfire mitigation programs are driving additional needs for engagement, including EPSS and Undergrounding. PG&E will further integrate awareness and education about the EPSS program into broader Community Wildfire Safety Program customer messaging about wildfire safety outages resulting from programs like PSPS and EPSS.

e) Integrated Multicultural Outreach

The Commission's PSPS decisions require PG&E to communicate to customers in different languages.[26],[27],[28] The Integrated Multicultural Outreach team supports

---

[23] D.21-06-034, p. A7: PG&E is required to conduct education and outreach prior to wildfire season to provide customers with resources and programs available to help them prepare for a PSPS.

[24] PG&E 2023-2025 Wildfire Mitigation Plan, Rev, 6, (July 5, 2024), Section 8.5.1.1 Objectives, Revised Table 8-54 Community Outreach and Engagement Initiative Objectives, CO-05 – Community Engagement – Outage Preparedness Campaign.

[25] PG&E 2023-2025 Wildfire Mitigation Plan, Rev. 6, (July 5, 2024), Section 8.5.1.1 Objectives, Revised Table 8-54 Community Outreach and Engagement Initiative Objectives, CO-05 – Community Engagement – Outage Preparedness Campaign.

[26] D.19-05-042, p. A1: Customers should understand the purpose of proactive de-energization, the electric investor-owned utilities' process for initiating it, how to manage safely through a de-energization event, and the impacts if deployed. To accomplish this, the electric investor-owned utilities must: communicate to customers in different languages and in a way that addresses different access and functional needs using multiple modes/channels of communication.

[27] D.20-05-051, Appendix A, item (c), p. 5: Whenever reasonably possible, communications shall be in the language preferred by the customer.

[28] D.21-06-034, p. A7, Section E, item (1): Each electric investor-owned utility must conduct PSPS education and outreach, including surveys, in "prevalent" languages, as defined in D.20-03-004, in its service territory.

the language requirements of the PSPS and Wildfire Mitigation program needs, while providing in-event support.

Since 2020, the Integrated Multicultural Communications team has conducted an annual four-phase Wildfire Safety and Preparedness Multicultural Media Engagement Campaign aimed to provide accurate, timely, and culturally appropriate information to diverse customers on wildfire safety and PSPS-related power outages. PG&E's Integrated Multicultural Communications team communicates with the media partners throughout the wildfire season to provide translated information before, during, and after PSPS. Participating media partners are required to attend a PG&E-sponsored training prior to the wildfire season each year.

f) Internal Training & Development

PG&E conducts ongoing training and development in connection with PSPS regulatory requirements[29] to prepare existing and incoming PG&E personnel to fulfill their respective roles with the Emergency Operations Center and coordinates with public safety partners before, during, and after a proactive de-energization event.

Customer Emergency Planning and Operations conducts preparation drills and tabletop exercises to train, prepare, and develop PG&E emergency personnel and continuously test PG&E's Business Continuity and Recovery plans.[30] A progressive exercise approach trains emergency personnel to test, practice, and strengthen incident preparedness and response. Our approach is described in PG&E's Multi-Year Training and Exercise Plan (MYTEP), which lays out a combination of progressive exercises and training requirements to validate our plans and operational readiness in an all-hazards environment. PG&E maintains an integrated training and exercise program for all functional units through a variety of seminar or workshop, tabletop exercises, functional exercises, or full-scale exercises. At least

---

29 D.21-06-034, p. A8: All electric investor-owned utility EOC staff must receive annual emergency management training sufficient to enable them to perform their assigned role. Emergency management expertise is necessary to communicate effectively, accurately, and consistently with public safety partners before, during, and after a proactive de-energization event.

30 PG&E 2023-2025 Wildfire Mitigation Plan, Rev. 6, (July 5, 2024), Section 8.4.5.3 Drills, Simulations, and Tabletop Exercises.

two months in advance of the start of wildfire season annually, PG&E conducts communication exercises to confirm its ability to rapidly disseminate information.[31]

g) Regulatory Management & Compliance

Customer Emergency Planning and Operations has a dedicated Strategic Analyst to manage coordinated efforts with PG&E's Compliance & Risk, Data Request Unit, and Internal Audit organizations to ensure all PSPS reports, procedures, and process documentation comply with the Commission's PSPS decisions.[32] The Strategic Analyst contributes to the development of strategic plans that meet regulatory objectives and drive performance to deliver on those plans while partnering with Legal and Regulatory Relations teams in gathering, drafting, finalizing, and providing written and oral responses and testimony in wildfire-related regulatory, legislative and other proceedings, workshops and hearings.

h) Regional Town Halls, Community Wildfire Safety Program Webinars, and External Events

PG&E hosts safety-focused community engagement events, including regional town halls and community webinars, to engage directly with customers in connection with PG&E's Wildfire Mitigation Plan commitment.[33] PG&E uses these events to convey local wildfire safety information in advance of wildfire season and present our efforts focused on the impacts that wildfire safety initiatives have on the community.

PG&E also hosts events for specific audiences, including customers with Access and Functional Needs, K-12 schools, in-language webinars, large commercial customers, and for Community Based Organizations.

i) Public Safety Power Shutoff Surveys

PG&E conducts a pre-wildfire season survey and a post-wildfire season survey of the public to evaluate the effectiveness of our education and outreach efforts prior

---

31 D.19-05-042, p. A11: Requires PG&E to conduct communication exercises prior to wildfire season to confirm their ability to rapidly disseminate information.

32 PG&E Public Safety Power Shutoffs (PSPS) are required by Res. ESRB-8 to mitigate catastrophic wildfires. The Safety and Enforcement Division (SED) monitors PG&E's compliance with Order Instituting Rulemaking (OIR) (Issued Dec. 19, 2018), R.18-12-005 and Decisions such as Phase 1 (D.19-05-042), Phase 2 (D.20-05-051), and Phase 3 (D.21-06-034).

33 PG&E 2023-2025 Wildfire Mitigation Plan, Rev. 6, (July 5, 2024), Section 8.5.1.1 Objectives, Revised Table 8-53 Community Outreach and Engagement Initiative Objectives, CO-01 – Community Engagement – Meetings.

to, during, and immediately after, peak PSPS and wildfire seasons[34] as required by PSPS regulatory requirements.[35]

j) All Hazards Events

CPUC General Order 166[36] requires jurisdictional electric utilities to be prepared for emergencies and disasters resulting in electric system failures, major outages, or hazards posed by damage to electric distribution facilities and to support our customers during unplanned outages attributable to inclement weather.

Upon the issuance of an emergency proclamation, PG&E partners with local jurisdictions to support our customers during these unplanned outages by mobilizing supporting resources such as sending out a Customer Support Unit van, providing backup batteries, and grab-and-go supply bags. When an emergency proclamation has not been declared, PG&E often stands in and supports customers during major outages.

2) Community Resource Centers

Community Resource Centers (CRC) are part of PG&E's community assistance program within its Wildfire Mitigation Plan[37] and are required pursuant to PSPS Phase 2[38] and Phase 3 decisions.[39] In PG&E's 2023 GRC, the forecast for this work was located in Exhibit (PG&E-4) Electric Distribution, Chapter 4.2, PSPS Operations as the CRC Preparedness Program under Wildfire Mitigation initiative WLDFR-M006.

---

34 PG&E 2023-2025 Wildfire Mitigation Plan, Rev. 6, (July 5, 2024), Section 8.5.1.2 Community Outreach and Engagement.

35 D.21-06-034, p. A7, Section E., requires PG&E to conduct a minimum of two PSPS education and outreach surveys to all customers within a calendar year, to evaluate whether the education and outreach is effectively helping communities and residents before, during, and after a PSPS event to plan for alternatives electricity arrangements and/or avoid the impacts of PSPS events.

36 CPUC General Order 166, p. 1. Standards to ensure that jurisdictional electric utilities are prepared for emergencies and disasters in order to minimize damage and inconveniences to the public that may occur as a result of electric system failures, major outages, or hazards posed by damage to the electric distribution facilities.

37 PG&E 2023-2025 Wildfire Mitigation Plan, Rev. 6, (July 5, 2024), Section 8.4.6 Customer Support in Wildfire and PSPS Emergencies.

38 D.20-05-051, Appendix A, item (d), pp. 5-6 has required guidelines for Community Resource Centers (CRC) for when a PSPS activation occurs.

39 D.21-06-034, pp. A1 to A3, Section A, items (1-7), additional required guidelines for Community Resource Centers (CRC) for when a PSPS activation occurs.

PG&E provides CRCs in coordination with local government and agencies that include, at a minimum, device charging stations capable of powering medical devices, cellular network services, bottled water, snacks, seating, blankets, ice, PSPS information representatives, and Americans with Disabilities Act (ADA) compliant restrooms. To support customers who choose not to stay at a CRC, PG&E provides grab and go bags that include a portable battery charger, bottled water, snacks, and a blanket. Furthermore, PG&E partners with Community Based Organizations (CBO) to provide in-event support services such as transportation to a CRC or a nearby location with power, hotel accommodations, a backup battery, and food replacement resources to our Access and Functional Needs (AFN)[40] customers.

The CRC program includes a small project management team that manages the construction at all indoor sites to bring the site up to ADA compliance, electrical construction to make necessary upgrades for placement of temporary generating units, CRC material procurement, and key third-party vendor contracts (including contracts with emergency service providers and external customer staffing for the sites).

To prepare indoor CRC sites in advance of PSPS season, as noted above, all indoor CRC sites are made ADA compliant and undergo electrical upgrades if needed. Any building improvements required to make the facility compliant, such as repairing cracks in the path of travel or re-striping ADA parking, are included. Indoor CRC sites are also equipped with an automatic transfer switch so that the PG&E-provided or site-owned generator will automatically activate during a PSPS outage. By the end of 2024, PG&E had 118 event-ready indoor sites where all the aforementioned work was complete. In the forecast, PG&E includes site turnover and additional site requests from counties and tribal governments of approximately fifteen percent per year.

---

40 The term “access and functional needs populations” refers to those populations with access and functional needs as set forth in Government Code § 8593.3. Government Code § 8593.3 list ‘access and functional needs populations as follows: …the ‘access and functional needs population’ consists of individuals who have developmental or intellectual disabilities, physical disabilities, chronic conditions, injuries, limited English proficiency or who are non-English speaking, older adults, children, people living in institutionalized settings, or those who are low income, homeless, or transportation disadvantaged, including, but not limited to, those who are dependent on public transit or those who are pregnant.

The CRC Preparedness Program includes budget for key third-party providers to prepare in advance for PSPS events. These include a professional staffing agency that recruits and trains approximately 650 Customer Service Leads and Customer Service Support staff in how to operate CRCs during PSPS events. The forecast also includes the retainer for an emergency service provider who sets up the CRC sites during activations. The actual costs of staff time during events are not included in this forecast but are included in PSPS event forecasts. If a PSPS is initiated, the costs of the emergency service providers are charged to in-event PSPS orders.

3) California 211 Providers Network

PG&E partners with California 211 Providers Network (211 California), a Community Based Organization (CBO) to coordinate with customers located in HFRA that may be impacted by Wildfire Safety Outages, which includes a PSPS or Enhanced Powerline Safety Setting (EPSS) outage and/or All Hazards Emergency Events throughout PG&E's service area. PG&E will work with 211 California to provide households with at least one Access and Functional Needs member with a single source of information and resources, a key component of meeting our commitment to work with CBOs in targeted communities to increase their capacity to serve AFN communities, such as medically sensitive customers, low-income, limited-English speaking and tribal customers, as outlined in PG&E's 2023 Wildfire Mitigation Plan.

211 California was previously recovered in the Wildfire Gas and Safety Costs filed in June 2023. Please refer to Section D.3. As part of our commitment and regulatory requirement[41] to support AFN customers during a PSPS, PG&E partners with 211 California, a CBO, to connect AFN customers to programs and services by utilizing their network of 11,000 CBOs and government agencies across PG&E's service area.

211 California is a 24/7 connection point for AFN households before, during, and after Wildfire Safety Outages and All Hazards Emergency Events. Leveraging existing strategies and efficiencies developed, the 211 California will use PG&E

---

41 D.21-06-034, p. A9: Each electric IOU must build partnerships with CBOs and healthcare providers, including but not limited to, those from county-level health and human services departments, public health departments, healthcare facilities, and clinics, including those serving customers in one or multiple prevalent language, to minimize the impact of PSPS events, and to improve outreach and assistance for people/communities with access and functional needs and vulnerable populations.

funding to support the successful expansion of its services to AFN households for Wildfire Safety Outages and/or All Hazards Emergency Events related needs. Additionally, 211 California will connect the AFN community with resources to create a resilience plan before the onset of Wildfire Safety Outage/All Hazards Emergency Events each year to help reduce the number of emergency calls received by PG&E and Emergency Service Providers during a Wildfire Safety Outage/All Hazards Emergency Events.

TABLE 2-4
CUSTOMER AND EMERGENCY PLANNING AND OPERATIONS
SUMMARY OF EXPENSE
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted 2020	2021	2022	2023	2024	Forecast 2025	2026	2027
1	IG	Manage Var Bal Acct Processes	$31,450	$26,691	$21,643	$16,834	$14,993	$18,815	$19,341	$20,011
2	DK	Manage Cust Inquiries	450	421	469	432	252	450	450	450
3		Total	$31,900	$27,112	$22,112	$17,266	$15,245	$19,265	$19,791	$20,461

TABLE 2-5
CUSTOMER AND EMERGENCY PLANNING AND OPERATIONS
SUMMARY OF CAPITAL
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted 2020	2021	2022	2023	2024	Forecast 2025	2026	2027	2028	2029	2030
1	21	Misc Capital	$1,021	$146	$(16)	$5	$3	$114	$114	$121	$124	$127	$130
2		Total	$1,021	$146	$(16)	$5	$3	$114	$114	$121	$124	$127	$130

b. Costs and Forecast

The work described in this section supports PG&E customers impacted by PSPS and All Hazards events. PG&E's 2027 expense forecast is $5.0 million higher than 2024 recorded costs.[42]

- PSPS Customer Programs is $3.4 million higher than 2024 recorded costs due to expected adjustments necessary for substantial customer notification enhancements (including language translation)—as defined in the phased decisions in R.18-12-005—to ensure compliant notification communication

[42] Exhibit (PG&E-6) WP 2-35.

protocol and PSPS program requirements, additional customer education and outreach based on necessary program changes, and an increase in headcounts to support Access and Functional Needs program development.

Cost increases result from PSPS notification script changes for all notification types and translation into 15 non-English languages to maintain program compliance will be needed, as well as costs to support customer contact center operations in providing resource support to customers inquiring about wildfire mitigation and preparation programs and updates to customer contact information. Finally, increased costs are attributable to support outreach to unassigned critical facility/infrastructure business accounts, as well as required outreach to additional critical facilities resulting from changes to High Fire Risk Areas will be needed.[43]

- Community Resource Center activities are $1.5 million higher than 2024 recorded costs due to ongoing construction costs to make indoor Community Resource Center sites ADA compliant and to ensure all electrical upgrades are made for the installation of temporary generation during the PSPS/wildfire season. In addition, costs associated with the replenishment of supplies and resources provided at the CRC locations for customers are also built into the forecast. The forecast is aligned with contract cost escalation for our staffing vendor and emergency service provider. Finally, increase costs to construct (electrical and ADA upgrades) additional CRCs based on county and Tribal government feedback to ensure coverage across counties in High Fire Risk Areas, as well as increased cost-related to maintenance and management of existing CRC sites in the portfolio will be needed.[44]
- California 211 Providers Network is $0.1 million higher than 2024 recorded costs due to contract escalations, as well as increase costs to correspond with contract cost increase for connecting AFN customers with Community Based Organizations and government agencies across PG&E's service area during a PSPS or All Hazard events.[45]
- PG&E's capital expense for MWC 21 is related to Community Resource Centers (CRCs). PG&E's capital forecast for CRCs is $0.1 million in 2025, $0.1 million in

---

43 Exhibit (PG&E-6) WP 2-37, line 1.

44 Exhibit (PG&E-6) WP 2-37, line 2.

45 Exhibit (PG&E-6) WP 2-37, line 3.

2026, $0.1 million in 2027 and 2028, $0.1 million in 2029, and $0.1 million in 2030.

5. Regional Service Model (RSM) (MWC JV, EZ, AB, 2F)

a. Overview

Since 2021, PG&E has utilized a Regional Service Model to bring us closer to our customers and the communities we serve. We have empowered regional leadership teams to understand and quickly act on the needs and priorities of their local communities. As a part of the communities, our teams live and work in the regions they represent. We have established five regions, each led by a Regional Vice President.[46] The regional teams consist of the five Regional Vice Presidents and their respective regional teams, which include Regional Senior Managers, Division Operations Specialists, internal and external Principal Operations Specialists, and Executive Assistants. The regional teams are well positioned to identify, prioritize, and address local concerns by collaborating internally with regional safety, operations, planning, engineering, and customer leaders, and engaging externally with key customers, business organizations, and community groups when local challenges arise.

The regional teams are embedded in the regions and have a deep knowledge of the community priorities. The regional teams share direct accountability for their region's customer experience, operational performance, and safety,[47] and lead cross-functional efforts to improve performance at the local level by supporting timely and tactical resolution of challenges raised by communities and local PG&E teams.[48]

The Regional Vice Presidents provide leadership and accountability for regional business performance, resolving local issues quickly, managing teams of regional support staff, and engaging with key customers, business organizations, and community groups. By facilitating cross-functional collaboration and regional

---

46 The five regions include North Coast, North Valley and Sierra, Bay Area, South Bay and Central Coast, and Central Valley. The five regions are organized around division boundaries, which have been aligned to the extent possible with County boundaries. Refer to Exhibit (PG&E-01) Ch. 1 for the divisions that are included in each region.

47 Refer to Exhibit (PG&E-7), Ch. 1 Enterprise Health and Safety Section D1 a regarding the partnership between the Regional Vice Presidents and Regionalized Field Safety Leadership.

48 See Exhibit (PG&E-6) Ch. 2, WP 2-38.

alignment, the Regional Vice Presidents drive continuous improvement, maximizing the value of ratepayer dollars. They connect functional areas within the Company to ensure we deliver results for our customers and are responsible internally for activating coworker culture to ensure strong and sustainable operational performance across our regions. In addition, the Regional Vice Presidents represent the company both internally and externally, to improve customer satisfaction and trust. Regional Vice Presidents work closely with all PG&E functions to ensure PG&E is showing up to support local engagements and advocate on behalf of customers to highlight areas where PG&E can improve customer experience.[49] With a seat at the leadership table, the Regional Vice Presidents function as the voice of the customers and communities PG&E serves.

The Regional Service Model Program Management Office (PMO) supports the regional teams by leading enterprise-wide change initiatives and ensuring central alignment for the model. For instance, the PMO is developing processes to assist regional teams in advocating for local reliability issues that may otherwise be overlooked or unresolved within a centralized prioritization model. This could involve highlighting a specific area with rising reliability concerns that might not be detected at the enterprise level or identifying quick and cost-effective solutions discovered by local leaders but lacking the necessary funding.

Members of the PMO work closely with the regional and cross functional teams to develop local metrics and associated regional targets. This provides local teams with daily, weekly, monthly, and yearly views on the performance in their region to drive local awareness and to address performance gaps. The PMO also collaborates with Regional Vice Presidents and their teams to improve regional operating reviews by supporting and sharing standards and best practices across the local teams.

The PMO will take on a larger role within the Local Customer Engagement (LCE) organization starting in 2027. The PMO will become the new LCE Business Operations team to provide support to the LCE Leadership office and Customer Engagement Team in addition to continuing to support and strengthen the regional service model and regional teams.

The LCE Business Operations team will provide support to these teams regarding data requirements, lean operating standards, best practices and LCE-wide

---

49 See Exhibit (PG&E-6) Ch. 2, WP 2-39 to WP 2-41.

initiatives such as our long-term planning and strategy and alignment of 10-year plans within the organization. The LCE Business Operations team will also provide support regarding financial planning, regulatory requests and leadership support including facilitating the annual goal setting and development plan processes for the approximately 300-person organization.

As the PMO matures, it will support the larger LCE organization with no planned significant changes to funding or headcount.

The PMO and the regional teams strengthen PG&E's hometown presence, improve local safety and operational performance and enable PG&E to deliver for our customers. The regional teams have developed the capabilities to engage with our customers and communities at the local level, building and maintaining important relationships and improving overall service.

Since the inception of the Regional Service Model, customer satisfaction as measured by the Customer Transaction Surveys (CTS) has shown continual improvement. Strengthened relationships with key customers, business organizations, local governments, and other community groups has created two-way dialogue with these stakeholder groups. Feedback shared through this channel has resulted in improved processes and procedures.

TABLE 2-6
REGIONAL SERVICE MODEL
SUMMARY OF EXPENSE
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted 2020	2021	2022	2023	2024	Forecast 2025	2026	2027
1	AB	Misc Expense	–	$1,331	$1,509	$1,141	$1,919	–	–	–
2	EZ	Manage Var Cust Care Processes	556	3,259	8,501	9,626	9,567	10,444	10,255	12,246
3	JV	Maintain IT Apps and Infra	–	20	319	771	689	732	864	–
4		Total	$556	$4,610	$10,329	$11,538	$12,175	$11,176	$11,119	$12,246

TABLE 2-7
REGIONAL SERVICE MODEL
SUMMARY OF CAPITAL
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast					
			2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
1	2F	Build IT Apps	–	–	$4,105	$7,569	$7,058	$3,187	$3,187	–	–	–	–
2		Total	–	–	$4,105	$7,569	$7,058	$3,187	$3,187	–	–	–	–

b. Costs and Forecast

The expense increase is primarily due to the inclusion of Regional Service Model PMO and regional support staff costs in the 2027 forecast which were not included in the 2023 GRC filing. PG&E will be seeking cost recovery of the PMO costs recorded through December 31, 2026, to the Regional Plan Memorandum Accounts (RPMAs).

6. Transportation and Building Electrification (MWC GM)

a. Overview

PG&E aims to decarbonize the energy system while driving downward pressure on electric rates[50] by advancing transportation electrification (TE) and building electrification (BE). By effectively integrating this new load into the grid, PG&E can also enhance grid reliability and resilience and reduce greenhouse gas emissions. To enable these benefits, and in light of the state's goal of having five million electric vehicles (EV) on the road by 2030,[51] as well as broader state electrification and decarbonization policies and goals,[52] PG&E is working to support the operation of three million EVs in its service area, while realizing 550 MW of flexible EV load in the

---

50 See discussion below, in addition to Exhibit (PG&E-4), Ch. 10 for additional discussion of how PG&E is leveraging electrification to drive downward rate pressure.

51 Governor's Executive Order No. B-48-18 (Jan. 26, 2018), available at: <https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/39-B-48-18.pdf> (accessed April 17, 2025).

52 Please see Exhibit (PG&E-4), Ch. 10 Section B for further discussion.

process across light-, medium- and heavy-duty vehicles by 2030.[53] Currently, there are over 712,000 EVs in PG&E's service area.[54]

PG&E's forecast includes costs for activities focused on simplifying and improving the customer experience for both TE and BE needed to meet the state's electrification goals. While PG&E is not proposing any new infrastructure, incentives, vehicle-grid integration (VGI) or load management programs, these costs support PG&E's enabling efforts to increase TE and BE adoption by improving the customer experience for both TE and BE, and to complement, fill, further and enable the Company's evolving portfolio of existing TE and BE customer programs, with a focus on making these activities a core part of our utility and customer operations. As described further below, this includes categories of expense costs covering: (i) specific categories of labor for TE and BE, (ii) activities to improve customer experience for TE and BE, (iii) initiatives related to the detection of EVs, disaggregation of EV load, and EV rates marketing, and (iv) operations and maintenance (O&M) costs for PG&E-operated charging stations that were deployed via legacy programs and Commission directives.[55]

These efforts will help PG&E streamline the customer electrification experience for both TE and BE customers. In addition, these efforts enable PG&E to better manage customer utilization reducing the impact and cost associated with grid infrastructure by enrolling customers in suitable rates, for enrollment in load management solutions such as VGI programs and demand flexible home electrification solutions. This includes modernizing digital tools, improving processes, training and funding for the call center, and a targeted marketing campaign designed to help customers connect to PG&E's grid. Importantly, this forecast reflects an effort to create efficiencies and avoid silos in PG&E's approach to advancing TE and BE. Much of PG&E's forecast work is scoped to support both TE and BE customers, who in many cases are the same customer, or are engaging with PG&E in a similar fashion.

---

53 PG&E 2024 Corporate Sustainability Report, p. 94, available at: <https://www.pgecorp.com/assets/pgecorp/csr/csr_2024/assets/pge-csr-2024.pdf> (accessed April 17, 2025).

54 Electric Power Research Institute, Inc. (EPRI) Q4 2024.

55 Costs associated with building electrification labor, customer experience initiatives and EV detection are incremental to the 2023 GRC

Accelerating TE and BE and maximizing utilization of the grid to efficiently support that adoption by leveraging VGI can result in downward rate pressure, supporting affordability goals by reducing bills for all customers. This conclusion is supported by the California Legislature's express findings in the Powering Up Californian's Act that "[e]lectrifying transportation and buildings may put downward pressure on rates by spreading fixed costs over more kilowatt hours of usage."[56] A recent Synapse Energy Economics study estimated that revenue from EV growth has outpaced the cost to serve EVs and in turn is already applying downward pressure on rates in California for both EV and non-EV customers.[57] Managing EV load dynamically with VGI technology as it scales in the future could potentially render additional value.

1) Streamlining the Customer Experience to Drive TE and BE Adoption and Create Downward Rate Pressure

A simplified and improved customer experience during the customer exploration phase is essential to driving affordable electrification.[58] Today, Californians who are interested in adopting electric technologies (e.g., EVs, heat pumps, etc.) too often face hurdles in the electrification process due to either a lack of information or misinformation about the benefits of electrification. A study by E-Source of potential EV adopters identified that people believe that charging is complex, difficult, or

---

56 Pub. Util. Code §§ 932(a)(7)-(8).

57 As of May 2024, EV drivers in California have contributed $2.2 billion more to utilities than their associated cost to the grid over the past 11 years, driving electricity rates down for all customers. See Synapse Energy Study, available at: <>(accessed May 2, 2025). See Synapse Energy Study, available at: <https://www.synapse-energy.com/sites/default/files/Electric%20Vehicles%20Are%20Driving%20Rates%20Down%20for%20All%20Customer%20California%20May%202024%2024-023.pdf>(accessed May 2, 2025).

58 In 2024, PG&E conducted 30 interviews with 10 internal teams and three automobile original equipment manufacturers to better understand the existing EV customer journey, pain points, and opportunities to improve. PG&E built off this research in late 2024 and conducted internal journey mapping workshops incorporating the TE and BE experiences together to understand the current state and barriers to an electrified future. This research found that insufficient education and awareness, a complex service connection process, and lack of customer support were key pain points for both TE and BE customers.

involves a technology process (charging station) they don't understand.[59] As the market begins to support early majority adopters who generally require more assurance before adopting new technologies than early adopters, it is critical to address the misperceptions and inaccuracies around every element of the charging ecosystem—from charging at home and at public stations to battery range and more.

Yet, a lack of information and misinformation are not the only barriers. A study by Lawrence Berkeley Laboratories found that approximately 50 percent of customers living in single family homes in California have a service panel rated less than 200 Amps.[60] Adding an EV charger or space conditioning heat pump may trigger the need for service panel upsizing. These upgrades are a substantial barrier for customer electrification, typically costing customers between $2,000 to $4,500 to upgrade the electrical service panel alone. Including potential service upgrades and other costs, customer out-of-pocket costs may reach $30,000.[61] The additional cost and hassle required are major barriers for customers trying to electrify.

The following initiatives reflect PG&E's evolving and maturing approach of supporting customer electrification through increasing access to electrification information and simplifying and improving the energization process:

- The Electrification Advisor Tool will provide comprehensive support for customers seeking information and resources for enabling home EV charging

---

59 The Colorado Energy Office, Regional Air Quality Council and Colorado Department of Transportation released the EV education and Awareness Roadmap, "Colorado Releases Electric Vehicle Education and Awareness Roadmap" (August 4, 2020), available at: <https://energyoffice.colorado.gov/press-releases/colorado-releases-electric-vehicle-education-and-awareness-roadmap> (accessed April 17, 2025). This Roadmap includes findings from E-Source that potential EV adopters believe that charging is complex, difficult, or involves a technology process (charging station) they don't understand.

60 Lawrence Berkeley Lab, "Electrical Service Panel Capacity in California Households with Insights for Equitable Building Electrification" (August 2024), p. 14, available at: <https://homes.lbl.gov/sites/default/files/2024-08/aceee_2024_panels_in_ca.pdf> (accessed April 17, 2025).

61 NV5, "Service Upgrades for Electrification Retrofits Study Final Report," (May 27, 2022), available at: <https://pda.energydataweb.com/api/view/2635/Service%20Upgrades%20for%20Electrification%20Retrofits%20Study%20FINAL.pdf>(accessed April 17, 2025). This statistic does not include utility-side upgrades charged to the customer, as per D.21-12-033, PG&E must cover utility-side costs in excess of the Rule 16 allowance related to EV charging upgrades at residential properties.

and transitioning to an electrified home. This tool is being rolled out in phases, with Phase 1 planned to be built before 2027, and Phase 2 to be built starting in 2027. Phase 1 will deliver tailored electrification recommendations based on customer inputs and existing PG&E resources which will range from information on EV charger installation and load management solutions, among other recommendations. Phase 2 will leverage technology to automatically analyze panel information, complete load evaluations and provide smart, fully customized recommendations on incentives, electrification rates, and next steps (e.g., enrolling in a load management program and avoiding a panel upgrade) to support a customer's transition to TE and/or BE.

- PGE.com Web Enhancements will provide information that is tailored to the diverse electrification scenarios throughout PG&E's service territory and customer base. Enhancements may incorporate the use of interactive demos, data-driven insights, and/or artificial intelligence (AI) tools to help answer specific customer questions rather than relying on static information to make decisions. Allowing customers to see themselves reflected in the information and examples provided will also facilitate electrification across a diverse audience. PG&E intends this work to enhance the accessibility and transparency of electrification programs and resources and incentives, as well as build customer satisfaction and engagement by providing a modern, seamless experience. In addition, providing more-self-service options has the potential to drive down costs to the call center as a result of avoided calls from customers that are able to address concerns via online resources.
- EV Savings & Fleet Calculators are existing digital tools that empower customers and fleet operators to make decisions to enable TE. Features include comprehensive vehicle catalogues, rate calculators, total cost of ownership calculators, and personalized incentive and rebate information, including information on applicable PG&E programs and resources. Easy-to-use calculators simplify complex comparisons, enabling customers to understand costs and benefits and make informed decisions. The EV Savings Calculator has been a trusted and popular source of information for customers looking to adopt an EV, serving approximately 1.6 million unique visitors since its launch in 2019. The EV Fleet Calculator has helped nearly 30,000 unique users explore the feasibility of transitioning their fleets to EVs. Maintaining the accuracy of the

information embedded within these tools is critical to meeting customer needs. For example, updating existing modules with information about the evolving functionality of vehicles and chargers, load management options, and linking to other PG&E resources like capacity maps and service planning resources contribute to a comprehensive and integrated set of resources customers can use to make informed decisions on electrification.

- The Contact Center Customer Service Representative (CSR) Electrification Support Initiative provides training for PG&E CSRs to equip them with the knowledge needed to address electrification-related inquiries as well as funding to support calls related to customer electrification. While many customers may prefer self-service options provided via the web offerings described above, there are customers who will still prefer speaking with a CSR. As a result, it is important that CSRs are empowered to provide accurate, helpful, and timely information for customers. PG&E will provide up-to-date training materials so that CSRs can refer customers to programs or processes to expedite the connection of an EV charger or a home electrification upgrade. For example, they could include information on available incentives and/or technology that can reduce the cost or mitigate the need for panel upsizing.
- The "Connect to PG&E" Initiative is designed to guide and provide resources that simplify and enhance understanding of the electrification journey, which accelerates interested customers' decision to electrify. This initiative will provide reliable information early in customers' decision-making process on the full range of electrification resources, incentives, and solutions to connect to PG&E's grid. Without guidance on how to navigate the installation of a charging station or solutions to mitigate a panel upgrade, for example, customers may encounter delays, incur high costs, and/or abandon their decision to electrify altogether.

This initiative will help customers understand that contacting PG&E early in the process of navigating EV adoption and/or a BE project can help them reduce costs (e.g., via vehicle incentives like PG&E's Pre-owned EV Rebate Program and equivalent BE rebates) and ease the process of energization (e.g., installing a charging station) through the type of information described above. Regardless of how a customer prefers to contact and interact with PG&E, this initiative will help guide customers to the resources they need to move through the electrification journey.

By leveraging learnings from Sacramento Municipal Utility District's (SMUD) proactive EV marketing campaign, this initiative is designed to achieve meaningful engagement with a range of available resources, increased program awareness to make adopting new electric technologies easier and more affordable. SMUD's campaign resulted in customers engaging with their call center representatives on rebates, rates, and charging-related topics including panel upgrades, circuit sharing and load management devices, and a 284 percent increase in traffic to their Drive Electric webpage.

2) Leveraging Flexible Load to Drive Increased Value

Identifying EV customers and encouraging them to provide flexibility in charging is foundational to maximizing EV value to all PG&E customers. PG&E's forecast includes two critical activities to accelerate the adoption of grid-beneficial EV charging and increase the value of customer electrification.

- <u>EV Data Detection</u>

As EV adoption increases rapidly in PG&E's territory, it is increasingly important to understand which customers will acquire them, where the load is coming on to the system, and the magnitude of the load to anticipate. In 2024, PG&E used an external firm to do machine learning to conduct EV detection and EV load disaggregation to identify these customers and understand their demand for electricity. In 2025 and 2026, PG&E will be shifting away from doing this work externally and will build internal PG&E capabilities instead. Critically, the new PG&E models will generate data that is linked to specific PG&E service accounts; this level of specificity is important for grid planning, program development, and marketing, and without this effort data at this granularity is unavailable.

With better data on customers' EV adoption and charging behaviors, PG&E can improve its incentives, marketing, rates and programs to encourage charging when the grid is unconstrained, and electricity is cleaner and cheaper. EV detection data also enables an understanding of where electric vehicle loads overlap with constrained transformers, enabling PG&E to bundle work and reduce repetitive truck rolls to replace failed transformers and thereby create additional ratepayer benefit via efficiencies. The data will enable the efficient design of vehicle-grid integration programs so customers can use their vehicles as backup power and support the grid at times of constraint.

PG&E's GRC forecast will build on the initial development work done in 2025 and 2026. The forecast funds will support model maintenance, the environment to run code, and model enhancements, including: (1) Amazon Web Services (AWS) environment in which to run the machine learning code, (2) labor costs for IT support and data scientists to run and maintain the machine learning code and, (3) enhancements to the code to build out critical features such as supporting Level 1 electric vehicle charging; detecting other appliances like heat pumps or electric stoves; and detecting charging at homes that also have solar panels installed.

- EV Rates Marketing

PG&E has over 712,000 EVs that operate across the service territory, and PG&E estimates that only approximately 20 percent of these EV drivers enroll in EV rates.[62] EV rates offer customers the opportunity to charge in a more cost-effective manner by encouraging charging during times when the grid is less constrained (for example, off-peak windows from midnight to 3 pm).

Marketing, education, and outreach (ME&O) efforts are necessary to drive awareness and education of PG&E's EV rate options to help increase customer enrollment in EV rates, as EV adoption accelerates. Optimizing EV charging through PG&E rates may generate savings for the customer while also encouraging charging at times when the grid has greatest capacity, driving cost savings more broadly for all PG&E customers. In 2024 alone, PG&E's EV rate (EV-2A) reflected an avoided cost of approximately $2.3 million from EV customers shifting usage to off-peak periods.[63]

ME&O plans focus on educating and engaging customers about the affordability benefits of enrolling on an EV rate. To accomplish this, the outreach plans will utilize a combination of broad marketing to large groups of customers, marketing through third-party partners such as dealerships, and targeted communications that are sent directly to customers. The broad outreach may include raising awareness about PG&E's EV rates through ads in public spaces that are followed up with targeted digital display ads. Direct to customer outreach may include emails to educate customers and highlight their potential savings. As an example, in 2024 PG&E

---

62 Approximately 135,000 PG&E customers as of the end of 2024.

63 Based on results from the 2024 Avoided Cost Calculator approved by the California Public Utilities Commission and the 2024 Load Impact Evaluation of PG&E Company's Residential Time-of-Use Rates report.

conducted broad outreach by providing information about PG&E's EV rates using ads displayed on Volta charging stations across PG&E's service area, special event venues, and via radio. PG&E followed this effort with digital ads to customers utilizing social media and Google Ads to increase awareness. Finally, PG&E conducted direct to customer outreach through email campaigns, informing EV drivers of how much they could save by switching to an EV rate.[64]

3) O&M of PG&E-Operated Charging Stations

Per Commission Decisions as discussed below, PG&E must continue to maintain the network of EV charging stations installed and operated by PG&E and obtain cost recovery for doing so in future GRCs. Public charger reliability continues to be a challenge as the EV charging market grows, having a negative impact on consumer confidence. For example, a broad J.D. Power study of EV owner satisfaction with public charging found that that one out of every five public charging attempts failed, and of those who didn't charge, 72 percent indicated that it was due to the station malfunctioning or being out of service.[65] The network of stations deployed through PG&E's Commission-approved programs provide an important charging resource for communities and areas that historically lack access to EVs, at multi-unit dwellings, schools, parks and workplaces located in disadvantaged communities. Thus, it is important that these stations continue to operate so these customers that depend on these stations have a reliable place to charge their cars.

PG&E's EV charging station O&M program supports the labor, parts and oversight necessary to manage EV charging infrastructure owned and/or maintained by PG&E that were installed under the following programs: EV Charge Network

---

64 For example, that in July-September of 2024 the EV2A off-peak rate could save customers approximately 35 percent on the equivalent of a gallon of gasoline.

65 J.D. Power Press Release, "Growing Electric Vehicle Market Threatens to Short-Circuit Public Charging Experience, J.D. Power Finds" (August 17, 2022), available at: https://www.jdpower.com/business/press-releases/2022-us-electric-vehicle-experience-evx-public-charging-study> (accessed April 17, 2025).

(EVCN), EV Schools, and EV Parks. The EVCN,[66] EV Schools and EV Parks[67] program decisions directed PG&E to obtain cost recovery for O&M expenses through future GRC filings. Due to the direction given under the decisions, binding contracts were signed with customers prior to infrastructure being built, obligating PG&E to operate and maintain the chargers for the life of the contracts, in most cases, for 10 years. Between the three programs, there will be an average of 1,630 ports in our O&M portfolio through these signed contracts from 2027-2030, with the peak of over 2000 charging stations in 2027 reducing annually as contracts for O&M support reach end of life. PG&E's forecast here does not include O&M for EV chargers that serve the PG&E fleet and PG&E employees through the Internal Fleet Electrification and Employee Vehicle Infrastructure Program which are addressed in Exhibit (PG&E-7), Chapter 2, Transportation and Aviation Services.

PG&E implements a hybrid approach for charging stations O&M, in which the expertise of PG&E employees is leveraged in combination with flexible contracted support to address both routine maintenance and specialized repair needs. This approach provides the agility needed to manage the complexity of multiple charger types and configurations, while maintaining control over critical infrastructure. This is the most efficient and economical model to operate and maintain our charging stations across our large geographic territory, as compared to a single hub model.

---

66 PG&E's initial application also proposed that starting with PG&E's 2020 GRC, "PG&E would request that ongoing O&M costs relating to EV capital infrastructure installed or forecast to be installed prior to 2020 be recovered in the 2020 GRC authorized electric distribution revenue requirements." D.16-12-065, p. 63.

67 D.19-11-017, p. 78, OP 5, "Prior to implementation, Pacific Gas and Electric Company shall file a Tier 2 [AL] with the Commission's Energy Division to establish two one-way balancing subaccounts to record the authorized revenue requirement and incremental implementation costs associated with the electric vehicle (EV) Charge Schools and EV Charge Parks pilots until both pilots are fully implemented and the remaining and ongoing costs can be submitted as part of the base margin in revenue requirement in a future General Rate Case, which will be recovered from electric customers through distribution rates."

TABLE 2-8
TRANSPORTATION AND BUILDING ELECTRIFICATION
SUMMARY OF EXPENSE
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	GM	Manage Energy Efficiency Non-BA	$1,570	$1,721	$1,601	$2,378	$1,738	$2,390	$1,527	$9,824
2	Total		$1,570	$1,721	$1,601	$2,378	$1,738	$2,390	$1,527	$9,824

b. Costs and Forecast

Customer Experience

PG&E's forecast for customer experience-focused initiatives is based on anticipated resource needs and insights from our experienced teams to ensure accuracy and alignment with program goals. PG&E's Electrification Advisor Tool, PGE.com Web Enhancements and Contact Center CSR Electrification Support Initiative have not been included in previous GRCs, reflecting PG&E's evolving focus on enhancing the customer experience and supporting TE and BE. As EV adoption continues to accelerate and BE ramps up, our request is strategically aligned with projected growth from 2027 to 2030, supported by forecasts that reflect market trends, customer demand, and our comprehensive strategy for scaling electric vehicle infrastructure and supporting growing customer BE.

- The Electrification Advisor Tool forecast was developed by evaluating similar technological implementations, supported by competitive bids to ensure the best options for enhancing our services. The resources required to develop this tool require integration with PG&E's Customer Application portal and data exchange, including custom development work and testing. Accordingly, PG&E's forecast includes allocations towards a potential licensing fee, the APIs, and the management and ongoing support of the solution. If customers who leverage this tool are able to mitigate a panel upgrade, PG&E estimates that there may be an average customer avoided costs of $6,155 per customer.[68]
- The PGE.com Web Enhancements forecast is based on comparable projects and historical data to ensure accurate and informed projections. The 2027 forecast includes the costs identifying product improvement requirements,

[68] See Exhibit (PG&E-6) Ch. 9 Section 3 Customer Electrification, c. Cost and Benefits.

customer testing, managing stakeholder and development milestones and reviewing product deliverables.

- The EV Savings and Fleet Calculators budget forecast is based on historical cost data for O&M with an escalation of five percent per year.
- To enable the Contact Center Customer Service Representative Electrification Support initiative, PG&E based cost estimates on key operational metrics, including average call volume, average handle time, and total handle time. We also factored in the labor costs for CSRs and associated Contact Center training requirements to ensure budget forecasts are aligned with customer resource needs.
- The "Connect to PG&E" initiative forecast includes content development that will run across multiple media channels, informed by historical program performance and recently completed campaigns, with an assumed 20 percent cost increase in media rates compared to 2024.

EV Data Detection

To forecast expenditures on EV detection and load disaggregation, PG&E first estimated expenses for 2024 conditions and then extrapolated those expenses out to 2030 with an assumed three percent annual inflation rate. The forecast considers what it would take to maintain and develop enhancements to models and run them bi-monthly.

Costs include monthly cloud computing capabilities support for the IT team running the code and staffing for quality control, to re-train the models, to consider improvements and ensure the data is available and useful to teams across PG&E. PG&E estimated the internal labor cost of staff using the fully loaded labor rate (hourly rate including overheads) multiplied by the staffing need described above.

EV Rates Marketing

PG&E's marketing forecast was developed with expenses from the 2024 marketing campaign, adding a three percent increase for additional campaign costs between the actuals from 2024 and expected costs in 2027. As noted above, in 2024, customers enrolled in the EV-2A rate generated an estimated $2.3 million in avoided costs through load shifting from peak to off-peak periods, which is over seven times the requested cost for EV Rates Marketing in 2027.

O&M for PG&E-Operated Charging Stations

PG&E's forecast accounts for the cumulative active chargers in our portfolio each year through 2030 and applies a unit cost multiplier, relying on over 10 years of historical data from experience owning and maintaining charging stations, to derive the total forecast. PG&E's forecast accounts for the age of EV chargers and the increasing demand on O&M resources as assets age. PG&E has contractual obligations to provide O&M support for customer charging stations for a specified period of time. Starting in 2028, the first of these contracts will expire with a corresponding decrease in the number of chargers in our portfolio, reflected in decreasing forecasted O&M costs in later years.

Electrification Labor

PG&E forecasts an increase of $2.2 million relative to 2024 recorded costs for electrification labor. This includes an increase of $0.9 million for TE labor in 2027 relative to 2024 recorded costs, and an incremental cost of $1.3 million for BE labor for which there were no recorded costs in 2024.

TE increases are attributable to the team's expanding scope and labor cost increases. While other TE labor costs are recovered through accounts associated with specific Commission-approved TE programs, or as described for the specific new initiatives proposed above, these expenses include labor primarily for regulatory, compliance, policy, strategy and EV rates support, in addition to the development and refinement of PG&E's portfolio of clean transportation customer offerings. This forecast also supports cross functional work across PG&E to drive EV adoption, downward rate pressure, and to achieve PG&E and the state's TE goals described above. Additionally, this includes labor and costs associated with clean transportation stakeholder and organizational engagement and outreach.

BE incremental labor costs are based on current PG&E load forecasts and emerging BE staffing needs. PG&E estimates a large shift in the way its customers use energy in their homes and businesses. Historically, including in the 2023 GRC, PG&E has not forecasted or recorded a labor budget associated with broad building electrification-related work. Thus, there is an urgency to establish dedicated strategic electrification resources to support the state's decarbonization and electrification

goals,[69] and as California Air Resources Board's (CARB)[70] and Bay Area Air Quality Management District's (BAAQMD)[71] appliance standards go into effect. While PG&E envisions existing staff supporting this ahead of 2027, it anticipates an additional need for three new full-time equivalents (FTE) and a minimal budget ($100,000 with a three percent annual escalation) for external contract support as it builds and scales this team. PG&E forecasts the three FTEs to be focused in the areas of regulatory, compliance, policy, strategy, integrated energy planning, strategic analyses, and cross-functional work across PG&E to enable BE at scale.

The electrification labor forecast methodology uses the fully loaded labor rate (hourly rate including overheads) multiplied by the forecasted headcount.

7. New Revenue Development (MWC EL)

a. Overview

PG&E requests an expense forecast for 2027 of $0 for the New Revenue Development (NRD) Department's provision of Non-Tariffed Products and Services (NTP&S). No capital forecast is requested. PG&E also requests review and approval of the balance of the Non-Tariffed Products and Services Memorandum Account (NTPSMA), as well as authorization to close the account. The NTPSMA records CPUC-jurisdictional New Revenue Development NTP&S expenses and revenues from 2023-2026. PG&E requests the annual difference between the New Revenue Development NTP&S revenues and expenses to be shared 50 percent to ratepayers and 50 percent to shareholders.

Upon closure of the NTPSMA, PG&E seeks authorization to track all New Revenue Development programs in the existing Non-Tariffed Balancing Accounts (NTBA), where costs and revenues will be tracked for disbursement, net of expense, to customers and shareholders via the 50/50 sharing mechanism.[72] All NTP&S

---

69 See Exhibit 4, Ch. 10, Section B for a broader discussion of these decarbonization and electrification goals.

70 Zero-emission space and water heater standards are contemplated by CARB to align with their adopted 2022 Scoping Plan. Additional information available here: Zero-Emission Space and Water Heater Standards | California Air Resources Board.

71 The Bay Area Air Quality Management District (BAAQMD) has adopted amendments to Rules 9-4 and 9-6 which regulate nitrogen oxide (NO_x) from gas appliances, available at: <https://www.baaqmd.gov/rules-and-compliance/rule-development/building-appliances> (accessed April 30, 2025).

72 50/50 sharing mechanism for NTBAs was approved in A.98-05-007 in D.99-04-021.

expenses for New Revenue Development would be shareholder funded, in contrast to PG&E's historical model for MWC EL, where ratepayers receive the benefit of all forecast net revenue in advance as a credit to the authorized revenue requirement.

New Revenue Development uses an available portion of a PG&E asset to deliver products and services, without encumbering utility operations. For example, telecommunication companies such as AT&T, Verizon and T-Mobile work with New Revenue Development resources to locate their cellular equipment on unused portions of PG&E's towers and poles. This provides a win-win solution for our customers: better cellular service without additional infrastructure.

The products and services provided earn net revenue that have been distributed to ratepayers on a forecast basis. Historically, the difference between forecasted revenue and forecasted expense was given as a credit to ratepayers and was reflected in Exhibit (PG&E-10), Chapter 13. Please refer to Tables 2-10 and 2-11 in the Ratepayer and Shareholder Benefit History section below.

In total, ratepayers received $167.5 million from 2018-2026. In addition to the financial benefits to utility customers, PG&E's NTP&S Program within New Revenue Development also provides significant additional benefits to customers, the state of California, and the public:

1) Real Estate Solutions: PG&E's existing infrastructure, such as poles, towers, streetlights or underground electrical conduit, has been used as a mutually beneficial real estate option for telecommunications companies for more than 25 years. Available capacity is space that would otherwise go unused but can be repurposed for the most current wireless or fiber technologies. Utility-owned infrastructure is sometimes located in densely populated or remote areas, so this access makes cellular and Wi-Fi coverage possible without disruptive or costly new construction. By using existing utility rights-of-way and structures, issues such as land use conflicts, permitting hurdles, and environmental impacts are minimized, and infrastructure efficiency is enabled.
2) Enhanced Emergency Response Network: PG&E's New Revenue Development team has partnered with wireless providers to support 5G equipment upgrades for better network reliability and enhanced emergency services such as E-911 and AT&T's First Net network for first responders.
3) A Bridge for the Digital Divide: PG&E infrastructure is located in both rural and urban areas throughout Northern and Central California. Rural and low-income

areas benefit with better mobile and broadband services when an existing PG&E asset is an option, saving telecommunication companies money on additional construction costs to extend their networks in hard-to-reach areas.

4) Preserves Existing Aesthetic: Some jurisdictions prefer utility assets such as substation properties or established structures (e.g., poles, streetlights or towers) for telecom network expansion since this option preserves the existing local aesthetic and environmental landscape. They may provide an efficient permitting process as a result, which then speeds up the process for improved cellular coverage for local communities. Some densely populated Bay Area communities *only* allow existing infrastructure for new cellular site construction.

5) Additional Societal Benefits: Partnering with telecommunications companies for their infrastructure needs allows them to improve wireless connectivity for local communities, which is attractive to businesses and supports remote work capability, providing a boost to local economic value.

PG&E's wireless co-location program is a significant business that could not have been fully anticipated in the 1990s. The capability to use utility assets in the future creates additional opportunity to help mitigate climate change and promote electrification—while lowering customers' utility bills—and underscores the importance of Non-Tariffed Products and Services as an avenue for promoting essential California policies.

TABLE 2-9
NEW REVENUE DEVELOPMENT
SUMMARY OF EXPENSE
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	EL	Develop New Revenue	$41,004	$58,295	$50,036	$37,477	$67,102	–	–	–
2		Total	$41,004	$58,295	$50,036	$37,477	$67,102	–	–	–

Note: Historical annual amounts for MWC EL are not included in Table 2-1 above.

b. Costs and Forecast

The expense forecast of $0 million is a decrease of $67.1 million compared to 2024 base year actuals of $67.1 million. The decrease is attributable to PG&E not requesting ratepayer funding for New Revenue Development. Shareholders will fund

New Revenue Development from 2027 and future years. All expense risk will be borne by shareholders.

The $67.1 million 2024 base year actuals are primarily attributed to Energy Consulting Services work in the Sustainable Solutions Turnkey (SST), Utility Energy Service Contracts (UESC), and Facilities Maintenance (FM) product lines. PG&E will sunset these programs over time to focus New Revenue Development resources on telecommunication co-locations, as well as future development of innovative non-tariffed products and services that support an affordable, clean energy future.

1) 2023 GRC Decision

In its 2023 GRC Final Decision, the Commission directed PG&E to file a separate application if the Company sought to continue the Non-Tariffed Products and Services program as ratepayer funded. In lieu of filing an application, PG&E filed AL 7228-E on March 31, 2024, requesting that the 2025-2026 years be shareholder-funded, and that all profits would be held in the NTPSMA. The Commission approved AL 7228-E on October 30, 2024. PG&E proposes in this testimony that ratepayers and shareholders equally share the net profit earned from New Revenue Development's products and services (refer to section B.7.c "Accounts", and PG&E (Exhibit-10) Chapter 16, Balancing Accounts for more detail).

The testimony in this chapter, as well as the following items, are the requirements outlined by the Commission in the 2023 GRC Final Decision.

2) Detailed Accounting[73]

1) Assets Used: New Revenue Development primarily utilizes employees and available capacity of utility assets to generate revenue. Employees in New Revenue Development coordinate the development, administration, customer education and outreach, and delivery of non-tariffed products and services to customers. Utility assets include: electric transmission towers, electric distribution poles, streetlights, underground electrical conduit, overhead fiber, PG&E available land, testing facilities, and intellectual property.
2) Value of Assets for 2024: The cost of all New Revenue Development employees working on Non-Tariffed Products and Services was approximately $6.6 million. The value of wireless attachments on transmission towers and PG&E available land was approximately $66.4 million. The value of distribution

73 See Exhibit (PG&E-6) Ch. 2, WP 2-46 to WP 2-50.

poles and streetlights was approximately $0.8 million. The value of underground electrical conduit and overhead fiber was approximately $4.3 million. The value of the testing facility for Applied Technology Services (ATS) was approximately $15.4 million. The value of patents used for NTP&S was approximately $0.2 million.

3) Costs Associated with Employee Benefits: For 2024, the cost associated with NRD employee benefits was approximately $2.7 million.
4) Allocation between State and Federal Jurisdictional Rates: Three of PG&E's Non-Tariffed Products and Services programs within New Revenue Development have transmission and distribution rates. For 2024, those are:
   - Facilities Maintenance: Transmission 24 percent; Distribution 76 percent;
   - Wireless: Transmission 83 percent; Distribution 17 percent; and
   - Fiber: Transmission 72 percent; Distribution 28 percent.
5) Profit Amounts and Interest in NTPSMA (Non-Tariffed Products and Services Memo Account): As of April 2025, the amount held in the NTPSMA is $11.1 million. The current interest accumulated is $0.5 million. The interest rate varies between four percent and six percent.

3) Ratepayer and Shareholder Benefit History

Tables 2-10 and 2-11 illustrate ratepayer and shareholder benefit from New Revenue Development's CPUC-jurisdictional programs. Ratepayers received the benefit from 2018-2024 through forecasted net revenues in the 2020 General Rate Case and 2023 General Rate Case. See Exhibit (PG&E-10), Chapter 13. Ratepayers also received $135.5 million from the previous rate case period for the GRC jurisdictional portion of the SBA Communication Corporation transaction, or $33.9 million per year from 2023-2026. In total, ratepayers received $167.5 million from 2018-2026. Shareholders received the difference between actual net revenues and forecasted net revenues from 2018-2022. Shareholders have not received benefit in 2023 nor 2024. The balance is held in the NTPSMA until the Commission decides how the balance will be distributed.

TABLE 2-10
BENEFIT TO RATEPAYERS
(THOUSANDS OF DOLLARS)

Line No.	2018	2019	2020	2021	2022	2023	2024
1	$3,620	$4,443	$4,843	$6,863	$4,576	$37,595	$37,778

TABLE 2-11
BENEFIT TO SHAREHOLDERS
(THOUSANDS OF DOLLARS)

Line No.	2018	2019	2020	2021	2022	2023	2024
1	$9,130	$8,427	$6,265	$3,089	$4,300	–	–

4) Shareholders Bear Any Risk of Potential Loss

PG&E's shareholders bear the risk that the financial results of New Revenue Development's Non-Tariffed Products and Services Program will not earn a sufficient return. Specifically, PG&E's shareholders bear the risk of any variance between: (i) PG&E's forecast costs and expenses and (ii) PG&E's actual costs and revenue consistent with standard forecasted cost-of-service ratemaking in the GRC for MWC EL. 2027 onward, shareholders will be 100 percent at risk of net losses for New Revenue Development's NTP&S program if program expenses are greater than actual program revenues.

5) Current Revenue Sharing Mechanism for All Categories and Proposal for 50/50 Split

1) GRC: PG&E provides a guaranteed reduction to its total GRC revenue requirement, commensurate with forecast profit. This is the primary mechanism for PG&E's CPUC-jurisdictional Non-Tariffed Products and Services Program.
2) Non-Tariffed Balancing Accounts (NTBAs): PG&E maintains a gas and electric balancing account for the one Non-Tariffed Products and Services offering (Mover Services) subject to a CPUC-jurisdictional 50/50 net profit sharing mechanism.
3) FERC Formula Rate: PG&E shares net revenues with customers through the 50/50 revenue-sharing mechanism applicable to PG&E's FERC-jurisdictional

NTP&S offerings within New Revenue Development. These programs are a portion of Facilities Maintenance, Fiber, and Wireless.

PG&E proposes a profit-sharing mechanism wherein PG&E's net profit from all New Revenue Development CPUC-jurisdictional non-tariffed offerings in MWC EL would be split equally (50/50) between customers and shareholders, and PG&E's shareholders would bear any overall losses in the balancing accounts on a portfolio basis.

6) Benefits to Ratepayers (Financial and Operational)

From 2018-2024, ratepayers received a credit of $32 million as a reduction to the revenue requirement. Ratepayers also received $135.5 million from the previous rate case period for the GRC jurisdictional portion of the SBA Communication Corporation transaction, or $33.9 million per year from 2023-2026. In total, ratepayers received $167.5 million from 2018-2026.

As mentioned above, PG&E's Non-tariffed Products and Services Program supported by New Revenue Development provides significant additional benefits to customers, the State, and the public in addition to reducing the revenue requirement through the forecasted profits. Examples of benefits to customers and the State include:

- Access to specialized and technical services, particularly in energy management (e.g., Applied Technology Services (ATS), Facility Maintenance, Sustainable Solutions Turnkey and Utility Energy Services Contracts);
- Facilitating the expansion of infrastructure and network technologies to enable business and communications growth at a lower cost (e.g., fiber co-location and wireless attachments);
- Reducing the disruption and potential safety risks associated with construction in roadways and other areas used by the public, by enabling attachments to existing infrastructure rather than trenching or building new poles and towers.
- Reducing disparities in telecommunications coverage and speed, including in remote areas as well as densely populated urban centers where utility assets are already located; and
- Additional reliability and communication benefits, particularly from fiber installation (e.g., static-wire protection on towers).

7) How The Program Aligns With the Commission's Affiliate Transaction Rules

The Commission first formalized its policy regarding non-tariffed products and services as part of restructuring the electric industry. Specifically, in 1997 the Commission adopted standards of conduct governing the relationship between regulated utilities and their affiliates. In that decision, the Commission delineated requirements for a utility's non-tariffed offerings. The Commission required that the following conditions, among others, be met:

a) The non-tariffed product or service utilizes a portion of a utility asset or capacity;
b) Such asset or capacity has been acquired for the purpose of and is necessary and useful in providing tariffed utility services;
c) The involved portion of such asset or capacity may be used to offer the product or service on a non-tariffed basis without adversely affecting the cost, quality or reliability of tariffed utility products and services;
d) The products and services can be marketed with minimal or no incremental ratepayer capital, minimal or no new forms of liability or business risk being incurred by utility ratepayers, and no undue diversion of utility management attention; and
e) The utility's offering of such non-tariffed product or service does not violate any law, regulation, or Commission policy regarding anticompetitive practices.

In 2010, the Commission standardized similar rules encouraging non-tariffed products and services by water and sewer utilities.

Thus, it has been consistent and longstanding "Commission policy to encourage the use of excess and unused utility capacity to benefit ratepayers, shareholders, and the California economy." Indeed, "[t]he public interest is served when utility property is used for other productive purposes without interfering with utility operations or service to utility customers."

The Commission-ordered external audit of PG&E's Non-Tariffed Products and Services program includes an evaluation of PG&E's compliance with the Affiliate Transaction Rules.

8) External Audit

In the 2023 GRC Decision, the Commission ordered an external audit of PG&E's Non-Tariffed Products and Services program. In May 2024, PG&E formally engaged

with KPMG to begin an audit of its program. The final report from this audit is expected to be completed in May 2025, and will be provided to the Commission.

The Commission-ordered external audit also includes the other NTP&S programs outside of MWC EL. This chapter focuses on the non-tariffed products and services administered by New Revenue Development that fall under MWC EL in PG&E's GRC. Some of PG&E's non-tariffed products and services are not administered by New Revenue Development because they reside within other functional areas at PG&E and fall under other MWCs in the GRC. These other non-tariffed products and services are included in *PG&E's Periodic Report on Non-Tariffed Products and Services*.

c. Accounts

1) Modify Accounts

PG&E requests that the Non-Tariffed Products and Services Balancing Accounts (NTBAs) be modified to include all CPUC-jurisdictional programs for 50/50 net profit sharing because this would be a consistent approach for all New Revenue Development programs and would provide benefit to both customers and shareholders. PG&E summarizes its request to retain, modify, or discontinue existing cost recovery mechanisms as described in this exhibit and associated revenue requirements in Exhibit (PG&E-10), "Results of Operations," Chapter 16 "Balancing Accounts."

2) Discontinue Accounts

The Non-Tariffed Products and Services Memorandum Account (NTPSMA) holds New Revenue Development's 2023 and 2024 net profit, earning interest until the Commission evaluates PG&E's Non-Tariffed Products and Services program as part of this testimony. PG&E proposes a 50/50 share of this net profit between ratepayers and shareholders after the Commission evaluates the program.

The account also currently holds 2025 and will hold 2026 net revenue while the Commission reviews the Non-Tariffed Products and Services program. AL 7228-E was approved by the Commission on October 30th, 2024, which proposed that annual net revenue from 2025-2026 be shared equally between ratepayers and shareholders through the Annual Electric and Gas True-Up process subject to final review in the 2027 General Rate Case. PG&E requests that the Non-Tariffed Products and Services Memorandum Account be closed after the program

evaluation and distribution of 2023-2026 net revenues. PG&E summarizes its request to retain, modify, or discontinue existing cost recovery mechanisms as described in this exhibit and associated revenue requirements in Exhibit (PG&E-10), Chapter 16.

8. Data and Energy Management Products (DEMP)

a. Overview

PG&Es Data and Energy Management Products team manages Customer Data Tools that serve as the technology platforms and services for various data used commonly in energy analysis, planning, and load management. Third parties (e.g., energy services providers, demand response providers, etc.), residential customers and businesses, private/public organizations, load serving entities (e.g., Community Choice Aggregators, Direct Access providers) utilize these tools to make energy-related decisions or provide energy-related services to customers. These tools and services include:[74]

- **Share My Data** allows a customer to authorize the release of their billing, account, and energy related data, including interval data, to a registered third party. Share My Data supports Electric Rule 24[75] and Electric Rule 25;[76]
- **Stream My Data** allows a residential and SMB customer with a Home Area Network-capable electric meter to view their electric demand in real time. This helps the customer correlate their actions and premise operations to their electric demand (kW) and usage (kWh);[77]
- **California Assembly Bill 802 (AB 802)/Building Benchmarking** enables building owners and authorized agents to share their energy data with an Energy Star Portfolio Manager (ESPM). In response to AB 802, PG&E deployed a web

---

[74] All the following tools and services, except Advanced Data Download are required by either California legislation, CPUC mandate, or CEC mandate.

[75] D.15-03-042 and D.17-06-005.

[76] D.13-09-025, p. 76, OP 18 required PG&E to file a new tariff to support ShareMyData. This tariff became electric Rule 25.

[77] D.11-07-056, pp. 166-167, OP 11.

portal to help benchmarking parties connect and map meters to a facility for aggregation and reporting;[78]

- **Advanced Data Download (ADD)** enables commercial customers with multiple accounts and service agreements to easily download their own electric or gas usage and billing information. This can be done for their accounts and service agreements with an interval meter. It is also known as Download My Data (DMD); and
- **Energy Data Request Program** allows the sharing of customer data, including usage data, with local governments, state and federal agencies, and academic researchers from nationally accredited institutions.[79]

TABLE 2-12
DEMP
SUMMARY OF EXPENSE
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted 2020	2021	2022	2023	2024	Forecast 2025	2026	2027
1	EZ	Manage Var Cust Care Processes	$1,328	$1,520	$1,116	$1,789	$2,004	$2,626	$2,558	$2,786
2		Total	$1,328	$1,520	$1,116	$1,789	$2,004	$2,626	$2,558	$2,786

b. Costs and Forecast

Data and Energy Management Products Customer Data Tools represent a variety of data access services and technologies. PG&E's forecast supports typical information technology-oriented activities necessary to maintain service, system robustness, performance, and security. PG&E's Customer Data Tools operate in a fast-changing technology landscape that requires constant system maintenance, testing, revisions, and upgrades to continue to serve an ever-increasing user base and ever-changing requirements. The forecast is based on historical as well as expected needs in the coming years.

Program Operations Costs: The DEMP team oversees various data tool services that are offered under regulatory requirements. PG&E incurs costs to maintain these

---

78 CEC Docket 15-OIR-05, available at: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=15-OIR-05> (accessed April 17, 2025).

79 D.14-05-016.

programs, products, and services as well as necessary feature enhancements. Additionally, IT costs related to operations, support, and feature enhancements are funded out of this budget. Though it varies from year-to-year, a large portion of the budget is expended on labor to provide effective and responsive service to our stakeholders.

Lifecycle Maintenance and Improvements Costs: PG&E strives to maintain and increase the value of programs and services offered by DEMP and its data tools. Typically, IT systems operationally mature, but also may degrade due to changes in usage patterns. As such natural lifecycle of specific information technology unfold across time, PG&E finds that system stability and security can only be maintained with constant upkeep and upgrades, including application of industry best practices as they develop in the industry at large. These come in the form of system patches, refactoring, and upgrades of licenses and products. Furthermore, DEMP proposes that it budget for and maintain continual development efforts to help manage inevitable lifecycle changes of specific IT technologies.[80]

Enterprise Infrastructure Costs: DEMP's data tools leverage and is part of PG&E's enterprise IT infrastructure. Utilizing these services lowers PG&E's overall costs, including the costs for DEMP. PG&E's enterprise IT systems often change and evolve to respond to customer, enterprise, and regulatory needs. These changes trigger the need for system upgrades and enhancements in order to maintain a stable and effective set of programs and services.

Summary of Costs: Especially in recent years, regulatory and external stakeholder engagements have highlighted PG&E's need to maintain a robust data access platform, and to update this platform to match emerging needs. These include ever-expanding requirements for services such as energy efficiency, load management, and demand flexibility from numerous types of providers including, but not limited to, demand response aggregators and energy services providers. The above categories: (a) Program Operation Costs, (b) Lifecycle Maintenance and Improvements Costs, and (c) Enterprise Infrastructure Costs are necessary to continue the services provided by the Customer Data Tools.

---

80 Future license and contract costs are based on historical amounts. The actual costs can be determined after the work scope has been established, statement of work issued, a request for quote issued, and responses received per work item. A continual development and operations team enables a stable technology platform that delivers continuous value.

The increases are due to an additional FTE, work associated with implementing deferred improvements to IT infrastructures, improvements to business processes, and better monitoring of system availability and performance. Contract costs also show some increase due to migration of base infrastructures to adequately licensed and support products and technologies. This spending is to provide a higher level of service for the users.

C. Compliance

1. Regionalization

Pursuant to Ordering Paragraph (OP) 45 of D.23-11-069:

Pacific Gas and Electric Company (PG&E) shall provide the following in PG&E's 2027 general rate case: (1) additional recorded and forecasted cost information to be presented in the testimony for PG&E's regionalization activities associated with Regional Vice Presidents, their Executive Assistants, their Regional Support Staff, and the Regionalization Program Management Office for all Major Work Categories (and related subcategories of MAT Codes) including staffing salaries and benefits, information technology costs, real estate costs, and any other miscellaneous costs associated with regionalization; (2) the safety performance improvements that have occurred because of regionalization, including the performance improvements of individual enterprise -level safety metrics tracked at a regional level and the performance improvements of individual region -specific safety metrics; and (3) comparison of the actual costs of regionalization implementation, including ongoing human resource costs, to PG&E's estimates of costs for regionalization implementation that PG&E presented in Application 20-06-011.

Please see Exhibit (PG&E-6) Chapter 2, WP 2-42 for PG&E's compliance with D.23-11-069, OP 45 (1). See Exhibit (PG&E-7), "Shared Services and IT", Chapter 1 "Enterprise Health and Safety" for PG&E's compliance with D.23-11-069, OP 45 (2). See Exhibit (PG&E-6) Chapter 2, WP 2-43 for PG&E's compliance with D23-11-069, OP 45 (3).

2. Report Pursuant to 2023 GRC Memorandum of Understanding Between Small Business Utility Advocates and PG&E on Supplier Diversity Initiatives

Pursuant to Section 6.1.1 of the 2023 Memorandum of Understanding (MOU) Between Small Business Utility Advocates (SBUA) and PG&E on Small Business Customer Engagement:

PG&E agrees to explore and provide a report to SBUA and the Commission by the next General Rate Case about specific initiatives PG&E will be undertaking to support its use of small business suppliers, as defined by the California Department of General Services, as follows:

1.) Recognize employees who have successfully integrated new small businesses into the PG&E supply chain.

2.) Help small businesses navigate the bidding process and address barriers to entry that prevent small businesses from competing effectively.

PG&E's Supplier Diversity Initiatives Report is attached as Attachment A of this chapter in compliance with Section 6.1.1 of the 2023 MOU Between SBUA and PG&E on Small Business Customer Engagement.

D. Accounts

1. California Network of 211

California 211 Providers Network (211 CA) was previously recovered in the Wildfire Gas and Safety Costs filed in June 2023. 211 CA costs are included in the WMPMA through 2026. PG&E is seeking approval to recover 211 CA costs through the WMBA in the 2027 GRC proceeding moving forward to align with the work this cost supports.

TABLE 2-13
CEPO WMPMA AND WMBA ACCOUNTS
SUMMARY OF EXPENSE
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	Account	MWC	2021 Recorded	2022 Recorded	2023 Recorded	2024 Recorded	2025 Forecast	2026 Forecast	2027 Forecast
1	WMPMA	IG	$1,256	$915	$1,477	$1,686	$1,680	$1,680	–
2	WMBA	IG	–	–	–	–	–	–	$1,714
3		Total	$1,256	$915	$1,477	$1,686	$1,680	$1,680	$1,714

2. Regional Plan Memorandum Accounts

On June 30, 2020, PG&E filed Application 20-06-011 requesting approval of its Regionalization Proposal. In its filing, PG&E requested authorization to establish the RPMAs effective as of the Application's filing date to record incremental costs PG&E incurs in connection with the development and implementation of regionalization.

On October 2, 2020, the Commission issued the Assigned Commissioner Scoping Memo and Ruling, which ruled that PG&E was "authorized to establish a memorandum account to track the costs of regionalization, effective June 30, 2020."

On February 19, 2021, PG&E filed AL 4385-G/6091-E to establish the RPMAs to track and record the incremental costs incurred related to developing and implementing PG&E's Regionalization Plan in accordance with the Commission's directives. Such costs may include amounts related to facilities and real estate, information technology, compensation of new regional officers and other personnel, and other costs. AL 4385-G/6091-E has a Tier 1 designation and was effective June 30, 2020.

In this rate case period, PG&E is proposing to eliminate the RPMAs because PG&E has developed a reasonable forecast of program costs and included that forecast as part of this GRC, rendering the account no longer necessary. PG&E proposes to close the RPMAs upon completion of a reasonableness review of the costs. PG&E's application proposes a Track 2 reasonableness review for recorded costs associated with RPMAs for 2021-2026 costs. PG&E will submit its showing in accordance with the procedural schedule established by the Commission. PG&E summarizes its request to retain, modify, or discontinue existing cost recovery mechanisms as described in this exhibit and associated revenue requirements in Exhibit (PG&E-10), "Results of Operations," Chapter 16 "Balancing Accounts."

E. Conclusion

Based on the evidence discussed above and the associated attachments and workpapers, PG&E requests that the Commission grant the requests presented in this Chapter.

(PG&E-6)

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 2

ATTACHMENT A

REPORT PURSUANT TO 2023 GRC MEMORANDUM OF UNDERSTANDING BETWEEN SMALL BUSINESS UTILITY ADVOCATES AND PACIFIC GAS AND ELECTRIC COMPANY ON SUPPLIER DIVERSITY INITIATIVES

REPORT PURSUANT TO
2023 GRC MEMORANDUM OF UNDERSTANDING
BETWEEN
SMALL BUSINESS UTILITY ADVOCATES
AND
PACIFIC GAS AND ELECTRIC COMPANY
ON
SUPPLIER DIVERSITY INITIATIVES

This report discusses the obligation outlined in Section 6.1.1 of the 2023 Memorandum of Understanding Between Small Business Utility Advocates and Pacific Gas and Electric Company on Small Business Customer Engagement, which states:

PG&E agrees to explore and provide a report to SBUA and the Commission by the next General Rate Case about specific initiatives PG&E will be undertaking to support its use of small business suppliers, as defined by the California Department of General Services, as follows:

1.) Recognize employees who have successfully integrated new small businesses into the PG&E supply chain.

2.) Help small businesses navigate the bidding process and address barriers to entry that prevent small businesses from competing effectively.

A. Small Business Procurement Overview

PG&E aims to provide equitable opportunities for small businesses to participate in our supply chain. We provide technical assistance and outreach to contribute to the growth of these businesses in partnership with PG&E's Small Business Engagement team, small business agencies, community-based organizations and advocacy groups.

A few of PG&E's objectives under our Small Business Program are to recognize coworkers who have successfully integrated new small business into our supply chain and to minimize barriers to entry by providing training opportunities like helping businesses navigate the bidding process. In PG&E's most recent Economic Impact Report (2023), we shared that PG&E tier one small business direct impact to the community was $814 million which resulted in 3,721 jobs supported and $310 million in wages reported. As a federal contractor, PG&E also met its small business percentage goal by spending $300 million with small businesses.

NOTE: Small business spend, reported to the General Services Administration (GSA), is reported at the contract level, based on North American Industry Classification System code (NAICS) and size standards. Small business spend is reported in PG&E's Commercial Plan for the period of January 1 through December 31.

B. Recognition Program

PG&E provides opportunities for coworkers to self-nominate or receive recognition through its Small Business Recognition Program via monetary and non-monetary awards. The Small Business Coworker Recognition Program is an opportunity to express appreciation and recognition of coworkers who support compliance and doing business with small businesses. The Program aims to recognize our coworkers who are delivering breakthrough outcomes that support our small business suppliers, compliance, and the overall Program. Coworker results should be meaningful accomplishments that go above and beyond business as usual.

PG&E's official Small Business Recognition Program standard outlines the guidelines and framework for coworker recognition. Below are behaviors that coworkers must exhibit to be considered for an award:

- Helping small businesses navigate the bidding process
- Providing outreach and technical assistance opportunities
- Integrating new small businesses into PG&E's supply chain
- Recommending a change to a process to include a small business in an opportunity

- Improving small business program compliance
- Removing barriers to small business doing business with PG&E
- Suggesting a pilot program to provide an opportunity to a small business
- Increasing the number of contract opportunity announcements posted year over year for a given portfolio
- Mentoring a small business
- Participating in a small business outreach event

In 2023, PG&E recognized four coworkers for small business achievements. We will continue to encourage coworkers to consider small businesses in the planning of work to contribute as direct suppliers our subcontractors.

C. Technical Assistance Program

PG&E is passionate about supporting businesses and even more committed to ensuring that they operate as a vital link in the supply chain. PG&E's Technical Assistance Program's (TAP) objective is to give suppliers, at all levels, the tools and resources needed to grow their business with PG&E and other customers.

PG&E's Technical Assistance Program helps suppliers learn on their own time via PG&E's free Learning Management System (LMS). This platform features training modules on various topics relating to corporate supply chains. PG&E also hosts in-person trainings and virtual webinars, where suppliers can ask questions and get answers in real time. Additionally, suppliers can participate in PG&E TAP's monthly web-based gatherings to connect and interact with corporate supply chain professionals, better known as "Coffee Chats."

In 2024, PG&E collaborated with an industry expert and former buyer to create a new Technical Assistance Program training module, "RFP Readiness," an in-person, four-week training program focused on preparing to respond to requests for proposal. This two-part course taught small businesses how to effectively do the following:

- Analyze readiness to respond to Requests For Proposal. (RFPs)
- Identify ways to improve RFP responses to stay competitive.
- Establish sound decision making: "go or no-go" on an RFP.
- Avoid common mistakes that might cost points and lose RFPs.

Twenty-four suppliers participated in the “RFP Readiness” cohort and many others have taken the online course. PG&E is slated to hold another cohort in 2025. Through our monthly coffee chats, PG&E has invited a host of Procurement buyers who shared best practices on how to avoid pitfalls in responding to bids and to address questions about PG&E’s bid process.

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 3

CUSTOMER PROGRAMS

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 3
CUSTOMER PROGRAMS

TABLE OF CONTENTS

A. Introduction and Summary 3-1

1. Overview 3-1

2. Summary of Request 3-2

a. Expense 3-4

b. Memorandum of Understanding With the National Diversity Coalition 3-5

B. Customer Programs Forecast 3-8

1. Rate Programs and Tools (MWC EZ) 3-8

a. Rate Operations and Tools (MWC EZ) 3-9

1) Overview 3-9

2) Forecast 3-9

b. Residential Rates Implementation (MWC EZ) 3-11

1) Overview 3-11

2) Forecast 3-11

c. Non-Residential Rates Implementation (MWC EZ) 3-14

1) Overview 3-14

2) Forecast 3-14

d. Cross Customer Class Programs (MWC EZ) 3-16

1) Overview 3-16

2) Forecast 3-17

2. Income-Qualified Programs (MWC EZ, MWC GM) 3-18

a. Natural Gas Appliance Testing (MWC GM) 3-19

1) Overview 3-19

2) Forecast 3-19

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 3
CUSTOMER PROGRAMS

TABLE OF CONTENTS
(CONTINUED)

b. Disadvantaged Communities and Community Based Organizations Cross Coordination (MWC EZ) 3-20

1) Overview 3-20

2) Forecast 3-21

c. Cooling Centers (MWC EZ) 3-22

1) Overview 3-22

2) Forecast 3-23

d. LIHEAP Portal Maintenance (MWC EZ) 3-23

1) Overview 3-23

2) Forecast 3-24

e. Food Bank Discount Program (MWC EZ) 3-24

1) Overview 3-24

2) Forecast 3-24

C. Memorandum of Understanding With the National Diversity Coalition 3-25

D. California Distributed Generation Statistics Memorandum Account 3-26

E. Conclusion 3-27

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 3
CUSTOMER PROGRAMS

A. Introduction and Summary

1. Overview

This chapter demonstrates that Pacific Gas and Electric Company's (PG&E or the Company) 2027 expense forecast for Customer Programs is reasonable and should be approved by the California Public Utilities Commission (CPUC or Commission). Customer Programs activities primarily support customers with new rates, rate structure changes, and rate transitions in the form of Marketing, Education and Outreach (ME&O) and Rate Tools that help customers enroll on their best rate. In addition, Customer Programs acts as the business lead for managing changes in PG&E's billing system to implement new rates, rate changes, and rate transitions, including development of business requirements. The costs to implement these changes in PG&E's billing system itself are not requested in this chapter; they are forecasted in Exhibit (PG&E-6), Chapter 11 as part of the Rates, Billing & Revenue Value Stream.[1]

Customer Programs activities also support affordability programs for customers that are low-income, disadvantaged, and have qualifying medical needs through programs including Natural Gas Appliance Testing (NGAT) provided as part of the Energy Savings Assistance (ESA) program, Cooling Centers, and the Medical Baseline program. Decarbonization and load flexibility policy goals are also supported through the Electric Home rate plan (E-ELEC), time varying and dynamic rates (Time-of-Use (TOU), SmartRate and Peak Day Pricing (PDP)), and Greenhouse Gas (GHG) credits. In addition, Customer Programs supports customer affordability and an improved customer experience by providing tools and programs to help customers select their best rate and lower their bills.

PG&E notes that incremental costs to implement certain rate changes, new rates, rate transitions, and customer assistance programs are not

---

[1] See Exhibit (PG&E-6), Ch. 11

included in the Customer Programs 2027 GRC forecast because the scope of implementation cannot yet be forecasted. The Commission has authorized PG&E to record these specific incremental costs to the following memorandum accounts for cost recovery consideration in a future General Rate Case or separate application:

- COVID-19 Pandemic Protections Memorandum Account;[2]
- Disconnections Memorandum Account;[3]
- Dynamic and Real Time Pricing (RTP) Memorandum Account;[4,5]
- Income-Graduated Fixed Charge Memorandum Account;[6]
- Net Billing Tariff (NBT) and Subtariffs Memorandum Subaccount;[7] and
- Percentage of Income Payment Plan (PIPP) Memorandum Account.[8]

2. Summary of Request

PG&E requests that the Commission approve:

- PG&E's expense forecasts in Section A.2, Table 3-1 below; and
- The Memorandum of Understanding Between the National Diversity Coalition and PG&E (NDC MOU).

PG&E does not present a 2027-2030 capital expenditures forecast for Customer Programs activities.

---

2 This includes incremental costs associated with implementing the CBO Arrears Case Management Pilot, pursuant to D.24-02-046, p. 36, Conclusion of Law (COL) 20.

3 D.23-08-049, p. 37, Ordering Paragraph (OP) 5, authorized PG&E to record costs related to the Medical Baseline Eligible Population Study to the Disconnections Memorandum Account.

4 PG&E has also requested an additional new memorandum and/or balancing or account in the DFOIR (R.22-07-005) Track B proceeding to record costs for the California Energy Commission's Load Management Standard requirements including the costs to implement a single statewide tool.

5 These decisions have authorized PG&E to record costs to the Dynamic and RTP Memorandum Account: D.21-11-017 (Dynamic Business Electric Vehicle (BEV) rate; D.22-08-002 (Residential and C&I RTP Pilots); D.22-10-024 (Non-NEM Export Pilot); D.23-04-008 (E3 Model for Fixed Charge); D.24-01-032 (Expanded RTP Pilots).

6 D.24-05-028, pp. 109,156, COL 41, authorized PG&E to record costs related to implementing the Residential Income Graduated Fixed Charge (Base Services Charge) to the Income-Graduated Fixed Charge Memorandum Account.

7 D.22-12-056, p. 194, authorized PG&E to record costs related to implementing the Net Billing Tariff to the NBT Memorandum Account.

8 D.21-10-012, p. 87, COL 28, authorized PG&E to record costs related to implementing the Percentage of Income Payment pilot to the PIPP Memorandum Account.

TABLE 3-1
CUSTOMER PROGRAMS
SUMMARY OF EXPENSE
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted 2020	2021	2022	2023	2024	Forecast 2025	2026	2027	Workpaper Reference
1	EZ	Manage Var Cust Care Processes	$26,062	$41,563	$27,381	$16,081	$15,263	$15,366	$17,543	$21,500	WP 3-1
2	GM	Manage Energy Efficiency-NonBA	5,767	6,422	5,322	5,285	5,362	5,875	5,722	6,635	WP 3-1
3		Total	$31,828	$47,984	$32,703	$21,366	$20,625	$21,241	$23,265	$28,135	

(a) Table 3-1 includes costs recorded to the Residential Rate Reform Memorandum Account (RRRMA) and the California Distributed Generation Statistics Website Memorandum Account (CDGSWMA) under MWC EZ. See Residential Rates Implementation, Section B.1.b and Cross Customer Class Programs, Section B.1.d. for more detail.

a. Expense

Figure 3-1 below provides an expense walk identifying key drivers for the $7.5 million increase in the 2027 forecast ($28.1 million) compared to 2024 recorded costs of $20.6 million. Each driver is summarized below:

- $2.9 million increase in costs for Rate Operations and Tools activities for vendor-provided support for new already adopted rates, customer experience enhancements, and technological enhancements. The vendor-provided support includes all front-end and back-end software development work. There were no recorded GRC costs for these activities in 2024 because the new rates work was memo account funded as explained in footnote 16. Upgrading customer tools software includes new activities in 2027 that were not included in the forecast for the previous 2023 GRC. In addition, activities previously funded by Net Billing Tariff (NBT) and Subtariffs Memorandum Subaccount;
- $2.3 million increase in costs for Residential Rates Implementation activities due to increased high bill support, expanding Medical Baseline program outreach to include non-High Fire Threat Areas, Budget Billing acquisition and awareness campaigns, and revision and expansion of SmartRate customer outreach activities. Costs for these activities are partially offset by a reduction in electrification related measurement and evaluation work, and outreach costs due to combining campaigns;
- $1.3 million increase in costs for NGAT due to 7,309 more Natural Gas Appliance Tests in 2027 than 2024 primarily due to ramp up of the ESA Multi Family Whole Building Program;[9]
- $0.6 million increase in costs for Non-Residential Rates Implementation activities due to anticipated maintenance activities

[9] Exhibit (PG&E-6), WP 3-17 to WP 3-18 provides 2024 recorded and 2027 forecasted costs for Natural Gas Appliance Testing (NGAT) activities.

for PDP Defaults, finalizing the transition from legacy TOU rates to new TOU rates and addressing metering issues;[10]

- $0.2 million increase in costs for Cross Customer Class Programs activities to continue support for the Commission's Distributed Generation Statistics (DG Stats) website. In Section D below, PG&E proposes to close the California Distributed Generation Statistics Website Memorandum Account-2 (CDGSWMA-2) beginning in 2027, and use GRC expense funding for these activities;
- $0.1 million increase in costs for Disadvantaged Communities (DAC) and Community-Based Organization (CBO) Cross Coordination due to labor escalation associated with staff that supports CBO partnerships that serve DACs and coordinates engagement on new programs and best practices to better serve customers in these communities; and
- $0.03 million increase in the 2027 forecast for Miscellaneous Income-Qualified Programs (IQP) Support, which includes ongoing support for Cooling Centers, Low-Income Home Energy Assistance Program (LIHEAP) Portal Maintenance, and Food Bank Discount Program.

PG&E discusses its forecasted Customer Programs activities in more detail in Section B.

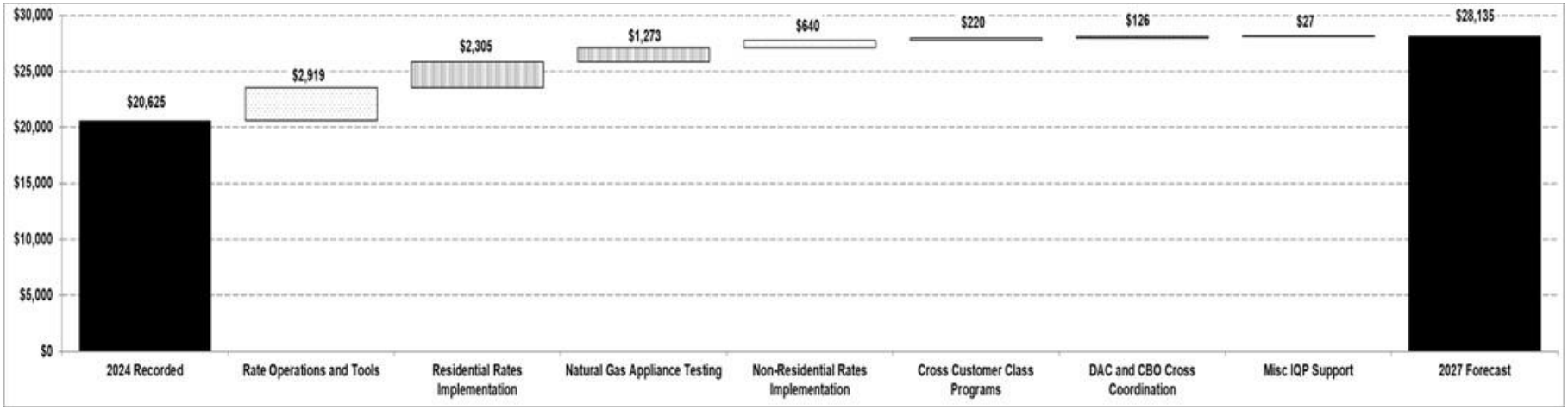
b. Memorandum of Understanding With the National Diversity Coalition

PG&E also presents a MOU with NDC for Commission approval. The MOU includes key areas of partnership between PG&E and NDC to support diverse communities, including, among other things, leveraging new pathways for outreach and education, as well as supporting

[10] D.18-08-013 adopted several settlements (including Standby, Medium, and Large; Small Light and Power; and Agricultural Settlement Agreement motions filed January 31, 2018, January 29, 2018, and March 30, 2018, respectively) that specified new rate plan options and new TOU periods. Eligible commercial and industrial, and agricultural customers were transitioned in March 2021. New PDP event hours were also implemented with the new mandatory rates in March 2021.

economic opportunities for communities of color. The MOU is described in Section C below and is attached as Attachment 3A to this chapter.

FIGURE 3-1
CUSTOMER PROGRAMS
EXPENSE WALK (2024-2027)
(THOUSAND OF NOMINAL DOLLARS)



B. Customer Programs Forecast

This section describes the expense forecast for Customer Programs activities, which are categorized into the Major Work Categories (MWC): (1) Rate Programs and Tools and (2) Income-Qualified Programs.

1. Rate Programs and Tools (MWC EZ)

Rate Programs and Tools includes four initiatives: (a) Rate Operations and Tools; (b) Residential Rates Implementation; (c) Non-Residential Rates Implementation; and (d) Cross Customer Class Programs. Table 3-2 below identifies the 2024 recorded costs and 2027 forecast for Rate Programs and Tools initiatives. These initiatives are designed to ensure customers have meaningful and comprehensible rate plan options, support customers as they enroll in and continue on their selected rate plan (or as they are automatically enrolled, in the case of rate transitions), enable customers to easily switch to a different rate plan that is more affordable or better meets their needs and preferences, and enable customers to monitor their usage and their bills. These initiatives also include the operation of Critical Peak Pricing (CPP) programs, the Budget Billing program, and Medical Baseline program education and outreach.[11]

TABLE 3-2
CUSTOMER PROGRAMS
RECORDED AND FORECAST EXPENSE – RATE PROGRAMS AND TOOLS (BY INITIATIVE)
(THOUSAND OF NOMINAL DOLLARS)

Line No.	Initiative	Recorded Adjusted 2024	Forecast 2027
1	Rate Operations and Tools	$7,554	$10,473
2	Residential Rates Implementation	3,921	6,226
3	Non-Residential Rates Implementation	1,540	2,180
4	Cross Customer Class Programs	1,490	1,710
5	Total	$14,505	$20,589

[11] PG&E's CPP programs include SmartRate for residential customers and PDP for non-residential customers. CPP programs provide customers with a reduced electric rate in the summer season in exchange for shifting or reducing energy during event days. Budget Billing is a payment management program that helps level customers' bills so they avoid seasonal spikes. The Medical Baseline program provides support before, during and after Public Safety Power Shutoffs (PSPS), and bill reduction for customers with qualifying medical needs.

a. Rate Operations and Tools (MWC EZ)

1) Overview

Rate Operations and Tools includes costs to provide general program management across all Rate Programs and Tools initiatives, including business and regulatory planning, compliance, budgeting, governance, program alignment, and stakeholder management. Rate Operations and Tools also includes costs to perform business analysis and requirements for new rates, rate structure changes, rate transitions and to provide and maintain rate tools.

Examples of rate tools include rate comparisons, usage data analytics, bill comparison analytics, and energy alerts which are available online in PGE.com's "Your Account" portal. These tools help customers select the best rate plan for their household by helping them to understand and change rate plans, make choices about energy options that impact their bills (e.g., energy efficiency measures, solar, storage, electric vehicles, income qualified discounts), and manage their usage and costs to make their bills more affordable. Additional details for the initiatives and activities in this section are provided in the Rate Operations and Tools workpapers.[12]

2) Forecast

Table 3-3 below identifies the historical (2020-2024) and forecast (2025-2027) costs for Rate Operations and Tools. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $2.9 million increase from 2024 recorded costs, and the customer benefits associated with the forecasted work.

---

[12] Exhibit (PG&E-6), WP 3-5 to WP 3-7 provides 2024 recorded and 2027 forecasted costs for Rate Operations and Tools activities.

TABLE 3-3
CUSTOMER PROGRAMS
HISTORICAL AND FORECAST EXPENSE – RATE OPERATIONS AND TOOLS
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	Manage Var Cust Care Processes	$5,119	$3,338	$4,047	$5,609	$7,554	$6,116	$7,278	$10,473
2		Total	$5,119	$3,338	$4,047	$5,609	$7,554	$6,116	$7,278	$10,473

PG&E's 2027 forecast for Rate Operations and Tools activities is $10.5 million, which is $2.9 million (39 percent) higher than 2024 recorded costs. PG&E developed its 2027 forecast with 2024 recorded costs as a starting point because they reflect the costs necessary to support Rate Operations and Tools for current rate options, which have become increasingly complex in recent years. PG&E then developed a forecast for 2027 costs based on its understanding of new rates that will be in effect during the 2027 GRC cycle and the work that will be necessary to update rate tools to accommodate these new rates.

For example, as shown in Table 3-3 above, recorded costs for Rate Operations and Tools increased from 2022 to 2023, which was due to product management costs related to the implementation of new rates and rate tool development. In addition, recorded costs increased again in 2024 driven by contract labor to analyze and address enhancements to PG&E's customer tools for complex rate customers, and customer research focused on optimizing PG&E's portfolio of rate options to achieve California's policy goals.

PG&E's forecasted $2.9 million increase for 2027 for Rate Operations and Tools is due to increased costs for rate tool backend updates needed to build future rates, support integration with the new billing system, and increased vendor fees. In addition, in 2024,

a significant portion of these activities were funded by memorandum accounts and therefore not reflected in 2024 GRC recorded costs.[13]

b. Residential Rates Implementation (MWC EZ)

1) Overview

Residential Rates Implementation includes planning, operational implementation,[14] and customer ME&O for residential rate plan changes. PG&E uses a combination of general awareness efforts and direct outreach to inform residential customers about new rate plans, rate plan changes, rate plan transitions, available rate plan options, and energy management programs and tools. Additional details for the initiatives and activities in this section are provided in the Residential Rates Implementation workpapers.[15]

2) Forecast

Table 3-4 below identifies the historical (2020-2024) and forecast (2025-2027) costs for Residential Rates Implementation. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $2.3 million increase from 2024 recorded costs, and the customer benefits associated with the forecasted work.[16]

---

[13] For example, in 2024, $740,600 was recorded in the NBT memo account for vendor rate modeling and tool development, and $5.6 million in expense and $1.2 million in capital was recorded to the Dynamic and Real Time Pricing memo account for these activities.

[14] Operational implementation includes modifications to the billing system, manual billing processes and contact center readiness.

[15] Exhibit (PG&E-6), WP 3-8 to WP 3-10 provides 2024 recorded and 2027 forecasted costs for Residential Rates Implementation activities.

[16] A portion of the adjusted costs were recorded to the Residential Rate Reform Memorandum Account (RRRMA). These costs are included in Table 3-4 for contextual purposes only.

TABLE 3-4
CUSTOMER PROGRAMS
HISTORICAL AND FORECAST EXPENSE – RESIDENTIAL RATES IMPLEMENTATION
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	Manage Var Cust Care Processes	$15,977	$32,037	$18,348	$6,770	$3,921	$4,563	$5,133	$6,226
2		Total	$15,977	$32,037	$18,348	$6,770	$3,921	$4,563	$5,133	$6,226

PG&E's 2027 GRC forecast for Residential Rates Implementation activities is $6.2 million, which is $2.3 million (59 percent) more than 2024 GRC recorded costs of $3.9 million. PG&E developed its 2027 forecast with 2024 recorded costs as a starting point because they provide the most recent and accurate representation of Residential Rates Implementation activities and their associated costs. Specifically, recorded costs prior to 2024 for Residential Rates Implementation activities were significantly higher due to the implementation of ME&O associated with the residential default TOU transition.[17] Since the default TOU transition is complete, 2020-2023 recorded costs are not an appropriate foundation for forecasting 2027 costs. With 2024 as a starting point, PG&E forecasted its expectation of increased costs associated with work that will be necessary in 2027 to support Residential Rates Implementation activities.

In 2024, PG&E incurred $3.9 million in GRC expense on targeted campaigns to promote rate plan options and tools, support customers through rate plan transitions, and implement operational changes necessary for rate plan changes. The 2024 GRC-funded Residential Rates Implementation activities included:

- Targeted summer and winter bill impact general awareness campaigns for customers via email, digital media, on-hold

[17] The Commission's Final Decision in the 2023 GRC Phase I (D.23-11-069), p. 895, COL 290 granted PG&E's unopposed request to close the Residential Rate Reform Memorandum Account (RRRMA) and allow any related residential rate reform costs to be recovered through GRC revenues starting in 2023. Costs recorded to the RRRMA are included in the total amounts shown in Table 3-4 for 2020 through 2022 to provide a complete picture of Residential Rates Implementation costs since 2020.

messaging played when a customer calls into the call center, and website updates with seasonal tips and tools for managing energy usage;

- Monthly TOU Welcome direct mail and email campaigns to customers who voluntarily enrolled in a TOU rate plan;
- Medical Baseline program outreach activities, including but not limited to, acquisition emails, letters, digital ads, as well as Spanish TV informational spots, program enrollment confirmation emails and letters; and
- SmartRate™ Critical Peak Pricing Program default communications, season preparation activities, and program effectiveness evaluation and measurement study.

The $2.3 million increase in PG&E's 2027 forecast for Residential Rates Implementation activities is due primarily to increased high bill support, Medical Baseline program outreach expansion to non-High Fire Threat Areas, Budget Billing acquisition and support, and revision of SmartRate outreach collateral to improve messaging and to attract new Net Billing Tariff (NBT) customers.[18] Specifically, PG&E's 2027 targeted education and outreach will include:

- Education, rate plan options, programs, and tools for customers most likely to be impacted by rate plan changes, including continued outreach to diverse communities and in various formats to ensure all customer segments are captured;
- ME&O to help residential customers select alternative electric rate plans, support their transition to applicable new rate plans, and help them adjust to new rate plans by managing their energy usage and bills;
- Medical Baseline program enhancements, including customer acquisition/retention campaigns both in High Fire Threat and non-High-Fire Threat Areas, and additional In-Home Support

[18] SmartRate outreach modifications for NBT customers will not be charged to the Net Billing Tariff and Subtariffs Memorandum Subaccount (NBT Memo SubAccount). The (NBT Memo SubAccount) only covers NBT marketing and outreach.

Services and other healthcare providers outreach to increase MBL program awareness and enrollments;[19]

- Rate Mailers operations to provide all eligible residential customers with an annual electric rate comparison to inform them of available electric rate plan options;
- Expanded Budget Billing outreach to help customers manage the seasonal peak bills and better budget their energy expenses;
- ME&O execution to support customer awareness around the non-tiered TOU rate (E-TOU-D) and E-ELEC rate; and
- Outreach to CBOs to support their efforts to educate customers about their rate options.

c. Non-Residential Rates Implementation (MWC EZ)

1) Overview

Non-Residential Rates Implementation includes planning and implementation of rate plan changes for commercial, industrial, and agricultural customers. It also includes ME&O to help non-residential customers select alternative electric rate plans, support their transition to applicable new rate plans, and help them adjust to new rate plans by managing their energy usage and bills. It also includes PDP maintenance, evaluation and outreach activities. Additional details for the initiatives and activities in this section are provided in the Non-Residential Rates Implementation workpapers.[20]

2) Forecast

Table 3-5 below identifies the historical (2020-2024) and forecast (2025-2027) costs for Non-Residential Rates Implementation. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $0.6 million

---

19 Pursuant to decisions in the Disconnections Order Instituting Rulemaking (D.20-06-003) and the Public Safety Power Shutoff Order Instituting Investigation (D.19-05-042).

20 Exhibit (PG&E-6), WP 3-11 to WP 3-13 provides 2024 recorded and 2027 forecasted costs for Non-Residential Rates Implementation activities.

increase from 2024 recorded costs, and the customer benefits associated with the forecasted work.

TABLE 3-5
CUSTOMER PROGRAMS
HISTORICAL AND FORECAST EXPENSE – NON-RESIDENTIAL RATES IMPLEMENTATION
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	Manage Var Cust Care Processes	$3,678	$4,019	$2,559	$1,878	$1,540	$2,159	$2,329	$2,180
2		Total	$3,678	$4,019	$2,559	$1,878	$1,540	$2,159	$2,329	$2,180

PG&E developed its 2027 forecast with 2024 recorded costs as a starting point because they provide the most recent and accurate representation of Non-Residential Rates Implementation activities and their associated costs. Recorded costs prior to 2024 for Non-Residential Rates Implementation activities were higher due to the implementation of ME&O activities associated with the mandatory Non-Residential TOU transition and new PDP event hours. Specifically, the 2020-2023 recorded costs are not an appropriate foundation for forecasting 2027 due to the higher costs associated with the voluntary enrollment period for the new TOU rates beginning in 2020, the majority of non-residential customers transitioning to the mandatory TOU rate plans and new PDP event hours in 2021, and subsequent bi-annual transitions from 2022-2023. Therefore, PG&E used 2024 recorded costs as a starting point as it was more representative to forecast 2027 Non-Residential Rates Implementation activities.

PG&E's 2027 forecast for Non-Residential Rates Implementation activities is $2.1 million, which is a $0.6 million increase from 2024 recorded costs of $1.5 million. This increase is attributed to the following activities:

- Pre- and post-transition outreach and customer inquiry support for the transition of the remaining commercial, industrial, and agricultural customers from flat and legacy rate schedules to

rate schedules with new TOU periods as required by D.18-08-013;

- Outreach and customer inquiry support for transitioning eligible non-residential customers onto the PDP program on a bi-annual basis with 24 months of interval data on TOU rates to PDP;[21]
- Support for PDP customers including in-season communications and event notifications;
- PDP program effectiveness measurement and evaluation;
- Digital outreach to support customers during the summer season when rates are higher;
- Outreach to customers who stand to benefit from a different rate plan encouraging them to switch to their best available plan; and
- Content marketing to promote rate plan options and money-saving resources throughout the year.

d. Cross Customer Class Programs (MWC EZ)

1) Overview

Cross Customer Class Programs include providing the annual GHG credit on customers' bills, solar tariff activities to enforce CPUC compliance requirements and to support solar customers with managing their bills, and, beginning in 2027, will also include the Distributed Generation Statistics Website that is currently funded through the CA Distributed Generation Stat Web Memorandum Account (CDGSWMA). Section D below includes a detailed description of DG Stats Website costs and a plan to close the CDGSWMA in January 2027, and begin funding this work using GRC expense dollars. Additional details for the initiatives and activities in this section are provided in the Cross Customer Class Programs workpapers.[22]

---

[21] D.18-08-013 and D.19-05-010 in 2019 Rate Design Window approved settlements for the PDP program that included resuming the default of eligible customers onto the PDP program.

[22] Exhibit (PG&E-6), WP 3-14 to WP 3-16 provides 2024 recorded and 2027 forecasted costs for Cross Customer Class Programs activities.

2) Forecast

Table 3-6 below identifies the historical (2020-2024) and forecast (2025-2027) costs for Cross Customer Class Programs. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $0.2 million increase from 2024 recorded costs, and the customer benefits associated with the forecasted work.

TABLE 3-6
CUSTOMER PROGRAMS
HISTORICAL AND FORECAST EXPENSE – CROSS CUSTOMER CLASS PROGRAMS
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	Manage Var Cust Care Processes	$1,120	$1,859	$1,963	$1,147	$1,490	$1,974	$2,237	$1,710
2		Total	$1,120	$1,859	$1,963	$1,147	$1,490	$1,974	$2,237	$1,710

PG&E developed its 2027 forecast with 2024 recorded costs as a starting point because there has been minimal variation in 2020-2024 recorded costs and because 2024 recorded costs provide the most recent and accurate representation of the Cross Customer Class Programs activities and their associated costs. With 2024 as a starting point, PG&E forecasted its expectation of increased costs associated with work that will be necessary in 2027 to support Cross Customer Class Programs activities.[23]

PG&E's $0.2 million increase in the 2027 forecast relative to 2024 is driven by an $82,000 increase for ME&O to support a growing population of solar customers billed on Net Energy Metering (NEM), NEM 2.0, NBT and subtariffs, as well as labor to implement all of the solar tariffs and subtariffs for four time-of-use

[23] Table 3-6 includes costs that were or will be funded through the CDGSWMA for 2020-2026. In 2024, PG&E incurred $99,429 in costs related to the DG Stats website funded through the CDGSWMA. As described in Section D, DG Stats cost will transition from the CDGSWMA to GRC expense starting in 2027.

rates that PG&E plans to deliver in 2027.[24] In addition, PG&E proposes to transition ongoing funding for the Distributed Generation Statistics Website (DG Stats) from the CDGSWMA to GRC expense starting in 2027 with an increase of $75,000. An additional cost driver is approximately $63,000 of escalation to implement and administer the annual gas California Climate Credit for residential households and to conduct marketing education and outreach as directed by the Commission in D.15-10-032.[25]

2. Income-Qualified Programs (MWC EZ, MWC GM)

IQP includes five initiatives: (a) NGAT in support of the ESA Program; (b) DAC CBO Cross Coordination; (c) Cooling Centers; (d) LIHEAP Portal Maintenance; and (e) the Food Bank Discount Program. These initiatives support various IQP activities that are not funded through existing balancing and memorandum accounts. Table 3-7 below compares the 2024 recorded costs and 2027 forecast for IQP initiatives. Additional details for the initiatives and activities in this section are provided in the IQP workpapers.[26]

TABLE 3-7
CUSTOMER PROGRAMS
RECORDED AND FORECAST EXPENSE – INCOME-QUALIFIED PROGRAMS (BY INITIATIVE)
(THOUSAND OF NOMINAL DOLLARS)

Line No.	Initiative	Recorded Adjusted 2024	Forecast 2027
1	Natural Gas Appliance Testing	$5,362	$6,635
2	DAC and CBO Cross Coordination	600	726
3	Cooling Centers	128	150
4	LIHEAP Portal Maintenance	23	25
5	Food Bank Discount Program	7	10
6	Total	$6,120	$7,546

[24] This includes PG&E electric rate schedules AG-A3, AG-B2, B10-R, and E-ELEC, which will include virtual, aggregation, and multiple-tariff sub tariffs only.

[25] D.15-10-032, pp. 51-52.

[26] Exhibit (PG&E-6), WP 3-17 to WP 3-21 provides 2024 recorded and 2027 forecasted costs for Income-Qualified Program activities.

a. Natural Gas Appliance Testing (MWC GM)

1) Overview

PG&E administers Natural Gas Appliance Testing (NGAT) in conjunction with the installation of certain energy efficiency (EE) measures as part of the Energy Savings Assistance (ESA) Program, including general EE multi-family and single-family residential programs to ensure the safety of participating customers. The number of NGATs performed is driven by demand and dependent on the volume of energy efficiency measures requested to be installed by customers. After installing EE measures, NGATs are performed in all homes that have at least one natural gas appliance. An NGAT involves testing the ambient air inside the residence to help ensure that the appliances are working properly and that the home is safe. The NGATs are performed by ESA contractors who work as subcontractors for the four ESA Program implementers. PG&E's Central Inspection Program team also performs an additional Quality Assurance (QA) NGAT on a random sample of premises, as specified in the "Statewide ESA Program 2021-2026 Cycle Policy and Procedures Manual."[27]

PG&E intends to propose in its upcoming IQP application, which will be filed in 2025, to rebid these contracts at the start of the new program cycle, currently slated to commence in 2028. This will ensure that market-based compensation is maintained for services performed by ESA contractors.

2) Forecast

Table 3-8 below identifies the historical (2020-2024) and forecast (2025-2027) costs for NGAT. In the section below, PG&E describes the methodology for its 2027 forecast and the drivers of the $1.3 million increase from 2024 recorded costs.

---

27 Statewide Energy Savings Assistance Program 2021-2026 Cycle Policy and Procedures Manual (Nov. 2022), available at: https://www.sdge.com/sites/default/files/documents/Statewide%20ESA%20Program%20PP%20Manual_Nov%202022%20Final.pdf (accessed April 30, 2025).

TABLE 3-8
CUSTOMER PROGRAMS
HISTORICAL AND FORECAST EXPENSE – NGAT
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	GM	Manage Energy Efficiency NonBA	$5,767	$6,422	$5,322	$5,285	$5,362	$5,875	$5,722	$6,635
2		Total	$5,767	$6,422	$5,322	$5,285	$5,362	$5,875	$5,722	$6,635

In 2024, PG&E recorded $5.4 million in GRC expense to perform 43,326 NGATs and 7,914 NGAT QA tests. The number of NGATs performed in 2024 reflects a reduction in the ESA homes treated goal adopted by the Commission in D.21-06-015 for 2021-2026, as well as an increase in homes treated through the ESA Multifamily Whole Building Program. The ESA Multifamily Whole Building Program was first launched partway through 2023, with 2024 representing the first full year the program was in operation.

PG&E's 2027 forecast for NGAT is $6.6 million to perform 51,074 NGATs and 7,936 NGAT QA tests, which is $1.3 million more than 2024 recorded costs. This increase in costs relative to 2024 can be attributed to an estimated twelve percent increase in the number of ESA homes to be treated, a seventeen percent increase in the percent of ESA-treated homes receiving an NGAT, and a four percent increase in the contract labor cost.[28] PG&E developed this forecast using the 2026 authorized target (76,599 homes) for the number of homes treated through the ESA Program in 2027.

b. Disadvantaged Communities and Community Based Organizations Cross Coordination (MWC EZ)

1) Overview

PG&E's DAC team focuses on inclusion and participation of DACs in PG&E's service territory by: (1) participating in emergent

28 Exhibit (PG&E-6), WP 3-17 to WP 3-18 provides 2024 recorded and 2027 forecasted costs for NGAT activities.

regulatory proceedings and legislative developments to drive focus on engagement in DACs, (2) engaging external stakeholders to support programs, and (3) increasing customer awareness in DACs of available programs even those not administered by PG&E, with a focus on educating customers on all assistance available in our service territory. DACs may be disproportionately burdened by multiple sources of pollution and suffer from a combination of economic, health, and environmental burdens. Several current CPUC proceedings and decisions contain DAC-related directives, including but not limited to the following:

- Building Decarbonization OIR (R.19-01-011);
- Integrated Resource Planning (R.16-02-007); and
- Gas Transition OIR (R.23-09-012).

Similarly, PG&E's CBO team is developing a comprehensive strategy and approach for engaging CBOs by building awareness and knowledge of services available to support customers in DACs in PG&E's service territory using a more holistic approach. PG&E collaborates with CBOs on outreach and engagement of its most vulnerable customers and will increase this collaboration as more CBOs are involved in developing and implementing PG&E customer programs.

2) Forecast

Table 3-9 below identifies the historical (2020-2024) and forecast (2025-2027) costs for DAC and CBO Cross Coordination. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $0.1 million increase from 2024 recorded costs, and the customer benefits associated with the forecasted work.

TABLE 3-9
CUSTOMER PROGRAMS
HISTORICAL AND FORECAST EXPENSE – DAC AND CBO CROSS COORDINATION
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	Manage Var Cust Care Processes	$57	$210	$372	$511	$600	$607	$626	$726
2		Total	$57	$210	$372	$511	$600	$607	$626	$726

PG&E developed its 2027 forecast by applying escalation to 2024 recorded costs for DAC and CBO Cross Coordination activities. This forecast reflects increased spending relative to 2020-2022 recorded costs that are associated with PG&E's MOU with NDC during the 2023 GRC period and PG&E's expectation to expand these activities in the 2027 GRC period by committing to spend $0.25 million per year, for a total of $1 million. This reflects a slight increase from the MOU under the 2023 GRC period, in which PG&E agreed to spend the equivalent of $0.2 million per year, for a total of $0.8 million.[29] PG&E spent $0.5 million in 2023 and $0.6 million in 2024 on DAC and CBO Cross Coordination since the MOU went into effect.

c. Cooling Centers (MWC EZ)

1) Overview

Cooling Centers are facilities open to the public during summer months when the daily temperature exceeds a temperature threshold. The Commission launched Cooling Centers as a pilot program in 2007 and approved the Cooling Center Program effective April 15, 2008.[30] Initially, PG&E funded Cooling Centers through the CARE Program. In December 2017, the Commission directed PG&E to fund Cooling Centers through its GRC on an

---

29 A.21-06-021, Exhibit (PG&E-6-E), p. 3-AtchA-5, Memorandum of Understanding Between National Diversity Coalition and Pacific Gas and Electric Company on Support for Communities of Color and Underserved Communities, Section 2.4.

30 The pilot program was approved in Resolution E-4080, (May 3, 2007), and the ongoing Cooling Center Program proposal was approved in an August 8, 2008 disposition letter approving ALs 3220-E and 3220-E-A, effective April 15, 2008.

ongoing basis.[31] In 2024, PG&E partnered with 61 Cooling Centers to enhance relief to customers during periods of high summer heat.

2) Forecast

TABLE 3-10
CUSTOMER PROGRAMS
HISTORICAL AND FORECAST EXPENSE – COOLING CENTERS
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	Manage Var Cust Care Processes	$112	$100	$79	$138	$128	$150	$150	$150
2		Total	$112	$100	$79	$138	$128	$150	$150	$150

Table 3-10 above identifies the historical (2020-2024) and forecast (2025-2027) costs for Cooling Centers. Historical spend between 2020 and 2024 has consistently been close to $0.1 million. PG&E forecasts $0.15 million for Cooling Centers in 2027, which is based on escalation of 2024 recorded costs.

d. LIHEAP Portal Maintenance (MWC EZ)

1) Overview

The state of California, through local LIHEAP agencies, pledges funding to assist income-qualified customers that are struggling to pay their energy bills. In D.20-06-003,[32] the Commission directed PG&E to develop a LIHEAP Portal to process pledges for customers faster and more efficiently.

[31] D.17-12-009, Attachment 1 (modifying D.16-11-022), p. 496, OP 114.

[32] D.20-06-003, p. 151, OP 27.

2) Forecast

TABLE 3-11
CUSTOMER PROGRAMS
HISTORICAL AND FORECAST EXPENSE – LIHEAP PORTAL MAINTENANCE
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	Manage Var Cust Care Processes	$0	$0	$13	$25	$23	$25	$25	$25
2		Total	$0	$0	$13	$25	$23	$25	$25	$25

PG&E forecasts $25,000 for LIHEAP Portal Maintenance in 2027 (see Table 3-11 above). This was based on applying escalation to 2024 recorded costs and reflects PG&E's expectation that forecasted costs will include ongoing maintenance with no significant changes to the functionality of the portal.

e. Food Bank Discount Program (MWC EZ)

1) Overview

The Food Bank Discount Program was adopted by the Commission in D.18-08-013 and permits food bank customers to receive a discount on eligible gas and electric bill amounts. Food banks annually certify their eligibility for the discounts by providing a copy of their MOU executed with the California Department of Social Services that qualifies them to participate in The Emergency Food Assistance Program (TEFAP) in California.

2) Forecast

TABLE 3-12
CUSTOMER PROGRAMS
HISTORICAL AND FORECAST EXPENSE – FOOD BANK DISCOUNT PROGRAM
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	Manage Var Cust Care Processes	$0	$0	$0	$1	$7	$12	$12	$10
2		Total	$0	$0	$0	$1	$7	$12	$12	$10

PG&E began incurring GRC program management expense for the Food Bank Discount Program in 2023. As shown in Table 3-12 above, PG&E incurred $7,000 in GRC expense for program management labor of the Food Bank Discount Program in 2024. PG&E forecasts $10,000 for program management in 2027, which represents escalation from 2024 recorded costs.

C. Memorandum of Understanding With the National Diversity Coalition

PG&E presents a MOU for Commission approval between PG&E and the NDC. The MOU is attached as Attachment 3A to this chapter.

The MOU includes key areas of partnership between PG&E and NDC to support diverse communities, such as leveraging new pathways for outreach and education and supporting economic opportunities for communities of color. In the MOU, the parties agree to terms that provide, among other things, that:

- PG&E will undertake a commitment to spend a total of $3.2 million over the 4-year 2027 GRC period on the Technical Assistance Program (TAP) and report to NDC on an annual basis the amount spent supporting TAP activities including the amount of labor tracked to the TAP order;
- PG&E will confer with NDC and solicit its feedback regarding ways to increase outreach to small and micro businesses;
- PG&E will continue to invite low-income and communities-of-color advocates to participate on a Customer Advisory Panel, that will occur at least two times per year and will be attended by at least one officer from PG&E;
- PG&E will host an annual meeting with NDC that is attended by at least one Senior Vice President;
- PG&E will spend a total of $1.0 million over the 4-year 2027 period towards work with CBOs. PG&E and NDC intend for there to be flexibility in the use of this funding to support CBO partnerships. As part of this work, PG&E will work with CBOs to disseminate in multiple languages, general information about financial assistance and bill savings programs, rate options, wildfire safety-related topics and emergency preparedness or other emergent initiatives to help reach vulnerable customers. PG&E will work with NDC to help identify appropriate CBOs to include in outreach education and awareness solicitation opportunities; and

- For the 2027 GRC period, pursuant to the Commission's General Order 156, PG&E will continue to report its performance against the Supplier Diversity categories in its GO 156 report to the Commission on an annual basis.

D. California Distributed Generation Statistics Memorandum Account

The Distributed Generation (DG) Stats Website was adopted for PG&E, SDG&E and SCE (the Joint IOUs) by the Commission in D.14-11-001. Resolution E-5030 authorized the California Distributed Generation Statistics Website Memorandum Account (CDGSWMA) for each of the IOUs and required them to request cost recovery for the DG Stats Website costs recorded to the memorandum account in their next GRC Phase I proceeding. PG&E began recording costs to the CDGSWMA in 2021. It requested to close this memorandum account effective December 31, 2022, per the 2023 GRC application filed on June 30, 2021.[33]

In Resolution E-5030, the Commission clarified that PG&E may file a Tier 2 Advice Letter within 60 days of the effective date of the rates established by its test year 2023 GRC to recover the balance in the CDGSWMA. PG&E submitted Advice Letter 7133-E-A on July 5, 2024 to recover $0.2 million recorded to the CDGSWMA in 2021 and 2022. The Commission approved this request and PG&E closed the CDGSWMA.

In addition, the Commission advised in Resolution E-5030 that the Director of the Energy Division would define the scope of work and set funding levels for the DG Stats contract through a letter to the IOUs sent at least once every three years. PG&E received this letter on August 12, 2022, which stated the funding level for the website would remain at $990,000 every 3 years, or $330,000 each calendar year,[34] and the contract would be extended for an additional 12 months, with a new expiration date of December 31, 2023.

In order to continue funding the DG Stats website, the August 12, 2022 letter stated that if PG&E seeks to record costs beyond the December 31, 2022 expiration of the memorandum account, PG&E should file a Tier 1 Advice Letter to extend the memorandum account end date to 60 days after the effective date

---

33 This request was approved in PG&E's 2023 GRC, D.23-11-069 and PG&E filed Advice Letter 4835-G/7088-E on December 14, 2023 to close the CDGSWMA.

34 PG&E's share of the $330,000 funding is 43.7 percent or $144,210.

of rates approved in the 2027 GRC. However, since PG&E had already requested to close the original memorandum account in the 2023 GRC, PG&E proposed to continue with this closure and open a new memorandum account, the California Distributed Generation Statistics Website Memorandum Account – 2 (CDGSWMA-2).[35] This account has the same administrative function as the original account and tracks DG Stats expenses over the 2023 GRC rate case cycle.

PG&E is proposing to discontinue recording expenses into the California CDGSWMA-2 by December 31, 2026 and close the account subsequent to a completion of a reasonableness review, and PG&E proposes a review of 2023-2025 costs in Track 2 of this GRC as described in its application. PG&E will submit its showing in accordance with the procedural schedule established by the Commission.

Beginning January 1, 2027, DG Stats costs would be funded using GRC expense dollars consistent with their inclusion in the 2027 expense forecast. PG&E summarizes its request to discontinue existing cost recovery mechanisms as described in this exhibit and associated revenue requirements in Exhibit (PG&E-10), "Results of Operations," Chapter 16 "Balancing Accounts."

E. Conclusion

Based on the evidence discussed above and the associated attachments and workpapers, PG&E requests that the Commission grant the requests presented in this chapter for Customer Programs activities.

---

35 PG&E filed Advice Letter 6715-E on September 28, 2022 to establish the CDGSWMA-2.

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 3

ATTACHMENT A

MEMORANDUM OF UNDERSTANDING BETWEEN NATIONAL DIVERSITY COALITION AND PACIFIC GAS AND ELECTRIC COMPANY

MEMORANDUM OF UNDERSTANDING BETWEEN NATIONAL DIVERSITY COALITION AND PACIFIC GAS AND ELECTRIC COMPANY ON SUPPORT FOR COMMUNITIES OF COLOR AND UNDERSERVED COMMUNITIES

The National Diversity Coalition (NDC) and Pacific Gas and Electric Company (PG&E) (collectively, the Parties) hereby enter into this Memorandum of Understanding (MOU) pertaining to the revenue requirement phase of PG&E's upcoming test year 2027 General Rate Case (GRC).

ARTICLE 1

RECITALS

1.1 On or about May 15, 2025, PG&E will file its 2027 GRC application, which will address electric distribution, gas distribution, and electric generation rates for the years 2027 through 2030.

1.2 NDC is an advocacy-oriented organization of community-based, faith-based, and non-profit leaders working collectively for greater economic empowerment for underserved communities. NDC intends to participate as an intervenor in PG&E's 2027 GRC.

1.3 PG&E provides electricity and gas service to much of northern and central California. PG&E provides a number of services, programs and support for its customers, including underserved communities.

1.4 In PG&E's 2017 GRC, NDC and PG&E joined an all-party settlement agreement, which, among other things, addresses issues related to communities of color and underserved communities for 2017 through 2019. The settlement agreement was approved by the California Public Utilities Commission (Commission) in its Decision 15-09-001.

1.5 In PG&E's 2020 GRC, NDC and PG&E joined a multi-party settlement agreement that was approved by the California Public Utilities Commission (Commission) in its Decision 20-12-005. The settlement incorporated a stipulation between NDC and PG&E addressing issues related to communities of color and underserved communities for 2020 through 2022 (2020 Stipulation).

1.6 In PG&E's 2023 GRC, NDC and PG&E entered an MOU that was approved by the California Public Utilities Commission (Commission) in Decision 20-12-005. The MOU further continued to address issues related to underserved communities for 2023 through 2027 (2023 MOU).

1.7 The Parties value their longstanding, collaborative relationship in supporting the needs of underserved communities and have worked collaboratively to implement the 2023 MOU. As an outgrowth of that collaboration, the Parties commenced discussions of matters of common interest for the years 2027-2030 (2027 GRC Period). These discussions led to the current MOU.

ARTICLE 2

TERMS

2.1 Technical Assistance Program (TAP)

2.1.1 PG&E will spend the equivalent of $.8 million per year, for a total of $3.2 million over the 4-year, 2027 GRC Period. The Parties agree that this amount is reasonable to continue to support the development of small and micro businesses, and request that the Commission approve an $.8 million annual forecast for TAP for the 2027 GRC Period in the approved revenue requirement.

2.1.2 If the Commission adopts an amount lower than $.8 million annually for TAP for the 2027 GRC Period, PG&E's spending commitment described in 2.1.1 shall be

adjusted accordingly.

2.1.3 The spending commitment described in Section 2.1.1 will include external costs and PG&E internal labor in support of the TAP.

2.1.4 All costs applied to the spending commitment will be tracked directly to the TAP order.

2.1.5 PG&E will report to NDC on an annual basis, the amount spent supporting TAP activities including the amount of labor tracked to the TAP order.

2.1.6 PG&E will confer with NDC and solicit its feedback regarding ways to increase outreach to small and micro businesses.

2.1.7 Should PG&E spend less than $4 million in total over the 2027 GRC Period, PG&E will refund any underspend to customers through an appropriate regulatory mechanism.

2.2 Customer Advisory Panels

2.2.1 PG&E shall continue to invite advocates for underserved communities to participate on a Customer Advisory Panel. The scope of the advisory panel will include ongoing guidance relating to PG&E's overall outreach efforts, including but not limited to: (1) providing input on new and existing programs, agreeing on the charter for the advisory panel and tracking progress on effectiveness of advisory group; (2) providing progress updates on projects affecting underserved communities, including the TAP, and Marketing, Education and Outreach to underserved communities; (3) partnering with organizations that are headquartered in PG&E's service territory, serve historically marginalized communities, and fulfill services within PG&E's service area; and (4) recommending strategies that will help

small minority businesses grow.

2.2.2 Meetings of the Customer Advisory Panel will occur twice a year, which may be in-person or remote. PG&E will compensate for reasonable meeting expenses.

2.2.3 To increase the awareness and responsiveness of PG&E executive leadership to issues of concern in underserved communities, PG&E and NDC agree that at least one officer from PG&E's Regulatory Affairs Organization and Customer and Enterprise Solutions Organization will be present at each meeting of the Customer Advisory Panel.

2.2.4 To the extent any PG&E organizational changes occur during the 2027 GRC Period that affect the attendees or organizations specified in Section 2.2, PG&E will confer with NDC and make a good faith effort to identify the equivalent attendees and organizations to participate in the Customer Advisory Panels.

2.3 Executive Level Meetings

2.3.1 NDC and PG&E value a cooperative working relationship between PG&E executives and community leaders. In order to further strengthen and develop that relationship, PG&E will host an annual meeting at which at least one Senior Vice President will be in attendance along with those senior officers relevant to the agenda.

2.3.2 At least one Senior Vice President of PG&E will attend the annual meetings over the 2027 GRC Period.

2.3.3 Participants at these meetings will discuss issues pertaining to the implementation of the provisions of this MOU and matters pertaining to PG&E's service or programs in marginalized communities. Representatives of NDC and PG&E will work together to prepare an agenda in advance of the meeting. This meeting is separate from the Customer Advisory Panel meetings described above. NDC will be compensated for reasonable meeting expenses.

2.3.4 To the extent any PG&E organizational changes occur during the 2027 GRC Period that affect the attendees or organizations specified in Section 2.3, PG&E will confer with NDC and make a good faith effort to identify the equivalent attendees and organizations to participate in the Executive Level Meetings.

2.4 Community Based Organizations

PG&E will spend the equivalent of $0.25 million per year, for a total of $ 1 million over the 4-year 2027 GRC Period (2027-2030), towards work with CBOs. The Parties intend for there to be flexibility in the use of this funding to support CBO partnerships. As part of this work, PG&E will work with CBOs to disseminate in multiple languages, general information about financial assistance and bill savings programs, rate options, wildfire safety-related topics and emergency preparedness or other emergent initiatives to help reach vulnerable customers. PG&E will work with NDC to help identify appropriate CBOs to include in outreach education and awareness solicitation opportunities.

2.5 Marketing and Outreach

2.5.1 PG&E will work with the Customer Advisory Group regarding the marketing and outreach of its existing Income Qualified Bill Assistance programs and other relevant programs.

2.6 General Order 156 Performance

2.6.1 PG&E will continue to report its performance against the Supplier Diversity categories in its GO 156 report to the Commission on an annual basis.

2.6.2 PG&E will continue to explore ways to support small and micro businesses in its service area. NDC may provide recommendations any on this topic to PG&E for discussion and further exploration.

ARTICLE 3

TERM AND GENERAL PROVISIONS

3.1 Term and Effectiveness: This MOU shall only become enforceable upon the Commission's issuance of a final decision in PG&E's 2027 GRC that specifically approves and funds the provisions of this MOU. The commitments in this MOU shall then remain effective for four years or until the Commission issues a final decision in PG&E's subsequent GRC, whichever is earlier.

3.2 Non-Precedential: The Parties agree that this MOU is non-precedential.

3.3 Joint Support: The Parties shall jointly request Commission approval of this MOU.

3.4 Entire Agreement: This MOU represents the entire understanding and agreement of the Parties with respect to the matters described herein, and, except as described herein, supersedes and cancels any and all prior oral or written agreements, principles, negotiations, statements, representations, or understandings among the Parties pertaining to these matters.

3.5 Resolution of Issues: The Parties agree that this MOU addresses all issues NDC has historically raised in the revenue requirement phase of parties' General Rate Cases. NDC may participate in PG&E's 2027 GRC by submitting testimony, participating in settlement discussions, evidentiary proceedings or otherwise, consistent with the terms of this MOU.

3.6 Amendment: The MOU may be amended or changed only by a written agreement signed by the Parties.

3.7 Counterparts: This MOU may be executed in counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument.

3.8 Unified, Integrated Agreement: The Parties agree that if the Commission fails to adopt this MOU in its entirety and without modification, the Parties shall meet and confer within

15 days thereof to discuss whether they can resolve the issues raised by the Commission's actions. If the Parties cannot mutually agree to resolve the issues raised by the Commission's actions, the MOU shall be rescinded, and the Parties shall be released from their obligation to support the MOU. Thereafter, the Parties may pursue any action they deem appropriate, but agree to cooperate in establishing a procedural schedule. Parties reserve all rights set forth in Rule 12.4 of the Rules of Practice and Procedure.

In Witness Whereof, intending to be legally bound, the undersigned have duly executed this Agreement on behalf of the parties they represent.

NATIONAL DIVERSITY COALITION	PACIFIC GAS AND ELECTRIC COMPANY
By: _____	By: _____
Name: Faith Bautista Faith Bautista Chief Executive Officer	Name: Vincent Davis Vincent Davis Senior Vice President, Customer & Enterprise Solutions
Date: April 25, 2025	Date: April ___, 2025

(PG&E-6)

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 4

CUSTOMER COMMUNICATIONS

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 4
CUSTOMER COMMUNICATIONS

TABLE OF CONTENTS

A. Introduction and Summary 4-1
1. Overview 4-1
2. Summary of Request 4-1
a. Expense 4-3
B. Customer Communications Forecast 4-6
1. Customer Outreach and Communications (MWC EZ) 4-6
a. Overview 4-6
b. Costs and Forecast 4-6
2. Wildfire and PSPS Customer Safety Communications (MWC IG) 4-7
a. Overview 4-7
1) Paid Advertising 4-8
2) Direct-to-Customer Communications 4-8
b. Costs and Forecast 4-9
3. Traditional Customer Safety Communications (MWC LB) 4-10
a. Overview 4-10
b. Costs and Forecast 4-11
4. External Communications (MWC LJ) 4-11
a. Overview 4-11
b. Costs and Forecast 4-12
5. Internal Communications (MWC LI) 4-13
a. Overview 4-13
b. Costs and Forecast 4-13
6. Miscellaneous Communications Support (MWC FA) 4-14
a. Overview 4-14

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 4
CUSTOMER COMMUNICATIONS

TABLE OF CONTENTS
(CONTINUED)

b. Costs and Forecast 4-14

C. Conclusion 4-15

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 4
CUSTOMER COMMUNICATIONS

A. Introduction and Summary

1. Overview

This chapter demonstrates that Pacific Gas and Electric Company's (PG&E or the Company) expense forecast for its Customer Communications activities are reasonable and should be approved. Customer Communications' expense forecast supports PG&E's outreach, education, and engagement with customers, employees, media, and the public on topics such as safety, bill support, and region-specific updates on infrastructure upgrades. Customer Communications provides customers with essential information that provides important updates about work PG&E plans to do, helps keep customers safe, and connects/improves customers' experiences with our products and services. It also ensures our coworkers are provided with information about our work to stay connected to the goals and progress of our Company.

2. Summary of Request

PG&E requests the Commission approve PG&E's expense forecasts in Section A.2, Table 4-1 below. PG&E does not present a 2027-2030 capital expenditures forecast for Customer Communications activities.

TABLE 4-1
SUMMARY OF EXPENSE
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	Manage Var Cust Care Processes	$3,129	$2,484	$2,912	$3,034	$3,974	$3,484	$3,516	$6,565
2	FA	Spc A&G/Oth Csts-Bud Dept	–	104	84	86	170	184	191	198
3	IG	Manage Var Bal Acct Processes	19,049	14,941	9,439	9,426	8,271	6,297	6,179	6,293
4	LB	Prov Advertising Svcs	–	3,575	4,071	4,070	4,284	4,188	4,184	4,212
5	LI	Prov Corporate Communication	1,435	936	997	2,233	1,964	1,374	1,375	1,381
6	LJ	Prov Corp Affairs Svcs	5,523	5,967	5,591	5,363	4,900	5,127	5,299	6,616
7		Total	$29,136	$28,005	$23,094	$24,212	$23,564	$20,654	$20,745	$25,266

a. Expense

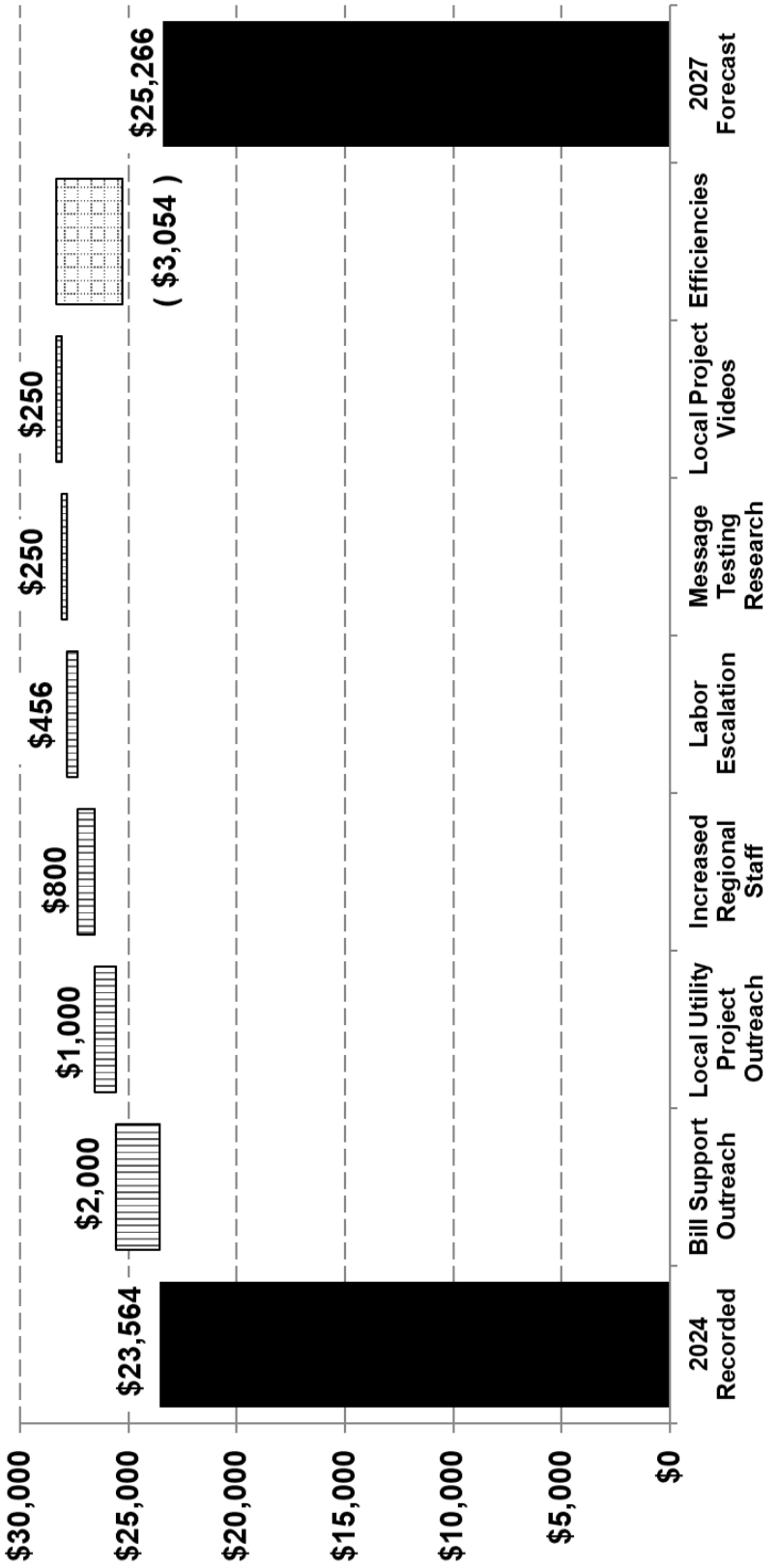
Figure 4-1 below provides an expense walk identifying key drivers for the $1.7 million increase in the 2027 Customer Communications forecast of $25.3 million as compared to 2024 recorded adjusted costs of $23.6 million. The $1.7 million net increase is driven by forecasted increases of $4.8 million, which are partially offset by forecast decreases of $3.1 million. Drivers of forecast increases include:

- $2.0 million increase in MWC EZ for dedicated bill support outreach, which includes additional outreach in the "shoulder months" to prepare customers for higher bills anticipated in the winter and summer months, support for data analytics to segment customers so that they receive more relevant outreach, and increasing information provided to customers about anticipated rate changes and how it may change their bills;
- $1.0 million increase in MWC EZ and $0.25 increase in MWC LJ to support customer awareness of local utility projects and their impacts. This includes helping customers prepare for impacts to service and traffic as well as to provide local on-site representatives to provide information and answer questions ($1.0 million). It also includes producing 75-100 short videos annually to communicate why local projects are needed and how it benefits customers and communities ($0.25 million);
- $0.8 million increase in MWC LJ to augment regional staff who engage with traditional and multicultural media outlets, as well as a variety of social media platforms, to provide updates on programs and services, utility upgrades, emergency preparation and outage restoration work and other topics that are critical for customer awareness and action.;
- $0.5 million increase for labor escalation in MWCs EZ, LI, and LJ associated with Customer Communications staff; and
- $0.25 million increase in MWC LJ to conduct messaging testing research on rates, bill support, and other critical topics to ensure our customer-facing messaging is clear and helpful.

These forecast increases are partially offset by $3.1 million in forecast decreases, including:

- $2.0 million decrease in MWC IG due to reduced spending necessary to ensure customers are aware of wildfire and PSPS preparedness strategies;
- $0.6 million decrease in MWC LI due to due to cost efficiencies and reductions achieved in digital publishing, translations, Salesforce licenses and internal events; and
- $0.5 million decrease in MWC EZ due to an expected reduction in regulatory filings requiring legal notice via inserts and advertising.

FIGURE 4-1
EXPENSE WALK 2024-2027
(THOUSANDS OF NOMINAL DOLLARS)



B. Customer Communications Forecast

This section describes the expense forecast for Customer Communications activities, which includes Customer Outreach and Communications (MWC EZ), Wildfire and PSPS Customer Safety Communications (MWC IG), Traditional Customer Safety Communications (MWC LB), External Communications (MWC LJ), Internal Communications (MWC LI), and Miscellaneous Communications Support (MWC FA). PG&E discusses these activities, the need for the work and customer benefits, and the drivers of the 2027 forecast in further detail below.

1. Customer Outreach and Communications (MWC EZ)

a. Overview

Customer Outreach and Communications includes costs associated with providing the following information to customers:

- Printed notices of planned regulatory filings achieved via bill inserts and public notices in the media and through digital forms. This work equips customers to learn about ratemaking procedures that may impact their energy costs, including how to participate in these proceedings, and to what extent their bills may be impacted. It also increases visibility into the work PG&E does to deliver a more resilient energy system using funds collected through customer rates; and
- Collateral supporting energy cost management achieved through on-bill and bill insert materials and welcome kits for new customers and digital outreach. This work provides customers visibility into the components that make up their bill, tangible ways for customers to monitor and lower their energy usage and costs, and programs to help them manage or automate bill alerts and payments, and how to contact PG&E for support.

b. Costs and Forecast

Table 4-2 below identifies the historical (2020-2024) and forecast (2025-2027) costs for Customer Outreach and Communications activities in MWC EZ. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $2.6 million

increase from 2024 recorded costs, and the customer benefits associated with the forecasted work.

TABLE 4-2
CUSTOMER OUTREACH AND COMMUNICATIONS
HISTORICAL AND FORECAST EXPENSE – MWC EZ
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	$3,129	$2,484	$2,912	$3,034	$3,974	$3,484	$3,516	$6,565
2	Total	$3,129	$2,484	$2,912	$3,034	$3,974	$3,484	$3,516	$6,565

PG&E's 2027 forecast for Customer Outreach and Communications activities is $6.6 million, which is $2.6 million higher than 2024 recorded costs of $4.0 million. PG&E developed its 2027 forecast with 2024 recorded costs as a starting point because recorded costs for these activities have increased since 2021 and 2024 recorded costs better reflect the increased level of communications and outreach conducted to customers regarding their bills and anticipated changes.

PG&E's forecasts an increase of $2.6 million for Customer Outreach and Communications activities in 2027 which is driven by planned increases in outreach and communications for dedicated bill outreach ($2.0 million), increased local utility project outreach ($1.0 million), which are partially offset by a forecasted reduction in regulatory filings requiring legal notices.

2. Wildfire and PSPS Customer Safety Communications (MWC IG)

a. Overview

Wildfire risk exists throughout PG&E's service area, with more than 50 percent of PG&E customers residing in high-fire threat areas. As such, PG&E customers need to understand and prepare for wildfires and PSPS events. PG&E developed a Wildfire and PSPS Customer Safety Communications Program to build understanding, raise awareness, and convey to its customers what they can do to keep themselves safe. To ensure customers are prepared for wildfire season

and potential PSPS events, PG&E utilizes both paid advertising and direct-to-customer communications.

1) Paid Advertising

The paid advertising program uses multiple channels: television, radio, print, video, digital and social media to educate customers on the impact of a PSPS event to their electric service, why it is important, how they can prepare and actions they need to take, and where they can find more information. These paid advertisements are the most effective method to communicate with customers throughout PG&E's service territory, while concentrating efforts to reach customers who live in high-fire threat areas. This educational content typically runs to align with the wildfire season and associated PSPS events. Messages focus on preparation from April through August and then pivots to PSPS event-specific messages through the end of the wildfire season—with an emphasis on customers in impacted areas.

2) Direct-to-Customer Communications

To assist in driving awareness of PG&E's emergency preparedness, educating about available resources to aid customers and communities, and driving emergency planning preparedness, PG&E deployed multiple direct outreach campaigns to residential and non-residential customers, as well as community-based organizations. This outreach was conducted via direct mail, emails, guides, fact sheets, and other collateral encouraging account holders—particularly those in high-fire threat areas—to update contact information for emergency notifications, to certify critical medical conditions requiring additional support, and to prepare emergency plans to stay safe during PSPS events, with support from PG&E and local partnerships. These PSPS safety and preparedness campaigns included several touches per year across multiple channels and included messaging in multiple languages, large print, and Braille.

b. Costs and Forecast

Table 4-3 below identifies the historical (2020-2024) and forecast (2025-2027) costs for Wildfire and PSPS Customer Safety Communications activities in MWC IG. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $2.0 million decrease from 2024 recorded costs, and the customer benefits associated with the forecasted work.

TABLE 4-3
WILDFIRE AND PSPS CUSTOMER SAFETY COMMUNICATIONS
HISTORICAL AND FORECAST EXPENSE – MWC IG
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	IG	$19,049	$14,941	$9,439	$9,426	$8,271	$6,297	$6,179	$6,293
2	Total	$19,049	$14,941	$9,439	$9,426	$8,271	$6,297	$6,179	$6,293

PG&E's 2027 forecast for Wildfire and PSPS Customer Safety Communications activities is $6.3 million, which is $2.0 million lower than 2024 recorded costs. PG&E developed its 2027 forecast with 2024 recorded costs as a starting point because costs for Wildfire and PSPS Customer Safety Communications have decreased year-over-year since 2020. This is because initial campaigns needed to build broad awareness of wildfire and PSPS preparedness, which were not well understood by customers at the time. Since 2020, customers have become more familiar with wildfire and PSPS. As a result, PG&E has shifted to more of a "reminder" based campaign which requires less frequent and more targeted outreach. For this reason, 2024 recorded costs provide the most accurate starting point to forecast 2027 costs for these activities.

Based on PG&E's expectation that it can continue to maintain strong awareness of wildfire and PSPS through a reminder-based approach, PG&E proposes a $2.0 million reduction in 2027 expense for Wildfire and PSPS Customer Safety Communications, relative to 2024 recorded costs..

3. Traditional Customer Safety Communications (MWC LB)

a. Overview

Traditional Customer Safety Communications promotes year-round public safety with mass reach and targeted seasonal messages. The objective is to promote public safety by: (1) raising customer awareness of potential hazards around electric and gas infrastructure; and (2) helping customers understand what actions they can take to keep themselves and their communities safe. PG&E provides important safety information to customers clearly, consistently, and cost-effectively. Paid advertising is an efficient and effective way to reach a wide range of the 16 million Californians who live in PG&E's service area.

PG&E's goal is to consistently deliver practical, actionable safety messages to help customers stay safe around gas and electric equipment and commodities. Short and simple messages explain what customers need to do in common situations like when they see a downed powerline or smell gas. PG&E also provides important safety messaging on calling 811 before digging to avoid hitting lines, preparing for emergencies and outages, and maintaining personal safety protocols around hydroelectric dams in recreation areas.

PG&E's media outreach includes a combination of television, radio, print, video, social media, and digital safety advertising in six designated market areas, targeting demographic populations and alternating seasonal messages. PG&E also uses search engine marketing so that customers seeking guidance can easily find this information.

To reflect the geographic and demographic diversity of PG&E's service area, messaging is delivered in multiple languages, as well as targeted to specific communities such as military veterans, communities of color, Access and Functional Needs customers, and other diverse communities.

PG&E has conducted advertising effectiveness customer research for more than a decade to determine the effectiveness of advertising safety messages. Through this channel, customers have told PG&E they want to hear messages about how to stay safe and to understand

what PG&E is doing to promote public safety. These communications are a critical tool to help customers take action and be prepared to keep their families and communities safe around gas and electric service and equipment.

b. Costs and Forecast

Table 4-4 below identifies the historical (2020-2024) and forecast (2025-2027) costs for Traditional Customer Safety Communications activities in MWC LB.

TABLE 4-4
TRADITIONAL CUSTOMER SAFETY COMMUNICATIONS
HISTORICAL AND FORECAST EXPENSE – MWC LB
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	LB	–	$3,575	$4,071	$4,070	$4,284	$4,188	$4,184	$4,212
2	Total	–	$3,575	$4,071	$4,070	$4,284	$4,188	$4,184	$4,212

PG&E's 2027 forecast for Traditional Customer Safety Communications activities is $4.2 million, which is essentially unchanged from 2024 recorded costs of $4.3 million. PG&E developed its 2027 forecast with 2024 recorded costs as a starting point because costs for Traditional Customer Safety Communications activities have remained relatively flat in recent years and 2024 reflects the most recent year of costs required to support this work. PG&E forecasts no change in the costs needed to support Traditional Customer Safety Communications in this GRC.

4. External Communications (MWC LJ)

a. Overview

External Communications provides relevant and timely outreach to customers and media on many important aspects of PG&E's services and projects, communicates public safety information, and provides updates in emergency situations. For example, the team notifies customers of utility work in their area, increases general awareness of gas and electric system safety and reliability practices, performs

community-oriented local outreach focusing on general safety education, and provides compliance bill inserts and notifications to customers and the public for awareness of CPUC-mandated programs. In addition, the team communicates the status of PSPS information to customers through a variety of communications channels, including news releases, press conferences, interviews, paid advertising, and social media. External Communications is also responsible for media outreach as a method to keep customers and the public informed about their PG&E service and critical safety issues, especially during an emergency.

b. Costs and Forecast

Table 4-5 below identifies the historical (2020-2024) and forecast (2025-2027) costs for External Communications activities in MWC LJ. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $1.7 million increase from 2024 recorded costs, and the customer benefits associated with the forecasted work.

TABLE 4-5
EXTERNAL COMMUNICATIONS
HISTORICAL AND FORECAST EXPENSE – MWC LJ
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	LJ	$5,523	$5,967	$5,591	$5,363	$4,900	$5,127	$5,299	$6,616
2	Total	$5,523	$5,967	$5,591	$5,363	$4,900	$5,127	$5,299	$6,616

PG&E's 2027 forecast for External Communications activities is $6.6 million, which is $1.7 million higher than 2024 recorded costs of $4.9 million. PG&E developed its 2027 forecast with 2024 recorded costs as a starting point because 2024 recorded costs reflect the most recent headcount for External Communications, which has decreased in recent years due to attrition and team changes.

The primary driver of the $1.7 million increase for External Communications activities is PG&E's forecasted increase of $0.8 million to augment regional External Communications staff who engage with

traditional and multicultural media outlets, as well as a variety of social media platforms, to provide updates on programs and services, utility upgrades, emergency preparation and outage restoration work, and other topics that are critical for customer awareness and action. PG&E estimates an additional cost of $0.8 million for four FTEs.

Additional staff is needed because PG&E currently has seven full-time staff specifically engaged in this work, each covering an average of 10,000 miles of PG&E's service area. In 2024, PG&E's news monitoring service captured more than 12,000 published or broadcasted stories involving PG&E. PG&E's forecast will allow our media representatives to deepen their engagement with key media stakeholders, improving the quality of information provided on the above topics for customers' benefit.

5. Internal Communications (MWC LI)

a. Overview

Internal Communications works to keep PG&E employees informed of policies and programs that impact PG&E's customers. PG&E uses email, print publications, intranet sites, scheduled conference calls, virtual and in-person meetings, and other means of communication to ensure that employees have a greater understanding of Company goals, leadership and organization updates, emerging issues, and how to work safely and efficiently in a robust speak-up culture while serving customers.

b. Costs and Forecast

Table 4-6 below identifies the historical (2020-2024) and forecast (2025-2027) costs for Internal Communications activities in MWC LI. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $0.6 million decrease from 2024 recorded costs, and the customer benefits associated with the forecasted work.

TABLE 4-6
INTERNAL COMMUNICATIONS
HISTORICAL AND FORECAST EXPENSE – MWC LI
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	LI	$1,435	$936	$997	$2,233	$1,964	$1,374	$1,375	$1,381
2	Total	$1,435	$936	$997	$2,233	$1,964	$1,374	$1,375	$1,381

PG&E's 2027 forecast for Internal Communications activities is $1.4 million, which is $0.6 million lower than 2024 recorded costs of $2.0 million. PG&E developed its 2027 forecast with 2024 recorded costs as a starting point because 2024 recorded costs represent the most recent year of recorded actual costs. PG&E's 2027 forecast of $1.4 million includes a $0.6 million reduction relative to 2024 recorded costs due to cost efficiencies and reductions achieved in digital publishing, translations, Salesforce licenses, and internal events.

6. Miscellaneous Communications Support (MWC FA)

a. Overview

Miscellaneous Communications Support includes costs to provide above-the-line advertising support for activities such as legally required bill inserts and to raise customer awareness of public purpose programs, pricing, products, service options, and other customer programs.

b. Costs and Forecast

Table 4-7 below identifies the historical (2020-2024) and forecast (2025-2027) costs for Miscellaneous Communications Support activities in MWC FA. PG&E's 2027 forecast for MWC FA activities is $0.20 million, which is based on PG&E's 2024 recorded costs of $0.17 million. The slight increase in the 2027 forecast is attributable to labor escalation. For more information on labor escalation, please refer to Exhibit (PG&E-8), Chapter 3.

TABLE 4-7
MISCELLANEOUS COMMUNICATIONS SUPPORT
HISTORICAL AND FORECAST EXPENSE – MWC FA
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	FA	–	$104	$84	$86	$170	$184	$191	$198
2	Total	–	$104	$84	$86	$170	$184	$191	$198

C. Conclusion

Based on the evidence discussed above and the associated workpapers, PG&E requests that the Commission grant the requests presented in this chapter.

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 5

CUSTOMER SERVICE

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 5
CUSTOMER SERVICE

TABLE OF CONTENTS

A. Introduction and Summary 5-1
1. Overview 5-1
2. Summary of Request 5-2
B. Customer Service Forecast 5-2
1. Customer Insights and Strategy (MWC EZ) 5-2
a. Overview 5-2
b. Customer Insights and Strategy Forecast 5-3
2. Contact Center Operations (MWC DK, MWC EZ, MWC IS) 5-6
a. Overview 5-6
b. Contact Center Operations Forecast 5-7
3. Customer Service Outreach (MWC DK, MWC EZ, MWC IU) 5-9
a. Overview 5-9
b. Customer Service Outreach Forecast 5-10
4. Customer Technology Planning and Enablement (MWC EZ) 5-13
a. Overview 5-13
b. Customer Technology Planning and Enablement Forecast 5-14
5. Digital Strategy (MWC EZ) 5-16
a. Overview 5-16
b. Digital Strategy Forecast 5-17
C. Conclusion 5-18

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 5
CUSTOMER SERVICE

A. Introduction and Summary

1. Overview

This chapter demonstrates that Pacific Gas and Electric Company's (PG&E) 2027 expense forecast for management and operation of the following Customer Service operational areas is reasonable and should be approved:

- Customer Insights and Strategy drives strategic planning to improve customer satisfaction and value by gathering intelligence through research, data, and analytics. These insights help establish the customer experience strategic roadmap and inform actions across operational areas. The team also evaluates programs and tactics to ensure they benefit customers effectively.
- Contact Center Operations (CCO) provides timely and responsive support to PG&E's customers for emergencies, payment inquiries, technical questions, and energy-related services and programs. CCO also includes a Workforce Management (WFM) group that oversees forecasting, scheduling, timekeeping, and supervises the Interactive Voice Response (IVR), call routing and call volumes for PG&E's contact centers.
- Customer Service Outreach (CSO) conducts proactive outreach to PG&E's most vulnerable customers to help those in arrears enroll in bill assistance programs, increase enrollments in the Medical Baseline Program, and provide information to Access and Functional Needs (AFN) customers regarding Public Safety Power Shutoff (PSPS) and Enhanced Powerline Safety Settings (EPSS) notification processes and available resiliency programs.
- Customer Technology Planning and Enablement (CTP&E) defines technical strategies and business requirements for proposed technology solutions to deliver programs, products, and services for PG&E's customers. CTP&E leverages customer insights, end-user feedback,

and long-term strategies to prioritize PG&E's technology investments and inform the solutions implemented and their continuous improvement. Key initiatives include continued feature and functionality improvements for technology project solutions after they are launched. This team also supports GRC-funded projects supporting load management and decarbonization efforts related to electric vehicles, energy efficiency, and demand response programs.

- Digital Strategy is responsible for providing effective communication and self-service tools for customers by managing and improving PG&E's website, customer notifications, and mobile channels. Improvements are informed by usage analysis and customer satisfaction feedback which are regularly incorporated into updates.

This forecast for the Customer Service operational teams will enable PG&E to continue improving the level of service customers receive to better meet their needs and to provide customer support as described in this chapter.

2. Summary of Request

PG&E requests that the Commission adopt its 2027 expense forecast of $87.8 million in Table 5-1, below. Table 5-2 shows PG&E's recorded capital costs between 2020-2024 for Customer Service activities, and forecasts $0.1 million in 2025 but is not requesting authorization for a 2027-2030 forecast.

TABLE 5-1
CUSTOMER SERVICE
EXPENSE BY MWC
(THOUSAND OF NOMINAL DOLLARS)

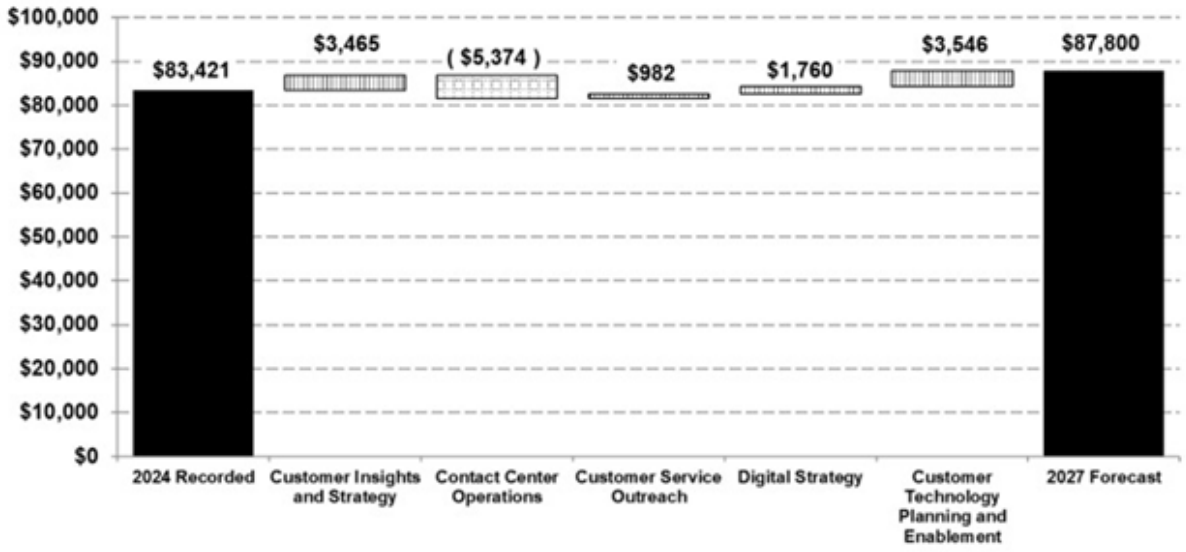
Line No.	MWC	Description	Recorded Adjusted 2020	2021	2022	2023	2024	Forecast 2025	2026	2027
1	DK	Manage Customer Inquiries	$59,898	$56,614	$57,672	$62,787	$63,735	$58,682	$50,373	$58,421
2	EZ	Manage Var Cust Care Processes	12,710	10,681	10,378	12,645	17,709	23,374	21,488	27,169
3	IS	Bill Customers	4	3	12	3	60	–	–	–
4	IU	Collect Revenue	7,660	4,084	2,620	1,364	1,804	2,080	2,039	2,210
5		Total	$80,273	$71,381	$70,769	$76,817	$83,421	$84,137	$73,900	$87,800

TABLE 5-2
CUSTOMER SERVICE
CAPITAL BY MWC
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted 2020	2021	2022	2023	2024	Forecast 2025	2026	2027	2028	2029	2030
1	21	Misc. Capital	$24	$(1)	–	–	$87	$75	–	–	–	–	–
2		Total	$24	$(1)	–	–	$87	$75	–	–	–	–	–

Figure 5-1 provides an expense walk identifying key drivers for the $4.4 million increase in the 2027 forecast ($87.8 million) compared to 2024 recorded costs of $83.4 million. Each driver is summarized below.

FIGURE 5-1
CUSTOMER SERVICE
EXPENSE WALK (2024-2027)
(THOUSAND OF NOMINAL DOLLARS)



- A $3.5 million increase in Customer Insights and Strategy costs for ongoing support associated with PG&E's customer transaction survey platform, speech analytics platform enhancements, increased benchmarking, analytical tools, and customer focus groups, and additional labor to analyze and coordinate recommendations from customer feedback, delivering increased customer satisfaction and value;
- A $3.5 million increase in Customer Technology Planning and Enablement costs and a $1.8 million increase in Digital Strategy costs to support ongoing management of implemented IT solutions. Specifically, the PGE.com Redesign and Contact Center Service Platform (CCSP) Projects authorized in the 2023 and 2020 GRCs[1] were built out using capital funds as described in Exhibit (PG&E-6), Chapter 11. As these

[1] The Contact Center Service Platform Project refers to the Contact Centers 2020 Project authorized by the Commission in PG&E's 2020 GRC.

projects mature during the 2027 GRC cycle, expense funds outlined and captured in this chapter will be necessary to maintain the systems and provide continuous functionality improvements based upon customer and internal end-user feedback;

- A $1.0 million increase in Customer Service Outreach costs which reflects forecasted attrition in 2026 and 2027 following increased staffing in 2025 to align with an agreement PG&E reached with IBEW 1245 in 2021 to permanently close its Customer Service Offices; and
- A $5.4 million decrease in Contact Center Operations costs which reflects forecasted efficiencies gained from the use of artificial intelligence (AI) in PG&E's interactive voice response (IVR); improved self-service supporting customers' ability to resolve inquiries following the launch of PG&E's redesigned website, which is forecasted to reduce call volume; and reduced handle time due to the implementation of CCSP.

PG&E discusses these activities in further detail in Section B.

B. Customer Service Forecast

This section describes the expense forecast for Customer Service activities, which include Customer Insights and Strategy, CCO, CSO, Customer Technology Planning and Enablement, and Digital Strategy.

1. Customer Insights and Strategy[2] (MWC EZ)

a. Overview

The Customer Insights and Strategy team continually improves PG&E customers' experiences by analyzing customer satisfaction, identifying areas for improvement, and working cross-functionally to implement solutions. Customer insights are gathered through various tactics. These include customer feedback, benchmarking, operational and digital analytics, segmentation, modeling, primary and secondary research, and advanced analytics. These capabilities are critical to ensuring the Company is prioritizing and effectively addressing

---

2 Customer Insights and Strategy was formerly known as Customer Experience and Insights and was included in Exhibit (PG&E-6), Ch. 8 in PG&E's 2023 GRC (A.21-06-021).

customer needs. Investment in customer insights and analytics yields data-informed and prioritized actions, efficiencies, accountability, and more effective coordinated solutions across functional areas. The following are examples from 2024 of customer insights driving experience improvements:

- Customer feedback revealed a need for better customer outage notifications, leading to implementation of a new communication platform and an enhanced Estimated Time of Restoration (ETOR) model;
- Call analytics and customer surveying showed customer frustration with navigation of the IVR, leading to a pilot project using generative AI voice technology; and
- Digital analytics and session replay technology on the website brought visibility to various issues and led to the deployment of fixes and enhancements.

b. Customer Insights and Strategy Forecast

Table 5-3 identifies the historical (2020-2024) and forecast (2025-2027) costs for Customer Insights and Strategy. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $3.5 million increase from 2024 recorded costs, and the customer benefits associated with the forecasted work.

TABLE 5-3
CUSTOMER SERVICE
HISTORICAL AND FORECAST COSTS – CUSTOMER INSIGHTS AND STRATEGY
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	$3,890	$4,090	$3,067	$3,227	$5,411	$6,197	$6,097	$8,876
2	Total	$3,890	$4,090	$3,067	$3,227	$5,411	$6,197	$6,097	$8,876

From 2020 to 2021, recorded costs for Customer Insights and Strategy increased by $0.2 million. This increase was due to expanded Enterprise requests for customer insights. These insights were used to inform decisions using a customer panel for ad-hoc surveying on

messaging or program effectiveness. Recorded costs for Customer Insights and Strategy activities decreased by $1.1 million from 2021 to 2022 due to the consolidation of research vendors. Recorded costs increased again from 2022 to 2023 by $0.2 million due to an initiative to understand and improve customer case creation and escalations across the company. This initiative resulted in a 9 percent year-over-year reduction in escalations due to the implementation of data-driven solutions. Lastly, recorded costs increased from 2023 to 2024 by $2.2 million due primarily to an internal reorganization moving the Process Improvement Team from Contact Center Operations to Customer Insights and Strategy. This process improvement team implements new programs within the contact center and reviews call handling processes to increase customer satisfaction while decreasing handle time.

PG&E forecasts $8.9 million in 2027 for Customer Insights and Strategy activities, which represents an increase of $3.5 million from 2024 recorded adjusted costs of $5.4 million. PG&E developed its 2027 forecast for Customer Insights and Strategy based on 2024 recorded costs, which reflect the recent internal reorganization that moved PG&E's Process Improvement team from Contact Center Operations to the Customer Insights and Strategy team. PG&E then forecast costs necessary to expand capabilities and technology to improve customer satisfaction and inform the design of customer experiences that support our commitments to decarbonization. The primary drivers of the $3.5 million increase are the following:

- $1.0 million for the transactional survey platform. This spend is included in Exhibit (PG&E-6), Chapter 5, as previous capital spend under Customer and Enterprise Solutions Technology used to build the platform. It has now changed to expense spend for subscription, maintenance, program support, and expansion. The transactional survey platform is integrated with PG&E systems for real-time surveying. It currently ingests over 500,000 customer survey responses a year and is equipped with analytical capabilities and feedback management tools. The feedback is used by thousands of

coworkers across the enterprise to prioritize improvements utilizing the information received from customers about their needs and how we can best serve them in real-time. The incremental cost accounts for the shift from implementation (Capital) to ongoing maintenance and support (Expense) and for the expansion of the areas surveyed through the platform such as programs, case completion, field work, etc;

- $1.4 million for enhanced contact center call speech analytics integrated with PG&E's transactional survey platform. The platform ingests call recordings and uses speech analytics for tagging, summarizing, sentiment analysis, and quality assurance. The platform also enables agent coaching and performance management with advanced analytics for actionable insights. The unique integration of speech analytics with transactional surveys allows for a comprehensive view of customer satisfaction and contact center performance, offering advanced analytics that are not available in standalone solutions. The platform is expected to drive benefits such as improved first contact resolution, agent performance, and customer experience;
- $0.6 million for enhanced customer insights through industry benchmarking and best practice research, enhanced data feeds and analytical capabilities, and ancillary customer research tools such as customer panels and usability testing capabilities; and
- $0.5 million for 3 FTEs to support analytics and to act on issues derived from the customer transactional survey and speech analytics daily reporting.

Overall, the growth and enhancement of capabilities within the Customer Insights and Strategy team has demonstrated the effectiveness of data driven prioritization and customer-informed design. The investment in the technological, analytical, and research capabilities will return benefits for the company through measurably improved customer experience, efficiencies, and customer-focused design.

2. Contact Center Operations (MWC DK, MWC EZ, MWC IS)

a. Overview

Contact Center Operations (CCO) responds to customer calls using a combination of live agents, or Customer Service Representatives (CSRs) and automated systems that use IVR technology. CCO employs 856 CSRs (based on 2024 average monthly CSR headcount),[3] who work in contact centers located in Fresno and Sacramento and can assist customers in 262 languages.[4] These representatives address customer inquiries, schedule service orders, and help customers understand and navigate the many customer assistance programs that are available.

Contact Center Operations employees respond to approximately 6.2 million customer phone inquiries annually for service, information, and assistance.[5] CCO also responds to customer e-mails received through PG&E's website. The ability to respond to inquiries in a timely manner is key to PG&E's commitment to make public safety and affordability top priorities and to meet the overall service needs of its customers.[6] Examples of common customer interaction topics include:

- Start service;
- Stop or transfer service;
- Make payments;
- Make pay plans;
- Report an outage;
- Inquire about billing or rates; and
- Inquire about services or programs.

CCO and WFM also manage the IVR, which is the automated voice system. PG&E's IVR handled 12 million calls in 2024, which is a major

---

3 Exhibit (PG&E-6), WP 5-8, line 5.

4 Exhibit (PG&E-6), WP 5-11, for a list of available languages from Language Line Services.

5 Based on an average of 2023-2024 handled calls. See Exhibit (PG&E-6), WP 5-6, for additional contact center call statistics.

6 Exhibit (PG&E-6), WP 5-7, for more information on CCO telephone service levels by year.

benefit to customers as the cost per handled call is much less expensive in the automated channel.[7] Artificial Intelligence has been introduced to the automated IVR and is becoming increasingly important in improving the self-service capabilities.

b. Contact Center Operations Forecast

Table 5-4 identifies the historical (2020-2024) and forecast (2025-2027) expense costs for Contact Center Operations. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $5.4 million decrease from 2024 recorded costs, and the customer benefits associated with the forecasted work.

TABLE 5-4
CUSTOMER SERVICE
SUMMARY OF EXPENSE – CONTACT CENTER OPERATIONS
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	DK	$58,992	$56,188	$57,472	$62,787	$63,735	$58,682	$50,373	$58,421
2	EZ	54	2	51	(12)	–	–	–	–
3	IS	4	3	12	3	60	–	–	–
4	Total	$59,050	$56,193	$57,623	$62,797	$63,795	$58,682	$50,373	$58,421

PG&E developed its Contact Center Operations forecast starting from 2024 recorded costs and reduced these costs to account for forecasted efficiencies which are discussed further below. PG&E used 2024 recorded costs as the starting point for its 2027 forecast because recorded costs prior to 2023 were lower than normal due to decreased call volume during the moratorium on disconnections implemented during the pandemic. In addition, 2024 recorded costs reflect staffing increases made to accommodate PG&E's expectation that call volume may temporarily increase following the release of the redesigned pge.com website and that there may be a temporary increase in call handle time as CSRs develop familiarity with the new Contact Center Service Platform. Also, 2024 recorded costs reflect cost reductions

[7] Exhibit (PG&E-6), WP 5-6, line 13.

associated with a re-organization that moved a process improvement team from CCO to Customer Insights and Strategy.

The $5.4 million decrease in PG&E's 2027 CCO forecast is largely attributable to expected efficiencies of $1.7 million gained by the implementation of artificial intelligence (AI) enhancements in the IVR, $1.7 million associated with efficiencies from the implementation of the Contact Center Service Platform, $1.5 million tied to improved self-service and expected call reduction of 137,900 annually from the PGE.com redesign project, and $0.5 associated with natural attrition due to these efficiencies.[8]

PG&E developed its forecasted decrease of $1.7 million in 2027 associated with AI enhancements in the IVR based on its estimate that these enhancements will result in a 156,200 (2.6 percent) reduction in live-call volume yearly as customers are able to increasingly use AI solutions to assist with less-complex inquiries, such as receiving outage information and learning about programs offered by PG&E, obtaining current bill amounts, and finding ways to pay their bill. While we do expect live agent call volumes to decrease as AI more intelligently replaces our current IVR system, PG&E anticipates longer handle times associated with live agent calls as more of the calls that come through will likely be more complex. Artificial Intelligence will allow us a decrease in volume of calls to allocate more time to meaningful conversations with customers. We expect this to increase customer satisfaction while still working towards greater affordability with less spend.

The $1.7 million savings associated with CSR ease of use due to the implementation of the new Contact Center Service Platform was calculated assuming a 5 second reduction in handle time per call.

In addition, PG&E developed its forecasted decrease of $1.5 million associated with improved self-service attributed to PGE.com's redesign

---

8 Forecasted yearly cost savings associated with implementing the AI enhancements in the IVR and PGE.com implementation derived from reduction in live agent calls per program using the 2024 call data for cost per call average of $10.88 [see Exhibit (PG&E-6), WP 5-10, line 12] and 5,939,288 total CSR-handled calls in 2024 [see Exhibit (PG&E-6), WP 5-6, line 43].

by assessing the expected number of decreased live calls into the contact center (137,868 [2.3 percent] estimated in 2027) and multiplying them by the average cost per call ($10.88 in 2024). For example, with the PGE.com redesign, PG&E has improved password reset options to include a text message, phone call, or email to the customer. Today, email reset is the only option and the customer must type in a complicated password. If they are unsuccessful, the customer will likely call PG&E for assistance. The new email password reset process will contain a secure, clickable link, likely to circumvent a phone call. PG&E has also created the ability for customers to start service online if they have solar, whereas today, calling to start service is the only option.

The remaining $0.5 million in decreased spend is expected to come from natural employee attrition, as efficiencies gained through the avenues explained above will provide.

3. Customer Service Outreach (MWC DK, MWC EZ, MWC IU)

a. Overview

PG&E closed all 65 of its Customer Service Offices in March 2020 in response to the COVID-19 pandemic. Following that decision, PG&E observed that stay at home orders increased customer energy usage and unpaid bills due to employment impacts. In many cases, customers who did not need help paying their bills prior to the pandemic were in need of bill assistance programs for the first time. It became clear that customers required help. The assistance needed ranged from navigating the programs and rate options to help customers catch up on their past due bills, discussing ways to make energy more affordable, making on time payments more achievable, and ensuring customers exhausted all available options to minimize disconnections.

To address these concerns, PG&E re-imagined its entire Customer Service Office workforce to support customer affordability by proactively calling customers in arrears to help them reduce their past due balances and better manage their bills. These calls are inclusive, engaging both English-speaking customers as well as non-English speakers using live support provided by PG&E’s third-party live translation services.

PG&E'S language options can help explain important information to customers in 262 languages. Assistance provided to customers included processing rate changes and enrolling customers in programs such as California Alternate Rates for Energy (CARE), Family Electric Rate Assistance (FERA), the Arrearage Management Plan (AMP), and Medical Baseline Program. It also included helping customers access financial assistance through programs such as the Low-Income Home Energy Assistance Program (LIHEAP) and federal and state COVID relief programs such as the Emergency Rental Assistance Program.

On April 28, 2022, PG&E filed the Customer Service Office Closure and Transformation Application (A.) 22-04-016, requesting to permanently close its local offices and transition its employees' scope of work to focus on targeted outreach to low income, AFN, and other vulnerable customers. The Commission approved PG&E's request to permanently close its Customer Service Offices in D.22-12-033. As such, CSO, which used to stand for Customer Service Offices, was transformed permanently into Customer Service Outreach.

In addition to helping customers gain utility solvency and lower monthly bills, Customer Service Outreach has helped to increase the number of customers that self-identify as Access and Functional Needs (AFN), which results in these customers receiving additional wildfire, PSPS, and other emergency awareness outreach.

CSO also maintains Neighborhood Payment Centers (NPCs), which are a network of locations throughout the service area where customers are able to make in-person payments, free of charge. These locations are managed by a third-party vendor to facilitate and manage banking and contracts.

b. Customer Service Outreach Forecast

Table 5-5 identifies the historical (2020-2024) and forecast (2025-2027) expense costs for CSO. CSO costs varied between 2020-2024 for several reasons:

- CSO costs decreased by $9.0 million from 2020 to 2022 due to PG&E's decision to not backfill staffing while its local offices were closed during the COVID-19 pandemic;

- CSO costs increased by $3.2 million in 2023 as PG&E increased staffing to transition to the new Customer Service Outreach model approved in D.22-12-033; and
- CSO costs increased by $1.0 million in 2024, primarily due to increased contract costs with PG&E's vendor that manages its network of 519 Neighborhood Payment Centers (NPC).[9]

TABLE 5-5
CUSTOMER SERVICE
HISTORICAL AND FORECAST EXPENSE – CUSTOMER SERVICE OUTREACH
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	DK	$906	$426	$200	–	–	–	–	–
2	EZ	4,949	2,286	1,686	$6,344	$7,015	$10,091	$8,228	$7,591
3	IU	7,660	4,084	2,620	1,364	1,804	2,080	2,039	2,210
4	Total	$13,515	$6,795	$4,506	$7,708	$8,819	$12,171	$10,267	$9,801

PG&E's 2027 CSO forecast of $9.8 million represents an increase of $1.0 million from 2024 recorded costs. PG&E developed its 2027 forecast based on its plan to increase CSO staffing from 2023 to 2025 in accordance with an agreement reached with IBEW 1245 as part of the permanent closure of PG&E's local offices. At the end of this agreement, PG&E plans to manage its CSO workforce through attrition, which is reflected in decreased staffing costs in 2026 and 2027.

Continued funding of PG&E's CSO team is necessary to support the delivery of high-quality customer service that improves customer affordability and safety. This includes decreasing customer arrearages; increasing enrollments in the Medical Baseline Program, which may help reduce customer bills for customers with eligible medical conditions; and increasing the number of self-identified vulnerable customers to support safety related outreach. In the first two years of implementation following Commission approval (2023 and 2024), PG&E

[9] Neighborhood Payment Centers are owned and operated by third parties and are authorized to collect and process in-person payments. Number reflects 2024 active NPC locations.

has seen increases in the number of customers benefiting from CSO through phone outreach and attendance at community outreach events. For instance, CSO employees enrolled 12,095 customers in CARE in 2024 compared to 8,891 in 2023. In addition, CSO employees enrolled 6,408 customers in the AMP Program in 2024 compared to 5,628 in 2023.

Other targeted outreach efforts focused on PG&E's most vulnerable customers and included proactive touchpoints with customers in arrears to help them make consistent and on time bill assistance more achievable. These efforts helped customers make over one million total payments in 2024, totaling over $568 million compared to $540 million in 2023.[10] In addition, PG&E's CSO data confirms that the number of in-person payments at NPCs made by customers who exclusively paid their bills at a CSO prior to closure decreased from 2023 to 2024, including for CARE customers.[11] These data illustrate that customers who previously made payments exclusively at a local office are migrating to payment channels that are not in-person and that CSOs are no longer necessary for them to pay their bills. Lastly, the population of customers who exclusively used a CSO to make a payment in the 12 months prior to CSO closure in March 2020, only 1.6 percent made zero payments in 2024 compared to 16.7 percent of the general residential customer population not exclusive to CSO.[12]

---

10 The total number of payments were made across various channels and also included payments from LIHEAP and REACH. PG&E Customer Service Office Transformation Annual Report for the Period of January 1, 2024-December 31, 2024 (2024 CSO Annual Report), p. 6. See also PG&E Customer Service Office Transformation Annual Report for the Period of January 1, 2023-December 31, 2023 (2023 CSO Annual Report), p. 7.

11 CSO exclusive customers made 210,669 payments at a NPC in 2023 compared to 199,912 payments at a NPC in 2024. The number of payments made by CSO exclusive CARE customers also decreased from 127,895 in 2023 to 122,073. For more information, see the 2023 CSO Annual Report at p. 7 and 2024 CSO Annual Report at p. 6.

12 2024 CSO Annual Report, p. 8.

4. Customer Technology Planning and Enablement (MWC EZ)

a. Overview

Customer Technology Planning and Enablement (CTP&E) is a centralized technology strategy and deployment team driving and supporting the C&ES functional area's technology needs to improve customer outcomes and to enable customer support teams to serve PG&E's customers. This team is responsible for co-developing technology roadmaps with Enterprise Architecture, leading and coordinating IT implementations, and delivering application enhancements on critical C&ES platforms.[13] Customer Technology Planning and Enablement provides project sponsorship as well as technology asset and data governance to many key initiatives within Customer Experience.

The team is charged with co-managing PG&E's annual IT prioritization process for C&ES to ensure critical regulatory, safety, and strategic initiatives are prioritized.[14] This team also oversees minor IT enhancement backlogs and facilitates new requests that arise throughout the year. In partnership with Customer Insights and Strategy, this team ensures the efficient and timely delivery of technological solutions that meet customer expectations.

Corporate initiatives related to IT systems affecting C&ES are also centrally supported within this team. One such initiative is around maturing the C&ES data management and governance processes which captures critical datasets through a secure and automated process to ensure appropriate mitigations are incorporated.

Another corporate initiative championed by this team involves it's shift to Scaled Agile Framework implementation methodology for IT projects which aims to develop products in smaller batches that can be released to operations more frequently than what have historically been waterfall releases when an entire project is launched all at once.

---

13 An example of this is our Energy Insights platform within Salesforce, which is used by several different Customer Care areas including Enterprise Account Management and Pricing Products.

14 For more information, see Exhibit (PG&E-7), Ch. 7.

The Customer Technology Planning and Enablement team is responsible for keeping up with technological changes as they benefit customers. For example, improvements made to the customer call center platform that allows for a faster response and speed to resolution with customers. By 2030, it is anticipated that technology will significantly impact business processes in various ways including:[15]

- Using automation and Artificial Intelligence integration to respond directly to customers or address internal customer inquiries;
- Virtual reality or augmented reality for internal trainings;
- Continued increase in internet of things and connected devices that help customers manage their energy consumption; and
- Personalization of services to the customer through communications and program suggestions.

This team works closely with the Customer Insights and Strategy organization to understand research and customer interests and bring them to life through technology.

b. Customer Technology Planning and Enablement Forecast

Table 5-6 identifies the historical (2020-2024) and forecast (2025-2027) costs for Customer Technology Planning and Enablement. In the section below, PG&E describes its methodology for determining its 2027 forecast and explains variances between historical and forecast costs for Customer Technology activities, including key drivers of decreases or increases between 2024 recorded adjusted costs and 2027 forecast costs.

---

15 PricewaterhouseCoopers (PwC), Sizing the prize, PwC's Global Artificial Intelligence Study: Exploiting the AI Revolution, What's the real value of AI for your business and how can you capitalize?, available at: https://www.pwc.com/gx/en/issues/artificial-intelligence/publications/artificial-intelligence-study.html#:~:text=Our%20research%20also%20shows%20that,attractiveness%20and%20affordability%20over%20time (accessed April 19, 2025).

TABLE 5-6
CUSTOMER SERVICE
HISTORICAL AND FORECAST COSTS – CUSTOMER TECHNOLOGY PLANNING ENABLEMENT
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	$576	$1,303	$1,252	$504	$1,086	$1,521	$1,711	$4,632
2	Total	$576	$1,303	$1,252	$504	$1,086	$1,521	$1,711	$4,632

Historical variations in Customer Technology costs are driven by internal budgeting which results in the team's costs being charged either to a specific IT project or to its own assigned budget. For example, Customer Technology costs increased to $1.3 million in 2021 and 2022 because the team's support for CCSP could not be charged to the project in these years. Recorded costs decreased by $0.7 million in 2023 due to higher costs being charged out to continued development of CCSP. From 2023 to 2024, recorded costs increased by $0.6 million due to increased support needed for billing system enhancements driven by implementation of new rate products. Collectively, this work has been done by the same team of employees, but work has been charged to different places.

PG&E forecasts $4.6 million in 2027 for Customer Technology services and improvements, which represents an increase of $3.5 million from 2024 recorded adjusted costs of $1.1 million. PG&E's 2027 Customer Technology forecast is based on the need for eight incremental FTEs ($1.1 million) to continue the maintenance and functionality improvements for technology that has now been moved into operations including Contact Center Service Platform and PGE.com. The remaining staff currently capitalized on major projects will shift to run and improve the technology implemented.

The request to increase the spending in this area reflects the fact that some systems which are being updated now through capital projects will be moved to operations but receive ongoing feature and functionality improvements to continue meeting customer interests. This working model reflects PG&E's continued investment in meeting customer needs and working through the Lean Operating model to drive

technology in a way that goes from run and maintain to run and improve to benefit the customer experience and customer needs. This work is expense-based because it is anticipated to be smaller than the Agile threshold of $500,000 per release for capitalization.

5. Digital Strategy (MWC EZ)

a. Overview

Digital Strategy provides expertise in copywriting, project management, digital communication strategy, web design, optimization testing, and content publishing. Team members are also responsible for web analytics, online feedback, future functionality, and day-to-day oversight of self-service features. The team also sets the governance approach for all customer facing digital properties to ensure compliance with legal obligations such as ADA accessibility, which provides guidelines for how to make digital experiences accessible to those with vision, hearing, mobility, or cognitive support needs. The team works to ensure that PG&E's notifications platforms are compliant with state and federal telemarketing and privacy laws. Digital Strategy manages six core digital systems and platforms:

- **PGE.com Website** – A core digital asset, PGE.com provides customers with information on safety, outages, pricing, service options, and demand side management programs including energy efficiency. In 2024, PG&E websites, including Your Account and the Outage Center, [16] received more than 127 million site visits and handled almost 75 million transactions;
- **Your Account** – "Your Account" is the logged in, transaction area of PG&E's website. It provides customers with a variety of digital self-service options, such as account billing and payment options, alerts and notifications, energy usage and diagnostics, rate comparisons and user profile management;
- **Emergency and Outage Communications** – Digital Strategy, as part of PG&E's core web properties, also manages and maintains a website dedicated to safety and alerts for customers which includes

[16] This includes all domains (pge.com, mobile site, and Emergency Web).

the Outage Center. This site is hosted by outside vendors and was designed for scalability and resiliency if PGE.com is not available due to a major event. It is a standalone system designed for speed and flexibility in publishing;

- **Notifications** – The Digital Strategy team also oversees platforms used to notify customers via text, email, and phone. These platforms are used for everyday outages and alerts around usage, as well as during emergency situations such as Public Safety Power Shutoffs (PSPS);
- **Chatbot** – PG&E began piloting a chatbot in 2024 to identify if the bot could successfully answer questions for customers. In 2025, the bot's capabilities will be expanded to perform select functions for the user. The goal of the bot is to assist customers with questions or transactions at a lower cost than the call center; and
- **Report It Mobile App** – PG&E currently offers a mobile app where customers can take pictures of potential safety issues to submit them to PG&E for review. While the app has been well received by the customers that use it, many customers have asked for it to be available as a web page so they don't have to download the app to their phone. Accordingly, PG&E plans to build the Report It functionality as a web page in 2025.

b. Digital Strategy Forecast

Table 5-7 identifies the historical (2020-2024) and forecast (2025-2027) expense costs for Digital Strategy. In the section below, PG&E describes its methodology for determining its 2027 forecast and explains variances between historical and forecast costs for Digital Strategy activities, including key drivers of decreases or increases between 2024 recorded adjusted costs and 2027 forecast costs.

TABLE 5-7
CUSTOMER SERVICE
HISTORICAL AND FORECAST COSTS – DIGITAL STRATEGY
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	$3,242	$2,999	$4,411	$2,601	$4,310	$5,564	$5,453	$6,070
2	Total	$3,242	$2,999	$4,411	$2,601	$4,310	$5,564	$5,453	$6,070

PG&E forecasts $6.1 million in 2027 for Digital Strategy activities, which represents an increase of $1.8 million from 2024 recorded costs of $4.3 million. Since 2020, recorded costs for Digital Strategy activities have varied primarily due to charge outs to the PGE.com redesign project. PG&E developed its 2027 forecast for Digital Strategy activities using 2024 recorded costs as a starting point because it reflects the most recent year of costs as the PGE.com redesign project transitions primarily from building the site (capital) to ongoing operations and maintenance (expense).

Accordingly, $1.1 million of the forecasted increase in Digital Strategy activities is due to a reduction in charge outs for Digital Strategy FTEs as the PGE.com redesign project will complete in 2025. The remaining $0.7 million increase reflects funding needed to implement new digital tools and processes in response to customer feedback and escalation. The list of customer needs is constantly evolving, but past examples of new digital tools include the Savings Finder which launched in 2025. The tool asks customers to answer a few short questions about their financial and medical situation and provides personalized recommendations for what programs might save them money. This saves customers time as they do not need to read each of the individual program overview pages to figure out their eligibility.

C. Conclusion

Based on the evidence discussed above and the associated attachments and workpapers, PG&E requests that the Commission grant the requests presented in this chapter for Customer Service activities.

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 5

ATTACHMENT A

2024 CSO ANNUAL REPORT

PACIFIC GAS AND ELECTRIC COMPANY

CUSTOMER SERVICE OFFICE TRANSFORMATION

ANNUAL REPORT FOR THE PERIOD JANUARY 1, 2024 – DECEMBER 31, 2024

IN COMPLIANCE WITH CPUC DECISION 22-12-033

SUBMITTED FEBRUARY 28, 2025



PACIFIC GAS AND ELECTRIC COMPANY
CUSTOMER SERVICE OFFICE TRANSFORMATION
ANNUAL REPORT FOR THE PERIOD
JANUARY 1, 2024 – DECEMBER 31, 2024
IN COMPLIANCE WITH CPUC DECISION 22-12-033
SUBMITTED FEBRUARY 28, 2025

TABLE OF CONTENTS

I. Introduction 1

II. Background 1

III. Customer Service Office Transformation Model Overview 3

IV. Key Performance Metrics 4

V. Conclusion 9

Attachment A, Neighborhood Payment Centers (NPC)

Attachment B, Community-Based Organizations (CBO)

PACIFIC GAS AND ELECTRIC COMPANY CUSTOMER SERVICE OFFICE TRANSFORMATION ANNUAL REPORT FOR THE PERIOD JANUARY 1, 2024 – DECEMBER 31, 2024 IN COMPLIANCE WITH CPUC DECISION 22-12-033

I. Introduction

Pursuant to Ordering Paragraph (OP) 5 of California Public Utilities Commission (CPUC or Commission) Decision (D.) 22-12-033 (CSO Closure Decision), Article 2.3 (Metrics for Evaluating the CSO Closure and Transformation Program) of the Memorandum of Understanding (MOU)[1] and Article 3 (Summary of Settlement Agreement) of the Settlement Agreement between Pacific Gas and Electric Company (PG&E) and the National Diversity Coalition (NDC)[2] approved by the CSO Closure Decision, PG&E submits its second Customer Service Office Closure and Transformation Annual Report (CSO Transformation Annual Report) for the reporting period January 1, 2024 through December 31, 2024.

Article 2.3.1 of the MOU and Article 3 of the Settlement Agreement requires PG&E to track and report on specific metrics for the purpose of evaluating the CSO Closure and Transformation Program; See Section IV below for a discussion of each metric. In addition, Article 2.3.2 requires PG&E to provide the CSO Transformation Annual Report to the service list of the CSO Closure and Transformation Proposal proceeding Application (A.) 22-04-016 beginning March 1 of the first full year following the Commission's approval of PG&E's request.[3]

II. Background

In March 2020, PG&E closed all its local offices out of concern for its employees, customers, and the public's health and safety during the COVID-19

---

1 D.22-12-033, Attachment A, Memorandum of Understanding Between and Among The Utility Reform Network, Center for Accessible Technology, The Public Advocates Office, and Pacific Gas and Electric Company (the Parties) on PG&E's Customer Service Offices Closure and Transformation Proposal (MOU), Article 2.3.

2 D.22-12-033, Attachment B, Joint Motion of Pacific Gas and Electric Company (U 39 M) and The National Diversity Coalition for Approval of Settlement Agreement, Article 3 Summary of Settlement Agreement

3 The Commission adopted D.22-12-033 on December 15, 2022. PG&E submits this CSO Transformation Annual Report on February 28, 2025 for the January 1, 2024 through December 31, 2024 reporting period.

pandemic. On April 28, 2022, PG&E filed Application (A.) 22-04-016 (the CSO Closure and Transformation Application) with the Commission requesting authorization to close its remaining 65 CSOs and permanently transition its CSO employees' scope of work to focus on targeted outreach to PG&E's low-income, Access and Functional Needs (AFN) and vulnerable customers. Targeted customer outreach occurs through outbound calls, "case management" support, in-person outreach and Community Based Organization (CBO) and Faith-Based Organization (FBO) engagement. Additionally, to measure the impacts of the CSO Closure and Transformation Application, PG&E proposed to track and report key metrics[4] for three years by submitting annual reports.[5] Prior to filing the Application, PG&E worked collaboratively with The Public Advocates Office (Cal Advocates), The Utility Reform Network (TURN), and the Center for Accessible Technology (CforAT) to develop the MOU. The MOU supported PG&E's Application to close its 65 CSOs and permanently transition CSO employees to their new scope of work.

To address concerns raised by NDC, PG&E and NDC engaged in Settlement discussions and subsequently reached agreement. In part,[6] the Settlement Agreement with NDC stated that PG&E may permanently close all 65 CSO's on January 1, 2023 and in addition to PG&E tracking and reporting on the metrics described in Section 2.3.1 of the MOU, PG&E agreed to provide options for customers to voluntarily indicate their race and/or ethnicity, which PG&E will include as aggregated and anonymous values in its Annual CSO Closure and Transformation Report.[7]

On December 15, 2022, the Commission approved D.22-12-033, including the MOU and the Settlement Agreement[8] between PG&E and the NDC, which authorized PG&E to permanently close its remaining CSOs and transition its CSO workforce to a new customer service model based on proactive, targeted outreach to its most vulnerable customers.

---

4 Article 2.3.1 of the MOU.

5 Article 2.3.2 of the MOU.

6 D.22-12-033 at 33-34.

7 D.22-12-033 at 40. "Reporting on race and/or ethnicity information that is voluntarily provided by customers, aggregated and anonymized does not violate privacy statutes and is consistent with all applicable laws."

8 Joint Motion of Pacific Gas and Electric Company and the National Diversity Coalition for Approval of Settlement Agreement, September 15, 2022.

III. Customer Service Office Transformation Model Overview

Effective January 1, 2023, PG&E closed its remaining 65 CSOs. PG&E transitioned employees to the customer service outreach model which targets outreach to PG&E's most vulnerable customers. Under this model, PG&E employees continue to proactively connect with customers whose bills are in arrears and provide recurring outreach that is necessary to help customers make consistent on-time bill payment more achievable. Customers are offered information about and assistance with programs such as California Alternative Rates for Energy (CARE), Family Electric Rates Assistance (FERA), the Arrearage Management Plan (AMP) and Medical Baseline Program. Customers are apprised of financial assistance through the Low-Income Home Energy Assistance Program (LIHEAP) and Relief for Energy Assistance through Community Help (REACH) Program. Outreach also consists of general information about other utility programs such as payment plans, Energy Savings Assistance Program (ESA) and electric rate plan options. For the electric rate plan options, customer energy usage is analyzed to compare annual costs under various applicable residential rate schedules for bundled services to determine the optimal rate schedule for customer households. Employees recognize the uniqueness of each customer and tailor their interactions accordingly. Additionally, if a customer is not available on the initial call, customers are provided with a dedicated PG&E callback number directly to CSO representatives to help with aforementioned-services and programs.

CSO representatives support vulnerable customers through participation in community events. In 2024, CSO representatives participated in 163 community outreach events which is a 53% increase compared to 2023. Community outreach events inform customers of available financial assistance programs, Medical Baseline, ESA, rates and pay plans. The CSO representatives at in-person outreach events provide customers the real-time opportunity to enroll in AFN self-identification and to receive assistance with non-payment PG&E account transactions.

In 2024, PG&E leveraged the expertise and knowledge of CSO representatives to better serve its vulnerable customers with the CARE and Medical Baseline programs. 100 percent of CARE calls were redirected from the Contact Center to CSO (during CSO's operating hours) to provide in-depth service and meet the needs of low to moderate income customers. CSO representatives spend the

required time guiding customers through the application and verification processes, answering questions and resolving any issues. Additionally, skilled CSO representatives began processing medical baseline applications and recertifications to decrease processing time and increase customer satisfaction by calling customers once approved.

PG&E has conducted annual training to CSO representatives on the challenges vulnerable customers face and how to communicate with customers in an empathetic and helpful manner.[9] The training reviews key concepts including potential challenges vulnerable customers may face, and how to effectively utilize soft skills and active listening to understand their needs.

PG&E partnered together with CBOs and FBOs through attendance at community outreach events. These events allowed for the enrollment of customers in utility programs promoting bill affordability such as CARE, FERA, Medical Baseline, and ESA program. Customers are educated on PSPS, EPSS preparedness, DDARC and portable battery backup programs. PG&E collaborated with CBOs and FBOs by attending community outreach training sessions. This training includes, but is not limited to, AMP, Community Wildfire Safety Program (PSPS), Medical Baseline Program and CARE. Through this collaboration PG&E discusses with CBOs and FBOs the potential of becoming a Neighborhood Payment Center to process in-person PG&E payments.

IV. Key Performance Metrics

The CSO Transformation Annual Report is intended to provide a summary of PG&E's activities and performance for the calendar year of 2024. This report is in direct support of PG&E's goal to have CSO's workforce focus on targeted customer outreach to its most vulnerable customers and provide meaningful interactions with them. The metrics below are designed to evaluate the success of the CSO Transformation Program.

---

9 Joint Motion of Pacific Gas and Electric Company and the National Diversity Coalition for Approval of Settlement Agreement, September 15, 2022, p. 3.

TABLE 1
2024 METRICS

Key Performance Metrics	2024 Metric Results
Success rate of customer contact attempts	85.6%
Number of callbacks received	45,456
Average Speed of Answer (ASA)(a) for the call center and web-based online completion rate	ASA = 22 seconds Web-based online completion rate = 44%
Number of customers enrolled by CSO employees in the CARE, FERA, AMP and other assistance programs consistent with Subsections 2.1.2 and 2.1.3 from MOU	CARE = 12,095 FERA = 275 AMP = 6,408 ESA = 52
Number of ESA program referrals	16,084
Number of Medical Baseline program applications sent to customers	14,271
Number of LIHEAP pledges from customers contacted by CSO employees	898
Number of new customers that self-identify as vulnerable, disabled, and AFN as a result of CSO outreach	4,213
Number of payment transactions, per channel, with payment transaction data of all CSO exclusive customers, including a separate breakout of data for CARE, FERA, and Medical Baseline customers	See Table 1-1 CARE – Table 1-2 FERA – Table 1-3 Medical Baseline – Table 1-4
Number of non-payment transactions, per channel, with non-payment transactions data of all CSO exclusive customers, including a separate breakout of data by CARE, FERA, and Medical Baseline customers	See Table 2
Percentage of CSO exclusive customers who made zero payments in the past twelve months, the percentage of CSO exclusive customers disconnected for non-payment in the past twelve months, and the percentage of CSO exclusive customers in arrears at the time of reporting	See Table 3-1 Table 3-2 for CSO Exclusive in Arrears
Number of NPCs serving each city with a closed CSO and the distance of each NPC from the closed CSO location	See Attachment A
Hours of each NPC serving the city within the closed CSO	See Attachment A
The name of every CBO as described in Section 2.2.1.1 of the MOU who provided outreach and/or enrollment in utility programs promoting bill affordability serving the city and/or county with the closed CSO, including the language(s) in which services are provided by the CBO and the number of customers that each CBO reports that they have enrolled in utility programs	See Attachment B
PG&E will provide options for customers to voluntarily indicate their race and/or ethnicity, which PG&E will include as aggregated and anonymous values in its annual CSO Closure Report.	See Table 4

(a) ASA is a measure of the time in seconds it takes for calls to be answered by an agent after the customer enters the queue for an agent. Note that this is a volatile and seasonal metric influenced by outside factors.

TABLE 2
NUMBER OF PAYMENTS PER CHANNEL

Pay Channel	Total Payments	Total Pay Amounts
Mailed Payment	249,421	$285,876,079.99
Pay By Phone	226,786	$59,074,168.47
Online/PGE.Com	251,378	$145,650,420.72
Pay Station – NPC	199,912	$45,190,474.32
Bank EFT	68,922	$29,655,135.95
Liheap Program	3,288	$2,540,110.58
Reach Program	734	$520,722.00
Collection Agency	343	$11,386.30
Grand Total	1,000,784	$568,618,498.33

Note: A customer can be counted in multiple tables below if the customer is in multiple programs.

TABLE 3
NUMBER OF PAYMENTS PER CHANNEL FOR CARE CUSTOMERS

Pay Channel	Total Payments	Total Pay Amounts
Pay By Phone	127,966	$25,223,083.95
Pay Station – NPC	122,073	$21,359,357.71
Online/PGE.Com	124,518	$24,872,180.55
Mailed Payment	69,568	$10,954,455.02
Bank EFT	38,011	$6,209,594.55
Liheap Program	2,970	$2,205,681.20
Reach Program	324	$219,835.00
Collection Agency	119	$21,348.89
Grand Total	485,549	$91,065,536.87

TABLE 4
NUMBER OF PAYMENTS PER CHANNEL FOR FERA CUSTOMERS

Pay Channel	Total Payments	Total Pay Amounts
Online/PGE.com	2,690	$760,430.85
Pay By Phone	1,621	$466,882.62
Mailed Payment	929	$248,399.93
Pay Station - NPC	874	$228,442.22
Bank EFT	383	$102,790.81
Liheap Program	4	$1,797.00
Collection Agency	1	$310.47
Grand Total	6,502	$1,809,053.90

TABLE 5
NUMBER OF PAYMENTS PER CHANNEL FOR MEDICAL BASELINE CUSTOMERS

Pay Channel	Total Payments	Total Pay Amounts
Mailed Payment	9,261	$1,905,630.57
Pay By Phone	5,164	$1,860,557.20
Pay Station - NPC	16,531	$3,754,187.59
Online/PGE.Com	16,655	$4,323,478.64
Bank EFT	4,344	$936,592.31
Liheap Program	661	$478,994.84
Reach Program	348	$239,328.00
Collection Agency	11	$7,966.17
Grand Total	52,975	$13,506,735.32

TABLE 6
NON-PAYMENT TRANSACTIONS

Group	CSR	IVR/WEB	Total
Non-Program Participants[(a)]	13,038	7,243	20,281
CARE	16,285	16,815	33,100
FERA	168	180	348
MED	2,440	2,704	5,144

Note: A customer can be counted in multiple groups if the customer is in multiple programs.

(a) Non-Program Participants are defined as those customers that are not enrolled in CARE, FERA or Medical Baseline (MED).

TABLE 7
CSO EXCLUSIVE CUSTOMERS

The percentage of CSO exclusive customers[(a)] who made zero payments in the past 12 months	1.6%
The percentage of CSO exclusive customers disconnected for non-payment in the past 12 months	3.9%

(a) CSO Exclusive Customers are defined as those customers who utilized Customer Service Offices exclusively in the 12 months prior to March 2020.

TABLE 8
CSO EXCLUSIVE CUSTOMERS IN ARREARS

Past Due Aging	% of Accounts
Days 31-60	10.6%
Days 61-90	6.1%
Days 91-120	3.4%
Days 121-150	2.0%
Days 151-180	1.5%
Days 181-270	2.1%
Days 271-365	1.4%
Over 365 Days	1.7%

TABLE 9
RACE AND/OR ETHNICITY

Race/Ethnicity	Total Accounts
White	3,361
Hispanic or Latino	1,847
Prefer not to answer	1,307
Black or African American	735
Asian	765
Other	356
American Indian or Alaska Native	152
Native Hawaiian or Other Pacific Islander	125

Note: As mentioned above (footnote 7), customers reporting on race and ethnicity is voluntary and anonymized. It is not a condition of service.

V. Conclusion

The CSO Transformation Report summarizes PG&E's performance on key metrics and represents CSO outreach efforts to our most vulnerable customers in 2024. In CSO, now known as Customer Service Outreach, customers are our priority and they will be provided with solutions unique to their situation. CSO is committed to serving our customers and continues to identify opportunities to support vulnerable customers and the communities we serve.

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT A

NEIGHBORHOOD PAYMENT CENTERS (NPC)

BusinessName	Address	City	State	Zip	Radius Distance To Local Office	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Walmart #01615 (Pittsburg)	2203 Loveridge Road	Pittsburg	CA	94565	3	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02697 (Antioch)	4893 Lone Tree Way	Antioch	CA	94509	2.84	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Cash 1 #258	3692 Delta Fair Blvd	Antioch	CA	94509	1.79	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	10:00 AM - 05:00 PM	10:00 AM - 02:00 PM
Calif Check Cashing #614	172 Atlantic Avenue	Pittsburg	CA	94565	4.2	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 05:00 PM	Closed - Closed
Antioch Food Center	111 E. 18th	Antioch	CA	94509	1.12	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
Cardenas Market #207	2100 Railroad Avenue	Pittsburg	CA	94565	4.1	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM
La Mexicana Market (Bakery)	416 Bear Mountain Blvd.	Arvin	CA	93203	16	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 02:00 PM	Closed - Closed
Mi Rancho Market - McFarland	400 West Perkins road	McFarland	CA	93250	24.18	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM
Lee's Niles Drugs	1405 Niles Street	Bakersfield	CA	93305	2.3	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:30 AM - 03:00 PM	Closed - Closed
Fiesta Food Market	1400 Padre Street	Bakersfield	CA	93307	2	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	Closed - Closed
4th Street Market	307 4th Street	Bakersfield	CA	93304	1.4	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM
La Rosa Market	700 Irene St.	Bakersfield	CA	93305	2.3	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM
All Star Market	630 Fairfax Ave.	Bakersfield	CA	93306	5.07	05:00 AM - 12:00 AM	05:00 AM - 12:00 AM	05:00 AM - 12:00 AM	05:00 AM - 12:00 AM	05:00 AM - 12:00 AM	05:00 AM - 12:00 AM	06:00 AM - 12:00 AM
Walmart #01624 (Bakersfield,Fashion Place)	2601 Fashion Place	Bakersfield	CA	93306	3.4	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #01574 (Bakersfield, Colony St)	6225 Colony Street	Bakersfield	CA	93307	5.6	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02557 (Bakersfield,Rosedale Hwy)	8400 Rosedale Hwy.	Bakersfield	CA	93312	4.2	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05134 (Bakersfield, Gosford Rd)	5075 Gosford Road	Bakersfield	CA	93313	6.09	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
ACE #4176 - Buck Owens Bakersfield	2600 Buck Owens Blvd	Bakersfield	CA	93308	1.3	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 04:00 PM	Closed - Closed
Fiesta Market (Wasco)	915 Poso Dr	Wasco	CA	93280	22.89	07:00 AM - 07:00 PM	07:00 AM - 07:00 PM	07:00 AM - 07:00 PM	07:00 AM - 07:00 PM	07:00 AM - 07:00 PM	07:00 AM - 07:00 PM	Closed - Closed
Walmart #03140 (Bakersfield, Chester Ave)	3111 N. Chester Avenue	Bakersfield	CA	93308	3.85	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #03138 (Bakersfield,Calloway Drive)	5625 Calloway Drive	Bakersfield	CA	93312	5.9	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #03141 (Bakersfield,Brundage Lane)	5037 E Brundage Lane	Bakersfield	CA	93307	4.36	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Quick and Handy Market	702 Bernard	Bakersfield	CA	93305	2.15	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
Walmart #05215 (Delano)	530 Woollomes Ave	Delano	CA	92215	28.3	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
La Hacienda Market - Shafter	315 James Street	Shafter	CA	93263	16.88	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
Walmart #05859 (Wasco,Central Ave)	401 N Central Ave	Wasco	CA	93280	24.67	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Meyers Big Stop	127 S Shafter Ave	Shafter	CA	93263	16.76	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM
City Food Market	900 Dr. Martin Luther King Jr.	Bakersfield	CA	93307	2.14	07:30 AM - 09:30 PM	07:30 AM - 09:30 PM	07:30 AM - 09:30 PM	07:30 AM - 09:30 PM	07:30 AM - 09:30 PM	07:30 AM - 09:30 PM	07:30 AM - 09:30 PM
El Milagro Market	575 Panama Lane	Bakersfield	CA	93307	5.59	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM
Smart Ads and Multi Money Srvs	2105 Edison Hwy P-12	Bakersfield	CA	93305	2.85	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 05:00 PM	10:00 AM - 07:00 PM
Walmart #03139 (Bakersfield - Allen)	1249 Allen Rd	Bakersfield	CA	93314	7.05	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Chester Wireless	147 Chester Ave	Bakersfield	CA	93301	1.41	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 06:00 PM
Fiesta Food Market #1	2211 E California Ave	Bakersfield	CA	93307	3.01	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM
Dollar World & Beauty Supply	815 34TH ST	Bakersfield	CA	93301	1.1	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM
Tropicana Supermarket (Wasco)	2425 Hwy 46	Wasco	CA	93280	24.19	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
Fiesta Market #2 (Lamont)	9710 Main St	Lamont	CA	93241	9.06	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM
Wasco Liquor	801 7th Street	Wasco	CA	93280	23.14	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
Smart Shipping & Services II	3122 Niles St	Bakersfield	CA	93306	3.9	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 06:00 PM
Shafter True Value	113 N. Central Valley Highway	Shafter	CA	93263	17.12	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM
ACE #4306 - H St Bakersfield	2707 South H Street	Bakersfield	CA	93304	3.24	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 07:00 PM	09:00 AM - 05:00 PM	Closed - Closed
ACE #4621 - Union Ave Bakersfld	2011 Union Avenue	Bakersfield	CA	93305	0.99	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 07:00 PM	09:00 AM - 04:00 PM	Closed - Closed
Calimex Market	501 Bohannan Avenue	Bakersfield	CA	93307	5.41	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
Walmart #01563 (Lancaster)	44665 Valley Central Way	Lancaster	CA	93536	50	06:00 AM - 11:00 PM	06:00 AM - 11:00 PM	06:00 AM - 11:00 PM	06:00 AM - 11:00 PM	06:00 AM - 11:00 PM	06:00 AM - 11:00 PM	06:00 AM - 11:00 PM
ACE #4604 - Berkeley	2005 San Pablo Avenue	Berkeley	CA	94702	1.07	09:00 AM - 07:00 PM	09:00 AM - 05:00 PM	Closed - Closed	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 05:00 PM	Closed - Closed
Mad Mountain Wireless-Burney	37227 Main Street	Burney	CA	96013	1	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	10:00 AM - 02:00 PM	Closed - Closed
Money Mkt. Fin. Svcs.-Santa Cruz	903 Pacific Avenue, #102	Santa Cruz	CA	95060	3.34	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	Closed - Closed	Closed - Closed
Beach Street Video	5 E. Beach Street	Watsonville	CA	95076	12.3	10:00 AM - 08:00 PM	10:00 AM - 08:00 PM	10:00 AM - 08:00 PM	10:00 AM - 08:00 PM	10:00 AM - 08:00 PM	10:00 AM - 08:00 PM	10:00 AM - 08:00 PM
Las Lomas Market	182 Hall Road	Watsonville	CA	95076	15.3	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM
Discoteca Exitos Latinos	1420 Freedom Blvd.	Watsonville	CA	95076	12.1	10:00 AM - 06:30 PM	10:00 AM - 06:30 PM	10:00 AM - 06:30 PM	10:00 AM - 06:30 PM	10:00 AM - 06:30 PM	10:00 AM - 05:30 PM	10:00 AM - 05:30 PM
La Condesa Market	1079 S. Green Valley Road	Watsonville	CA	95076	10.93	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
Cardenas Market #206	1437 Freedom Blvd.	Watsonville	CA	95076	11.62	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	Closed - Closed	Closed - Closed	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM
The Inkwell	323-A North Tehama Street	Willows	CA	95988	15.3	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	Closed - Closed	Closed - Closed
Orland Food and Liquor Inc	160 E. Walker St	Orland	CA	95963	18.3	08:00 AM - 03:00 PM	08:00 AM - 03:00 PM	08:00 AM - 03:00 PM	08:00 AM - 03:00 PM	08:00 AM - 03:00 PM	Closed - Closed	Closed - Closed
El Toro Loco Grocery (Hamilton City)	570 Main	Hamilton City	CA	95951	9.2	05:00 AM - 09:00 PM	05:00 AM - 09:00 PM	05:00 AM - 09:00 PM	05:00 AM - 09:00 PM	05:00 AM - 09:00 PM	05:00 AM - 09:00 PM	05:00 AM - 09:00 PM
Walmart #02053 (Willows)	470 Airport Avenue	Willows	CA	95988	25.5	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02044 (Chico)	2044 Forest Avenue	Chico	CA	95928	2.55	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Moe's Los Tres Potrillos	228 6th Street	Orland	CA	95963	19.3	05:00 AM - 10:00 PM	05:00 AM - 10:00 PM	05:00 AM - 10:00 PM	05:00 AM - 10:00 PM	05:00 AM - 10:00 PM	05:00 AM - 10:00 PM	05:00 AM - 10:00 PM
Calif Check Cashing #663	1456 Mangrove Avenue	Chico	CA	95926	1.21	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 03:00 PM	Closed - Closed
Self Help for the Elderly	601 Jackson Street	San Francisco	CA	94133	0.1	09:00 AM - 03:30 PM	09:00 AM - 03:30 PM	09:00 AM - 03:30 PM	09:00 AM - 03:30 PM	09:00 AM - 03:30 PM	Closed - Closed	Closed - Closed
Photo Focus	1100 Stockton Street	San Francisco	CA	94133	0.2	09:30 AM - 05:30 PM	09:30 AM - 05:30 PM	09:30 AM - 05:30 PM	09:30 AM - 05:30 PM	09:30 AM - 05:30 PM	09:30 AM - 05:30 PM	Closed - Closed
U-Send Express (EddySt.)	409 Eddy Street	San Francisco	CA	94109	0.83	10:00 AM - 05:00 PM	10:00 AM - 05:00 PM	10:00 AM - 05:00 PM	10:00 AM - 05:00 PM	10:00 AM - 05:00 PM	10:00 AM - 05:00 PM	Closed - Closed
Calif Check Cashing #574	1098 Market Street, Ste B	San Francisco	CA	94102	0.92	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	10:00 AM - 05:00 PM	Closed - Closed
Mar-Val Food Stores	2265 E. Hwy. 20	Nice	CA	95464	17.08	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
Walmart #01979 (Clearlake)	15960 Dam Road	Clearlake	CA	95422	2.79	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
A 1 Check Cashing (Lakeport)	369 Lakeport Blvd	Lakeport	CA	95453	16	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 03:00 PM	Closed - Closed
Bridge Services/Serv. Del Puente	3737-B Main Street	Kelseyville	CA	95451	11.1	11:00 AM - 07:00 PM	11:00 AM - 07:00 PM	11:00 AM - 07:00 PM	11:00 AM - 07:00 PM	11:00 AM - 07:00 PM	11:00 AM - 06:00 PM	11:00 AM - 06:00 PM
State Foods (Avenal)	708 Skyline Blvd	Avenal	CA	93204	15.8	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM
Valley Gas & Food Mart	600 E. Elm	Coalinga	CA	93210	0.5	05:00 AM - 11:00 PM	05:00 AM - 11:00 PM	05:00 AM - 11:00 PM	05:00 AM - 11:00 PM	05:00 AM - 11:00 PM	05:00 AM - 11:00 PM	07:00 AM - 10:00 PM
Los Amigos Food Center #9 (Huron)	36210 S. Lassen Ave.	Huron	CA	93234	15	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM
Lassen Market	36668 Lassen Ave	Huron	CA	93234	14.8	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM

BusinessName	Address	City	State	Zip	Radius Distance To Local Office	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Amigo Market	407 Skyline	Avenal	CA	93204	15.8	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
State Foods (Coalinga)	203 W Polk Street	Coalinga	CA	93210	0.3	07:00 AM - 11:00 PM	07:00 AM - 11:00 PM	07:00 AM - 11:00 PM	07:00 AM - 11:00 PM	07:00 AM - 11:00 PM	07:00 AM - 11:00 PM	07:00 AM - 11:00 PM
Tropicana #2 (Coalinga)	555 E Elm Ave	Coalinga	CA	93210	0.04	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM
Fiesta Latino Market	36869 S. Lassen Avenue	Huron	CA	93234	14.91	04:00 AM - 12:00 AM	04:00 AM - 12:00 AM	04:00 AM - 12:00 AM	04:00 AM - 12:00 AM	04:00 AM - 12:00 AM	04:00 AM - 12:00 AM	04:00 AM - 12:00 AM
Walmart #03493 (Martinez)	1021 Arnold Drive	Martinez	CA	94553	5.21	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM	Closed - Closed
Cash 1 #263	2550 Springs Rd	Vallejo	CA	94591	14.29	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Calif Check Cashing #608	1521 Monument Blvd	Concord	CA	94520	0.89	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Calif Check Cashing #613	1855 Willow Pass Rd., Ste B	Concord	CA	94520	1.45	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	10:00 AM - 05:00 PM	10:00 AM - 02:00 PM
Walmart #02280 (Mountain View)	600 Showers Drive	Mountain View	CA	94040	6.55	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Jennifer Joyeria	1923 Latham St	Mountain View	CA	94040	5.7	07:30 AM - 08:30 PM	07:30 AM - 08:30 PM	07:30 AM - 08:30 PM	07:30 AM - 08:30 PM	07:30 AM - 08:30 PM	07:30 AM - 08:30 PM	08:00 AM - 08:30 PM
Walmart #03123 (Santa Clara)	3255 Mission College Blvd	Santa Clara	CA	95054	5.95	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02486 (San Jose)	4080 Stevens Creek Blvd	San Jose	CA	95129	2.86	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Calif Check Cashing #579	2325 El Camino Real, Ste 102	Santa Clara	CA	95050	3.35	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 03:00 PM	Closed - Closed
EZ Coin Laundromat	883 Borregas Avenue	Sunnyvale	CA	94805	4.25	10:00 AM - 08:00 PM	10:00 AM - 08:00 PM	10:00 AM - 08:00 PM	10:00 AM - 08:00 PM	10:00 AM - 08:00 PM	10:00 AM - 08:00 PM	10:00 AM - 08:00 PM
United Market (Dinuba)	1665 E. El Monte Way	Dinuba	CA	93618	0.7	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
J Market and Gas	1384 Manning Avenue	Reedley	CA	93654	5.6	07:00 AM - 09:30 PM	07:00 AM - 09:30 PM	07:00 AM - 09:30 PM	07:00 AM - 09:30 PM	07:00 AM - 09:30 PM	07:00 AM - 09:30 PM	07:00 AM - 09:30 PM
Walmart #05394 (Dinuba)	770 West El Monte Way	Dinuba	CA	93618	0.76	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02536 (Tulare)	1110 East Prosperity Avenue	Tulare	CA	93274	22.2	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05956 (Visalia,Mooney Blvd)	3750 South Mooney Blvd.	Visalia	CA	93277	17.2	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #01826 (Visalia, Noble Avenue)	1819 E. Noble Avenue	Visalia	CA	93292	16	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
El Pueblo Supermercado	815 Anchor Ave.	Orange Cove	CA	93646	6.6	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM
Joyeria Herrera's (Reedley)	797 N Reed	Reedley	CA	93654	5.5	09:30 AM - 06:30 PM	09:30 AM - 06:30 PM	09:30 AM - 06:30 PM	09:30 AM - 06:30 PM	09:30 AM - 06:30 PM	09:30 AM - 06:30 PM	09:30 AM - 04:30 PM
CV Communications	12789 1st Dr	Cutler	CA	93615	5.86	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM
Walmart #05635 (Visalia,N Demaree)	1320 North Demaree Street	Visalia	CA	93291	16.2	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
La Familia Market	1604 G Street	Reedley	CA	93654	4.65	01:00 PM - 11:00 PM	01:00 PM - 11:00 PM	01:00 PM - 11:00 PM	01:00 PM - 11:00 PM	01:00 PM - 11:00 PM	01:00 PM - 11:00 PM	01:00 PM - 11:00 PM
United Market (Reedley)	577 I Street	Reedley	CA	93654	5.55	07:00 AM - 09:30 PM	07:00 AM - 09:30 PM	07:00 AM - 09:30 PM	07:00 AM - 09:30 PM	07:00 AM - 09:30 PM	07:00 AM - 09:30 PM	07:00 AM - 09:30 PM
Primo Market (OC)	409 Park Blvd	Orange Cove	CA	93646	7.17	05:00 AM - 09:00 PM	05:00 AM - 09:00 PM	05:00 AM - 09:00 PM	05:00 AM - 09:00 PM	05:00 AM - 09:00 PM	05:00 AM - 09:00 PM	06:00 AM - 09:00 PM
Sultana Food Mart	10427 Ave 416	Sultana	CA	93666	2.8	05:00 AM - 10:00 PM	05:00 AM - 10:00 PM	05:00 AM - 10:00 PM	05:00 AM - 10:00 PM	05:00 AM - 10:00 PM	05:00 AM - 10:00 PM	05:00 AM - 10:00 PM
Maria's Fine Jewelry (Dinuba)	2168 E El Monte Way	Dinuba	CA	93618	1.05	09:30 AM - 06:00 PM	09:30 AM - 06:00 PM	09:30 AM - 06:00 PM	09:30 AM - 06:00 PM	09:30 AM - 06:00 PM	09:30 AM - 06:00 PM	09:30 AM - 03:00 PM
Sunrise Mini Mart	10015 S Alta Ave	Reedley	CA	93654	3.3	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
Calif Check Cashing #570	1805 S. Mooney Blvd	Visalia	CA	93277	16.29	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	10:00 AM - 02:00 PM
Cash 1 #1046	2600 S. Mooney Blvd. Ste L8	Visalia	CA	93277	16.81	Closed - Closed	Closed - Closed	Closed - Closed	Closed - Closed	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM
Walmart #01877 (Porterville)	1250 W. Henerson Ave.	Porterville	CA	93257	37	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM
Los Amigos Market	600 Park Blvd.	Orange Cove	CA	93646	7.13	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM
Mi Pueblito Services	41562 Road 128	Orosi	CA	93647	5.73	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 06:00 PM	10:00 AM - 03:00 PM
Valley Foods Supermarket (Iva)	32717 Road 160	Ivanhoe	CA	93235	14.6	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
Sunnyside Bus. Center (Ivanhoe)	33060 Road 159	Ivanhoe	CA	93235	14.22	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	Closed - Closed	Closed - Closed
Davis St. Family Resource Center	3081 Teagarden Street	San Leandro	CA	94577	4.75	09:00 AM - 04:00 PM	09:00 AM - 04:00 PM	09:00 AM - 04:00 PM	09:00 AM - 04:00 PM	09:00 AM - 04:00 PM	Closed - Closed	Closed - Closed
Alameda Mail Boxes Plus	2532 Santa Clara Avenue	Alameda	CA	94501	3.05	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	10:00 AM - 02:00 PM	Closed - Closed
ACE #4078 - Oak (N. Intl Blvd)	3229 International Blvd.	Oakland	CA	94601	1.21	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	08:00 AM - 06:00 PM	Closed - Closed
Walmart #02648 (San Leandro)	1919 Davis Street	San Leandro	CA	94577	3.61	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Gazzali's Supermarket	7000 Bancroft Avenue	Oakland	CA	94605	0.29	10:00 AM - 05:00 PM	10:00 AM - 05:00 PM	10:00 AM - 05:00 PM	10:00 AM - 05:00 PM	10:00 AM - 05:00 PM	Closed - Closed	Closed - Closed
D & L Payment Center	3439 International Blvd.	Oakland	CA	94601	2.25	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	Closed - Closed
Calif Check Cashing #573	3421 High Street	Oakland	CA	94619	1.39	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Calif Check Cashing #576	4300 International Blvd	Oakland	CA	94601	1.75	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 04:00 PM	10:00 AM - 02:00 PM
Calif Check Cashing #577	10950 International Blvd., Ste F	Oakland	CA	94603	2.67	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 07:00 PM	10:00 AM - 05:00 PM	Closed - Closed
Cardenas Market #210	1630 Hgh Street	Oakland	CA	94601	1.65	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM
Bay Area Wireless	3237 Foothill Blvd.	Oakland	CA	94601	2.35	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM
Wildberries Market	747 13th Street	Arcata	CA	95521	6.5	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	Closed - Closed	Closed - Closed
Walmart #05629 (Eureka)	3300 Broadway	Eureka	CA	95501	3.13	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Horizon Business Products	1137 Main Street	Fortuna	CA	95540	1	08:30 AM - 05:00 PM	08:30 AM - 05:00 PM	08:30 AM - 05:00 PM	08:30 AM - 05:00 PM	08:30 AM - 05:00 PM	Closed - Closed	Closed - Closed
Walmart #01972 (Livermore)	2700 Las Positas Road	Livermore	CA	94550	17.55	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02119 (Milpitas)	301 Ranch Drive	Milpitas	CA	95035	6.46	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05426 (Fremont West)	40580 Albrae Street	Fremont	CA	94538	0.82	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02989 (Fremont)	44009 Osgood Road	Fremont	CA	94539	2.16	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Pure Aqua	34655 Alvarado-Niles Road	Union City	CA	94587	5.63	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 05:00 PM	Closed - Closed
Arteaga's Food Center	5524 Thornton Road	Newark	CA	94560	3.5	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM
Calif Check Cashing #567	30 South Abbott Avenue	Milpitas	CA	95035	6.55	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 02:00 PM	Closed - Closed
Calif Check Cashing #682	847 E. Stanley Blvd	Livermore	CA	94550	15.8	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Calif Check Cashing #583	37217 Fremont Blvd.	Fremont	CA	94536	3.76	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 07:00 PM	10:00 AM - 02:00 PM	Closed - Closed
Windfall Donuts & Sandwiches	2344 Cedar Avenue	Fresno	CA	93703	3	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 05:00 PM	10:00 AM - 05:00 PM
Liquor King	6751 North Blackstone Avenue	Fresno	CA	93710	7	09:00 AM - 10:00 PM	09:00 AM - 10:00 PM	09:00 AM - 10:00 PM	09:00 AM - 10:00 PM	09:00 AM - 10:00 PM	09:00 AM - 09:00 PM	09:00 AM - 07:00 PM
ACE #4110 - Willow, Clovis	2774 Willow Avenue, #115	Clovis	CA	93612	5.5	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	10:00 AM - 05:00 PM	Closed - Closed
Clovis Check Cashing	111 W. Bullard Avenue, Suite 102	Clovis	CA	93612	7.2	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 05:00 PM	10:00 AM - 02:00 PM
ACE #4177 - Kings Cyn, Fresno	4796 E. Kings Canyon Road	Fresno	CA	93702	2.93	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 07:00 PM	11:00 AM - 04:00 PM
Stereo & DJ Outlet	4711 E. Kings Canyon Road	Fresno	CA	93702	2.2	08:30 AM - 07:00 PM	08:30 AM - 07:00 PM	08:30 AM - 07:00 PM	08:30 AM - 07:00 PM	08:30 AM - 07:00 PM	08:30 AM - 07:00 PM	09:00 AM - 06:00 PM
ACE #4195 - E.McKinley, Fresno	2425 E. McKinley Avenue	Fresno	CA	93703	2	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 06:00 PM	Closed - Closed	Closed - Closed
ACE #4112 - E.Bullard, Fresno	432 E. Bullard Avenue	Fresno	CA	93710	6.1	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 06:00 PM	Closed - Closed
ACE #4178 - E.Shaw, Fresno	785 E. Shaw Avenue	Fresno	CA	93710	5.1	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	09:00 AM - 05:00 PM	11:00 AM - 04:00 PM
ACE #4049 - W Shaw, Fresno	3241 W. Shaw Avenue	Fresno	CA	93711	6.25	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	10:00 AM - 07:00 PM	12:00 PM - 04:00 PM
J&L Check Cashing	2819 W Clinton Ste. 103	Fresno	CA	93722	4.4	08:30 AM - 07:00 PM	08:30 AM - 07:00 PM	08:30 AM - 07:00 PM	08:30 AM - 07:00 PM	08:30 AM - 07:00 PM	08:30 AM - 06:30 PM	10:00 AM - 04:00 PM

BusinessName	Address	City	State	Zip	Radius Distance To Local Office	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Quick Pick 2	5210 E. Olive Avenue	Fresno	CA	93727	3.75	10:00 AM - 05:00 PM	10:00 AM - 05:00 PM	10:00 AM - 05:00 PM	10:00 AM - 05:00 PM	10:00 AM - 05:00 PM	10:00 AM - 05:00 PM	Closed - Closed
El Campesino Meat Market	245 E Whitesbridge	Fresno	CA	93706	1.6	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM
The Postal Station & Mobile Page	4460 W. Shaw	Fresno	CA	93722	7.2	08:30 AM - 07:15 PM	08:30 AM - 07:15 PM	08:30 AM - 07:15 PM	08:30 AM - 07:15 PM	08:30 AM - 07:15 PM	08:30 AM - 04:15 PM	Closed - Closed
Tower Market	1233 N. Van Ness Ave	Fresno	CA	93728	1.9	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
Choice Food Market	2106 W. Olive	Fresno	CA	93728	3.4	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM
Zack's Market	854 E California Avenue	Fresno	CA	93706	1.4	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
TC Fresh Meat Supermarket	4790 E Belmont	Fresno	CA	93702	2.7	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM
Walmart #02985 (Fresno,Ingram)	7065 N Ingram	Fresno	CA	93650	7.3	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #01815 (Fresno,W Shaw)	4080 West Shaw	Fresno	CA	93711	6.84	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02001 (Fresno,Kings Cyn)	5125 E Kings Canyon	Fresno	CA	93727	3.26	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02277 (Clovis,Shaw)	323 West Shaw Ave.	Clovis	CA	93611	6.23	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Jiffy Food Store	5851 S Elm	Fresno	CA	93706	6.4	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM
La Hacienda Market (Fresno)	3131 E Mckinley	Fresno	CA	93703	2.18	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
Walmart #05632 (Fresno, Ashlan)	1804 E Ashlan Ave	Fresno	CA	93726	4.1	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02689 (Fresno,N. Cedar)	3131 North Cedar Ave	Fresno	CA	93703	3.1	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Lucky Market	2419 S Elm Ave	Fresno	CA	93726	1.6	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
Walmart #05634 (Fresno,Willow)	6855 N. Willow Avenue	Fresno	CA	93710	6.84	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05337 (Clovis,Herndon Ave)	1185 Herndon Ave	Clovis	CA	93611	8.64	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05701 (Kerman)	14061 W Whitesbridge Ave	Kerman	CA	93630	14.63	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05633 (Clovis,Shaw)	1830 Shaw	Clovis	CA	93611	7.36	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Sunnyside Bus. Center (Fresno)	5510 E Kings Canyon Ave	Fresno	CA	93727	4.6	09:00 AM - 04:30 PM	09:00 AM - 04:30 PM	09:00 AM - 04:30 PM	09:00 AM - 04:30 PM	09:00 AM - 04:30 PM	Closed - Closed	Closed - Closed
Freshco Food Center	3250 W Shields Ave	Fresno	CA	93722	5.57	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
Sunnyside Business Center (N.Fresno St)	1126 N Fresno	Fresno	CA	93701	1.5	09:00 AM - 05:30 PM	09:00 AM - 05:30 PM	09:00 AM - 05:30 PM	09:00 AM - 05:30 PM	09:00 AM - 05:30 PM	09:00 AM - 02:30 PM	Closed - Closed
A & M Market	10 E Whitesbridge	Fresno	CA	93706	1.8	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM
Simple Wireless	580 S Madera Ave	Kerman	CA	93630	15.48	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 05:00 PM
Herrera's Jewelry	1035 Fulton Mall	Fresno	CA	93721	0.55	09:00 AM - 05:30 PM	09:00 AM - 05:30 PM	09:00 AM - 05:30 PM	09:00 AM - 05:30 PM	09:00 AM - 05:30 PM	09:00 AM - 05:30 PM	09:00 AM - 05:30 PM
Jensen & Walnut Market	317 E Jensen Ave	Fresno	CA	93706	2.6	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
Fat Boy Market	1408 N Cedar Ave	Fresno	CA	93703	2.5	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM
Amigos Food Market	4220 E Church	Fresno	CA	93725	2.06	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM
Sunnyside Business Center (Jensen)	4131 E Jensen	Fresno	CA	93725	2.3	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	10:00 AM - 02:00 PM	Closed - Closed
Calif Check Cashing #559	3077 W. Shaw Ave., Ste 2	Fresno	CA	93711	6.18	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Calif Check Cashing #560	707 Shaw Ave.	Clovis	CA	93612	6.8	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Calif Check Cashing #568	3089 E. Shields Ave.	Fresno	CA	93726	3.19	09:00 AM - 06:00 PM	12:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	10:00 AM - 02:00 PM
Calif Check Cashing #588	4809 E.Kings Canyon Rd, Ste 102	Fresno	CA	93727	2.48	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
El Toro Loco (Fresno)	1405 W. Shields Avenue	Fresno	CA	93705	3.96	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM
Famco Food Center	1041 Tulare Street	Fresno	CA	93726	1.14	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
Branscomb Center Radio Shack	429 Maple Lane	Garberville	CA	95542	0.7	09:00 AM - 05:30 PM	09:00 AM - 05:30 PM	09:00 AM - 05:30 PM	09:00 AM - 05:30 PM	09:00 AM - 05:30 PM	10:00 AM - 05:00 PM	Closed - Closed
SPD Market Grass Valley	128 W. McKnight Way	Grass Valley	CA	95945	1.4	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	Closed - Closed	Closed - Closed
SPD Market Nevada City	735 Zion Street	Nevada City	CA	95959	3	07:00 AM - 06:00 PM	07:00 AM - 06:00 PM	07:00 AM - 06:00 PM	07:00 AM - 06:00 PM	07:00 AM - 06:00 PM	07:00 AM - 06:00 PM	07:00 AM - 06:00 PM
Colfax Market	2 North Main St	Colfax	CA	95713	10	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM
ACE #4054 - Hayward	27300 Hesperian Blvd.	Hayward	CA	94545	2	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 06:00 PM	Closed - Closed
El Rancho Supermercado	22291 Redwood Road	Castro Valley	CA	94546	3.77	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM
Walmart #05434 (San Leandro)	15555 Hesperian Boulevard	San Leandro	CA	94579	3.32	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02031 (Union City)	30600 Dyer Street	Union City	CA	94587	3.9	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02161 (Pleasanton)	4501 Rosewood Drive	Pleasanton	CA	94588	13.21	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05610 (San Ramon)	9100 Alcosta Blvd.	San Ramon	CA	94583	11.94	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05611 (Pleasanton - Santa Rita)	3112 Santa Rita Road	Pleasanton	CA	94566	13.64	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Cash 1 #283	255 A Street	Hayward	CA	94541	2.11	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	10:00 AM - 05:00 PM	10:00 AM - 02:00 PM
Calif Check Cashing #599	7301 Village Parkway	Dublin	CA	94568	11.64	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Calif Check Cashing #607	3105 Castro Valley Blvd	Castro Valley	CA	94546	4.18	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Calif Check Cashing #610	20500 Hesperian Blvd., Ste F	Hayward	CA	94541	1.58	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	10:00 AM - 04:00 PM	10:00 AM - 02:00 PM
Calif Check Cashing #618	15251 E. 14th Street, Ste A	San Leandro	CA	94578	4.24	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	10:00 AM - 05:00 PM	10:00 AM - 02:00 PM
Cardenas Market #211	187 Harder Road	Hayward	CA	94544	2.3	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM
Cardenas Market #201	20812 Hesperian Blvd.	Hayward	CA	94541	1.54	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM
ACE #4055 - Hollister	591 Tres Pino Road	Hollister	CA	95023	0.95	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Hollister Supermarket #2	211 Third Street	Hollister	CA	95023	0.2	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM
Walmart #02002 (Gilroy)	7150 Camino Arroyo	Gilroy	CA	95020	14	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Discotecos El Indito - (Gilroy)	291 1st St	Gilroy	CA	95020	14.3	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	Closed - Closed	Closed - Closed
Hollister Supermarket #1	1280 San Juan Rd	Hollister	CA	95023	1.2	06:00 AM - 08:00 PM	06:00 AM - 08:00 PM	06:00 AM - 08:00 PM	06:00 AM - 08:00 PM	06:00 AM - 08:00 PM	06:00 AM - 08:00 PM	06:00 AM - 08:00 PM
Windmill Market	301 The Alameda	San Juan Bautist	CA	95045	7.5	06:00 AM - 07:00 PM	06:00 AM - 07:00 PM	06:00 AM - 07:00 PM	06:00 AM - 07:00 PM	06:00 AM - 07:00 PM	06:00 AM - 07:00 PM	06:00 AM - 07:00 PM
Gilroy Valley Market	7237 Monterey Road	Gilroy	CA	95020	14.02	07:30 AM - 11:00 PM	07:30 AM - 11:00 PM	07:30 AM - 11:00 PM	07:30 AM - 11:00 PM	07:30 AM - 11:00 PM	07:30 AM - 11:00 PM	07:30 AM - 11:00 PM
Cardenas Market #220	727 First Street	Gilroy	CA	95020	15.15	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	Closed - Closed	Closed - Closed	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM
Walmart #02054 (Jackson,Wicklow)	10355 Wicklow Wy	Jackson	CA	95642	1.09	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Belinda & Steves Feed Seed and Supply	20200 Hwy 88	Pine Grove	CA	95665	8.9	07:00 AM - 07:00 PM	07:00 AM - 07:00 PM	07:00 AM - 07:00 PM	07:00 AM - 07:00 PM	07:00 AM - 07:00 PM	07:00 AM - 07:00 PM	08:00 AM - 04:00 PM
Calif Check Cashing #605	11960 Highway 88, Ste 3010	Jackson	CA	95642	0.79	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	10:00 AM - 02:00 PM	Closed - Closed
Los Amigos Food Center (San Joaquin)	8676 8th. Street	San Joaquin	CA	93660	11	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM
Sonora Wireless	1869 7th Street	Mendota	CA	93640	17.8	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM
EZ Wireless	429 Broadway St	King City	CA	93930	0.1	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM
98 Cents Plus Discount Store	425 Broadway Street	King City	CA	93930	0.15	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM
98 Cents Plus (Soledad)	431 Front St	Soledad	CA	93960	19	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM
Riverdale True Value Hardware	3478 Mt. Whitney Ave.	Riverdale	CA	93656	10.1	08:00 AM - 05:30 PM	08:00 AM - 05:30 PM	08:00 AM - 05:30 PM	08:00 AM - 05:30 PM	08:00 AM - 06:00 PM	09:00 AM - 04:00 PM	Closed - Closed

BusinessName	Address	City	State	Zip	Radius Distance To Local Office	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Maria's Fine Jewelry	308 W D Street	Lemoore	CA	93245	0.1	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:30 AM - 07:00 PM	Closed - Closed
Walmart #01645 (Hanford,12th Ave)	250 S. 12th Ave.	Hanford	CA	93230	6.2	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Royal Food	10990 14th ave	Armona	CA	93202	4.19	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
State Foods (Riverdale)	21282 N Marks Ave	Riverdale	CA	93656	9.55	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM
Lemoore Food Center	150 Cinnamon Dr.	Lemoore	CA	93245	0.4	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM
El Rey Supermercado	10833 Hanford Armona Road	Hanford	CA	93230	7.3	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM
Maria's Fine Jewelry - Hanford	1844 W. Lacey	Hanford	CA	93230	6.27	09:30 AM - 07:00 PM	09:30 AM - 07:00 PM	09:30 AM - 07:00 PM	09:30 AM - 07:00 PM	09:30 AM - 07:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM
Discoteca El Gallo	8 N. Cherokee Lane	Lodi	CA	95240	0.6	09:30 AM - 05:30 PM	09:30 AM - 05:30 PM	09:30 AM - 05:30 PM	09:30 AM - 05:30 PM	09:30 AM - 05:30 PM	09:30 AM - 04:00 PM	09:30 AM - 02:00 PM
Walmart #01789 (Lodi)	1600 Westgate Drive	Lodi	CA	95242	2.09	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #03352 (Stockton)	10355 Trinity Parkway	Stockton	CA	95219	7.86	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05231 (Galt)	10470 Twin Cities Road	Galt	CA	95632	10.6	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Calif Check Cashing #666	550 S. Cherokee Ln., Ste A	Lodi	CA	95240	0.83	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 03:00 PM	Closed - Closed
Pioneer Drug (Gustine)	397 5th Street	Gustine	CA	95322	4.2	09:30 AM - 04:30 PM	09:30 AM - 04:30 PM	09:30 AM - 04:30 PM	09:30 AM - 04:30 PM	09:30 AM - 04:30 PM	Closed - Closed	Closed - Closed
La Morenita Tortilleria (Los Banos)	705 W H Street	Los Banos	CA	93635	1.14	06:00 AM - 09:00 PM	06:00 AM - 09:00 PM	06:00 AM - 09:00 PM	06:00 AM - 09:00 PM	06:00 AM - 09:00 PM	06:00 AM - 09:00 PM	06:00 AM - 09:00 PM
Walmart #02117 (Los Banos,W Pacheco)	1575 West Pacheco Blvd	Los Banos	CA	93635	2.1	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
State Foods (Dos Palos)	2649 Blossom St	Dos Palos	CA	93620	12.3	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM
Newman Food Center	1046 Fresno Street	Newman	CA	95360	21.2	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
Calif Check Cashing #590	1060 E. Pacheco Blvd., Ste A	Los Banos	CA	93635	0.13	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Chowchilla Do It Best Hardware	408 Robertson Boulevard	Chowchilla	CA	93610	12.3	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM	09:00 AM - 05:00 PM
Latino Market	1291 O Street	Firebaugh	CA	93622	21	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
Central Valley Opportunity Center Madera	605 S. Gateway Drive	Madera	CA	93637	3.73	08:00 AM - 04:00 PM	08:00 AM - 04:00 PM	08:00 AM - 04:00 PM	08:00 AM - 04:00 PM	08:00 AM - 04:00 PM	Closed - Closed	Closed - Closed
Walmart #01583 (Madera,Cleveland)	1977 West Cleveland	Madera	CA	93637	1.84	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Food Fair Market	1100 N D Street	Madera	CA	93638	2.72	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM
State Foods (Madera Ranchos)	37405 Avenue 12	Madera	CA	93636	14.3	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM
State Foods (Chowchilla)	1315 Robertson Blvd	Chowchilla	CA	93610	13.1	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
Sunnyside Business Center (Firebaugh)	941 N Street	Firebaugh	CA	93622	21.5	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	10:00 AM - 03:00 PM	Closed - Closed
El Toro Loco #11 (Madera)	748 N. D Street	Madera	CA	93638	2.8	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM
Gateway Market La Estrella	518 South Gateway Drive	Madera	CA	93637	3.69	09:00 AM - 10:00 PM	09:00 AM - 10:00 PM	09:00 AM - 10:00 PM	09:00 AM - 10:00 PM	09:00 AM - 10:00 PM	09:00 AM - 10:00 PM	09:00 AM - 10:00 PM
Walmart #01840 (Manteca)	1205 South Main St.	Manteca	CA	95337	0.75	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Calif Check Cashing #651	358 N. Main Street	Manteca	CA	95336	0.38	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	10:00 AM - 05:00 PM	Closed - Closed
Calif Check Cashing #655	1330 W. Yosemite Avenue	Manteca	CA	95337	1.29	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Manteca Foods	447 N. Main Street	Manteca	CA	95336	0.53	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM
United Security Bank	40074 Hwy. 49	Oakhurst	CA	93644	20.42	09:00 AM - 04:30 PM	09:00 AM - 04:30 PM	09:00 AM - 04:30 PM	09:00 AM - 04:30 PM	09:00 AM - 04:30 PM	Closed - Closed	Closed - Closed
Mariposa TV	5069 Hwy 140	Mariposa	CA	95338	0.8	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	Closed - Closed	Closed - Closed
Corona's Video	413 5th Street	Arbuckle	CA	95912	26.57	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
ACE #4093 - Marysville	6000 Lindhurst Avenue	Marysville	CA	95901	1.4	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 05:00 PM	Closed - Closed
Walmart #01903 (Yuba City)	1150 Harter Road	Yuba City	CA	95993	3.6	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05136 (Marysville)	1131 North Beale Road	Marysville	CA	95901	1.1	08:00 AM - 08:00 AM	08:00 AM - 08:00 AM	08:00 AM - 08:00 AM	08:00 AM - 08:00 AM	08:00 AM - 08:00 AM	08:00 AM - 08:00 AM	10:00 AM - 06:00 AM
Cloverleaf Market (Olivehurst)	5780 Feather River Blvd	Marysville	CA	95961	1.35	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM
Discoteca Vallarta	637 Plumas Street	Yuba City	CA	95991	1.5	10:00 AM - 09:00 PM	10:00 AM - 09:00 PM	10:00 AM - 09:00 PM	10:00 AM - 09:00 PM	10:00 AM - 09:00 PM	10:00 AM - 09:00 PM	10:00 AM - 08:00 PM
ACE #4338 - 729 E St - Marysville	729 E St	Marysville	CA	95901	0.03	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 05:00 PM	Closed - Closed
El Toro Loco (Yuba City)	240 Garden Highway	Yuba City	CA	95991	1.26	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
Colusa Quick Serve Market	1234 Market Street	Colusa	CA	95932	23.69	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 03:00 PM	Closed - Closed
Calif Check Cashing #649	1222 Colusa Ave., Ste A	Yuba City	CA	95991	2.5	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	10:00 AM - 04:00 PM	Closed - Closed
El Toro Loco Market (Marysville)	1822 N. Beale Road	Marysville	CA	95901	2.26	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
Ranch Market	1912 Covillaud Street	Marysville	CA	95901	1.45	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
Bobbi's Liquors	2699 1st Street	Atwater	CA	95301	7.1	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
Central Valley Opportunity Center Winton	6838 Bridget Court	Winton	CA	95388	8.6	08:00 AM - 04:30 PM	08:00 AM - 04:30 PM	08:00 AM - 04:30 PM	08:00 AM - 04:30 PM	08:00 AM - 04:30 PM	Closed - Closed	Closed - Closed
Merced Lao Family Community	1748 Miles Ct Suite B	Merced	CA	95348	1.86	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	Closed - Closed	Closed - Closed
ACE #4047 - W Main, Merced	1340 W Olive Ave	Merced	CA	95348	0.46	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	09:00 AM - 05:00 PM	Closed - Closed
Winton SuperMarket	6592 N Winton Way	Winton	CA	95388	8.7	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
Walmart #02039 (Merced),Loughborough)	3055 Loughborough Dr.	Merced	CA	95348	1.1	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05890 (Atwater,Commerce Ave)	800 Commerce Ave	Atwater	CA	95301	7	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Choice Food Market (Merced)	836 T Street	Merced	CA	95340	1.9	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
Mercado Latino Market	318 Sutter St	Planada	CA	95365	8.64	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM
Merced Food Center	1150 Martin Luther King Jr Way	Merced	CA	95341	1.9	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM
Cardenas Market #223	1136 W Main Street	Merced	CA	95340	1.5	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM
Sams Foods Supermarket	351 Bellevue Road	Atwater	CA	95301	7.24	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
La Sonrisa Multiservicios (Winton)	6864 N. Winton Way	Winton	CA	95388	8.84	09:30 AM - 07:30 PM	09:30 AM - 07:30 PM	09:30 AM - 07:30 PM	09:30 AM - 07:30 PM	09:30 AM - 07:30 PM	10:00 AM - 04:00 PM	10:00 AM - 04:00 PM
La Sonrisa Multiservicios (Atwater)	337 East Bellevue Rd	Atwater	CA	95301	6.94	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Money Express Center #3	6195 Mission Street	Daly City	CA	94014	4.5	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM
Sunshine Center Pharmacy	1166 Old Mission Road	S. San Francisco	CA	94080	7	10:00 AM - 06:30 PM	10:00 AM - 06:30 PM	10:00 AM - 06:30 PM	10:00 AM - 06:30 PM	10:00 AM - 06:30 PM	10:00 AM - 01:30 PM	Closed - Closed
Check Cashing & Loans	687 Manor Dr	Pacifica	CA	94044	7.96	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 05:00 PM	Closed - Closed
Money Express Center	4601 Mission St	San Francisco	CA	94112	2.6	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	10:00 AM - 04:00 PM
U-Send Express (5483 Mission)	5483 Mission Street	San Francisco	CA	94112	7.52	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	10:00 AM - 04:00 PM
U-Send Express (2865 Mission)	2865 Mission Street	San Francisco	CA	94110	0.75	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 05:00 PM	Closed - Closed
Money Express Center #2	993 Shotwell Street	San Francisco	CA	94110	0.62	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM
Cash 1 #282	297 El Camino Real	San Bruno	CA	94066	9.78	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Calif Check Cashing #575	2531 Mission Street	San Francisco	CA	94110	0.42	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 05:00 PM	Closed - Closed
Calif Check Cashing #611	1310 East El Camino Real	San Bruno	CA	94066	8.41	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	10:00 AM - 04:00 PM	10:00 AM - 02:00 PM
Calif Check Cashing #621	5129 Mission Street	San Francisco	CA	94112	3.41	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed

BusinessName	Address	City	State	Zip	Radius Distance To Local Office	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Money Express Center #4	3001 Mission Street	San Francisco	CA	94110	0.89	09:00 AM - 07:30 PM	09:00 AM - 07:30 PM	09:00 AM - 07:30 PM	09:00 AM - 07:30 PM	09:00 AM - 07:30 PM	09:00 AM - 07:30 PM	09:00 AM - 06:00 PM
ACE #4619 - Valencia St SF	500 Valencia Street	San Francisco	CA	94103	0.47	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 07:00 PM	09:00 AM - 05:00 PM	Closed - Closed
ACE #4073 - Oakdale, Modesto	2508 Oakdale Road	Modesto	CA	95355	4.3	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 06:00 PM	Closed - Closed
Central Valley Opportunity Center Modesto	1801 H Street Suite A4	Modesto	CA	95354	2.2	09:00 AM - 04:00 PM	09:00 AM - 04:00 PM	09:00 AM - 04:00 PM	09:00 AM - 04:00 PM	09:00 AM - 04:00 PM	Closed - Closed	Closed - Closed
ACE #4072 - Standiford, Modesto	1320 Standiford Avenue, Suite E8	Modesto	CA	95350	2.5	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 05:00 PM	Closed - Closed
ACE #4064 - H St. Modesto	420 H Street	Modesto	CA	95354	2.2	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 06:00 PM	Closed - Closed
ACE #4062 - Mitchell, Ceres	2517 Mitchell Road, Suite B	Ceres	CA	95307	6.7	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 06:00 PM	Closed - Closed
Walmart #01587 (Modesto,Plaza Parkway)	2225 Plaza Parkway	Modesto	CA	95350	0.97	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #01983 (Ceres,Mitchell Rd)	3960 Mitchell Rd.	Ceres	CA	95307	8.26	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05710 (Modesto,McHenry Ave)	3848 McHenry Ave	Modesto	CA	95350	3.3	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #03046 (Modesto, Coffee Road)	1421 Coffee Road	Modesto	CA	95355	3.03	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Viva Meat Market	1350 Paradise Road	Modesto	CA	95351	3.91	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
Calif Check Cashing #680	1800 Prescott Rd., Ste 1A	Modesto	CA	95350	0.51	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	10:00 AM - 05:00 PM	10:00 AM - 02:00 PM
Calif Check Cashing #688	417 McHenry Avenue	Modesto	CA	95354	2.97	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Cash 1 #696	3440 McHenry Ave., Ste E2	Modesto	CA	95350	2.77	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Cardenas Market #208	1612 Crows Landing Road	Modesto	CA	95358	4.07	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM
Viva Market (Ceres)	2362 E. Whitmore Avenue	Ceres	CA	95307	7.21	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM
Viva Market (Modesto)	1500 Yosemite Blvd.	Modesto	CA	95351	3.54	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
ACE #4625 - Modesto	2800 McHenry Ave., Unit 3	Modesto	CA	95350	2.59	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 05:00 PM	Closed - Closed
All American Mail Ctr (Trancas St)	1370 Trancas St	Napa	CA	94558	2.25	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM	10:00 AM - 03:00 PM	Closed - Closed
Walmart #01651 (American Canyon)	7011 Main St.	American Canyo	CA	94503	9	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02925 (Napa)	681 Lincoln Ave.	Napa	CA	94559	0.3	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05609 (Vallejo)	701 Sereno Drive	Vallejo	CA	94589	12.1	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Calif Check Cashing #595	240 Tennessee St.	Vallejo	CA	94590	13.75	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	10:00 AM - 02:00 PM
ACE #4063 - East F St, Oakdale	1190 E. F Street	Oakdale	CA	95361	0.65	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 06:00 PM	Closed - Closed
Riverbank Food Center	6524 3rd Street	Riverbank	CA	95367	5.28	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM
New Oakland Pharmacy	388 Ninth Street, Suite 108	Oakland	CA	94607	0.37	09:00 AM - 03:00 PM	09:00 AM - 03:00 PM	09:00 AM - 03:00 PM	09:00 AM - 03:00 PM	09:00 AM - 03:00 PM	Closed - Closed	Closed - Closed
ACE #4076 - Oak (San Pablo Ave)	2700 San Pablo Avenue	Oakland	CA	94612	0.91	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 06:00 PM	Closed - Closed
Shoppers Market	2101 23rd Avenue	Oakland	CA	94606	2.57	08:30 AM - 10:00 PM	08:30 AM - 10:00 PM	08:30 AM - 10:00 PM	08:30 AM - 10:00 PM	08:30 AM - 10:00 PM	08:30 AM - 10:00 PM	08:30 AM - 10:00 PM
Calif Check Cashing #617	5101 Telegraph Avenue	Oakland	CA	94609	2.27	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	10:00 AM - 05:00 PM	Closed - Closed
Walmart #01575 (Oroville)	465 Cal Oak Road	Oroville	CA	95965	1.28	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Mac's Market	550 East Gridley Road	Gridley	CA	95948	11.3	07:00 AM - 06:00 PM	07:00 AM - 06:00 PM	07:00 AM - 06:00 PM	07:00 AM - 06:00 PM	07:00 AM - 06:00 PM	07:00 AM - 06:00 PM	Closed - Closed
Calif Check Cashing #660	1985 Oro Dam Blvd. East	Oroville	CA	95966	0.58	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Walmart #02418 (Placerville)	4300 Missouri Flat Road	Placerville	CA	95667	0.675	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Calif Check Cashing #659	384 Placerville Dr., Ste E	Placerville	CA	95667	2.47	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Walmart #01608(Red Bluff)	608 Luther Road	Red Bluff	CA	96080	0.3	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Solano St Liquor and Grocery	2013 Solano St	Corning	CA	96021	16.2	07:00 AM - 10:30 PM	07:00 AM - 10:30 PM	07:00 AM - 10:30 PM	07:00 AM - 10:30 PM	07:00 AM - 10:30 PM	07:00 AM - 10:30 PM	07:00 AM - 09:30 PM
Northstate Check Exchange (Redding)	2555 Bechelli Lane	Redding	CA	96002	5.7	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Walmart #05133 (Anderson)	5000 Rhonda Road	Anderson	CA	96007	4.74	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02537 (Redding)	1515 Dana Drive	Redding	CA	96003	5.96	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Hinkles Market	1084 Market St	Redding	CA	96001	7.5	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM
ACE #4087 - Richmond	2300 Cutting Blvd.	Richmond	CA	94804	0.59	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 07:00 PM	09:00 AM - 05:00 PM	Closed - Closed
Walmart #03455 (Richmond)	1400 Hilltop Mall Road	Richmond	CA	94806	4.36	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Cash 1 #284	203 San Pablo Town Center	San Pablo	CA	94806	2.71	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 02:00 PM	Closed - Closed
Calif Check Cashing #620	14375 San Pablo Avenue	San Pablo	CA	94806	3.41	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	10:00 AM - 05:00 PM	10:00 AM - 02:00 PM
Cardenas Market #213	2107 Solano Avenue	Vallejo	CA	94590	14.21	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	Closed - Closed	Closed - Closed	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM
Alvord Street Mini Mart	104 North Alvord	Ridgecrest	CA	93555	0.5	07:00 AM - 06:00 PM	07:00 AM - 06:00 PM	07:00 AM - 06:00 PM	07:00 AM - 06:00 PM	07:00 AM - 06:00 PM	07:00 AM - 06:00 PM	07:00 AM - 06:00 PM
Walmart #01600 (Ridgecrest)	201 E. Bowman Road	Ridgecrest	CA	93555	0.6	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Cactus Market	7021 California City Blvd	California City	CA	93505	32.7	07:00 AM - 11:00 PM	07:00 AM - 11:00 PM	07:00 AM - 11:00 PM	07:00 AM - 11:00 PM	07:00 AM - 11:00 PM	07:00 AM - 11:00 PM	07:00 AM - 11:00 PM
One Stop Market	501 N China Lake Blvd	Ridgecrest	CA	93555	1.1	06:00 AM - 09:00 PM	06:00 AM - 09:00 PM	06:00 AM - 09:00 PM	06:00 AM - 09:00 PM	06:00 AM - 09:00 PM	06:00 AM - 09:00 PM	06:00 AM - 09:00 PM
The Mailhouse	8139 Sunset Avenue	Fair Oaks	CA	95628	6.6	11:00 AM - 05:00 PM	11:00 AM - 05:00 PM	11:00 AM - 05:00 PM	11:00 AM - 05:00 PM	11:00 AM - 05:00 PM	10:30 AM - 03:00 PM	Closed - Closed
ACE #4094 - 5227 Elkhorn Blvd Sac	5227 Elkhorn Boulevard	Sacramento	CA	95842	5.9	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 06:00 PM	Closed - Closed
ACE #4098 - 4341 Elkhorn Blvd Sac	4341 Elkhorn Boulevard	Sacramento	CA	95842	6.4	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	09:00 AM - 06:00 PM	11:00 AM - 03:00 PM
Walmart #03712 (Citrus Heights)	7010 Auburn Blvd	Citrus Heights	CA	95621	4.17	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #01760 (Folsom)	1018 Riley St.	Folsom	CA	95630	7.76	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #04309 (Orangevale)	8961 Greenback Lane	Orangevale	CA	95662	5.26	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #01988 (Roseville)	900 Pleasant Grove Blvd.	Roseville	CA	95678	2.8	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #03587 (Rocklin)	5454 Crossings Drive	Rocklin	CA	95677	5.19	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05192 Sacramento (Antelope)	5821 Antelope Rd	Sacramento	CA	95842	4.51	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #01881 (City of Antelope)	7901 Watt Avenue	Antelope	CA	95843	7.23	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #04202 (Roseville/Lead Hill)	1400 Lead Hill Boulevard	Roseville	CA	95661	0.38	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
B Brothers	4847 Amber Ln	Sacramento	CA	95841	7.36	09:00 AM - 11:00 PM	09:00 AM - 11:00 PM	09:00 AM - 11:00 PM	09:00 AM - 11:00 PM	09:00 AM - 11:00 PM	09:00 AM - 11:00 PM	09:00 AM - 11:00 PM
Walmart #05979 (Lincoln Neighborhood Store)	255 G St.	Lincoln	CA	95648	9.7	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05980 (Granite Bay Neighborhood Store)	4080 Douglas Blvd	Granite Bay	CA	95746	2.2	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #03090 (Rocklin)	5609 Pacific Street	Rocklin	CA	95677	2.96	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Cash 1 #270	5363 Auburn Blvd	Sacramento	CA	95841	6.73	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	09:00 AM - 06:00 PM
Calif Check Cashing #652	5949 Watt Avenue	North Highlands	CA	95660	8.09	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 05:00 PM	11:00 AM - 04:00 PM
Calif Check Cashing #678	6178 Auburn Blvd.	Citrus Heights	CA	95621	5.55	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Calif Check Cashing #675	820 Sunrise Avenue	Roseville	CA	95661	1.07	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 09:00 PM	09:00 AM - 06:00 PM	Closed - Closed
ACE #4097 - Carmichael	7250 Fair Oaks Boulevard, Ste. F	Carmichael	CA	95609	8.1	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 06:00 PM	Closed - Closed
ACE #4258 - Valley Hi Sac	6640 Valley Hi Drive	Sacramento	CA	95823	4.1	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	Closed - Closed

BusinessName	Address	City	State	Zip	Radius Distance To Local Office	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Fastrip Food Store	8061 Florin Road	Sacramento	CA	95828	2.3	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 05:00 PM	Closed - Closed
Welco Supermarket	7100 Fruitridge Road	Sacramento	CA	95820	1.6	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	Closed - Closed
Choice Gas & Check Cashing (Sacramento)	7900 Fruitridge Rd	Sacramento	CA	95820	1	06:00 AM - 10:00 PM	06:00 AM - 10:00 PM	06:00 AM - 10:00 PM	06:00 AM - 10:00 PM	06:00 AM - 10:00 PM	06:00 AM - 10:00 PM	06:00 AM - 10:00 PM
Florin Shell	8062 Florin Road	Sacramento	CA	95828	2.81	06:00 AM - 11:00 PM	06:00 AM - 11:00 PM	06:00 AM - 11:00 PM	06:00 AM - 11:00 PM	06:00 AM - 11:00 PM	06:00 AM - 11:00 PM	06:00 AM - 11:00 PM
Walmart #02457 (Rancho Cordova)	10655 Folsom Blvd.	Rancho Cordova	CA	95670	7.1	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02735 (Sacramento)	6051 Florin	Sacramento	CA	95823	3.1	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #01697 (Elk Grove)	8465 Elk Grove Blvd.	Elk Grove	CA	95758	8.14	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
ACE #4219 - 8391 Folsom Blvd	8391 Folsom Blvd., Ste 2	Sacramento	CA	95826	1.29	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 06:00 PM	Closed - Closed
Walmart #04759 (Citrus Heights)	6197 Sunrise Blvd.	Citrus Heights	CA	95610	12.5	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #04393 (Watt Ave/Sacramento)	4675 Watt Avenue	North Highlands	CA	95660	8.6	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #06530 (Sacramento/Florin)	4420 Florin Road	Sacramento	CA	95823	4.01	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #03081 (Sacramento, Gerber Road)	8915 Gerber Road	Sacramento	CA	95829	3.3	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05982 (Sacramento)	2700 Marconi Ave	Sacramento	CA	95821	6.26	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05683 (Elk Grove Neighborhood Store)	8455 Elk Grove Blvd	Elk Grove	CA	95758	7.9	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05981 (Carmichael Neighborhood Store)	6005 Madison Ave	Carmichael	CA	95608	9.9	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05848 (Elk Grove - Bruceville)	10075 Bruceville Rd	Elk Grove	CA	95757	8.64	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Mi Rancho Supermarket - Sacramento	2355 Florin Road	Sacramento	CA	95822	5.42	09:00 AM - 06:30 PM	09:00 AM - 06:30 PM	09:00 AM - 06:30 PM	09:00 AM - 06:30 PM	09:00 AM - 06:30 PM	09:00 AM - 06:30 PM	09:00 AM - 06:30 PM
Mi Rancho Supermarket - Rancho Cordova	10669 Coloma Road	Rancho Cordova	CA	95670	7.8	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM
Walmart #02464-Sacramento	8270 Delta Shores Circle	Sacramento	CA	95832	7.23	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM
Calif Check Cashing #677	2126 El Camino Avenue	Sacramento	CA	95821	5.97	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 03:00 PM	Closed - Closed
NEO Technology Inc	4220 Florin Rd., Ste. 102	Sacramento	CA	95823	4.21	11:00 AM - 05:00 PM	Closed - Closed	11:00 AM - 05:00 PM	11:00 AM - 05:00 PM	11:00 AM - 05:00 PM	11:00 AM - 05:00 PM	11:00 AM - 05:00 PM
Calif Check Cashing #596	6154 Florin Road	Sacramento	CA	95833	3.17	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 03:00 PM	10:00 AM - 01:00 PM
Calif Check Cashing #668	2808 Zinfandel Drive, Suite B	Rancho Cordova	CA	95670	7.27	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 07:00 PM	10:00 AM - 03:00 PM	Closed - Closed
Calif Check Cashing #672	1290 Fulton Avenue	Sacramento	CA	95825	4.35	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 05:00 PM	Closed - Closed
Calif Check Cashing #667	2815 Florin Road	Sacramento	CA	95822	5.02	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 07:00 PM	10:00 AM - 03:00 PM	Closed - Closed
Cash 1 #265	4550 Mack Road	Sacramento	CA	95823	4.84	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	09:00 AM - 06:00 PM
Viva Supermarket (Marysville Blvd)	3845 Marysville Blvd	Sacramento	CA	95834	7.99	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
Viva Supermarket (Rancho)	10385 Folsom Blvd	Rancho Cordova	CA	95670	6.42	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
ACE #4618 - El Camino Sacto	2202 El Camino Ave.	Sacramento	CA	95821	5.92	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	Closed - Closed
ACE #4620 - Florin Rd Sacto	6510 Florin Road	Sacramento	CA	95828	2.93	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 07:00 PM	09:00 AM - 04:00 PM	Closed - Closed
C.M.T. Travel	930 N. Sanborn Rd.	Salinas	CA	93905	1.66	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 05:00 PM	Closed - Closed
Walmart #02458 (Salinas)	1800 N. Main Street	Salinas	CA	93906	3.2	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #04488 (Marina)	150 Beach Road	Marina	CA	93933	8.77	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05751 (Salinas)	1375 N. Davis Road	Salinas	CA	93907	2.77	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
La Morenita Tortilleria & Meat Mkt	1876 Fremont Blvd.	Seaside	CA	93955	11.5	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
Brisas Multiservicios	10694 Merritt St	Castroville	CA	95012	9.05	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 03:00 PM
Station Wireless	153 Country Club Gate Center	Pacific Grove	CA	93950	16.1	11:00 AM - 03:00 PM	11:00 AM - 03:00 PM	11:00 AM - 03:00 PM	11:00 AM - 03:00 PM	Closed - Closed	Closed - Closed	Closed - Closed
Calif Check Cashing #554	45 S. Sanborn Rd., Ste E	Salinas	CA	93905	0.97	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Calif Check Cashing #582	1760 Fremont Blvd., Suite H2	Seaside	CA	93955	11.84	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 02:00 PM	Closed - Closed
Cardenas Market #205	950 E. Alisal Street	Salinas	CA	93905	0.84	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM
PAL Market	2398 University Avenue	E. Palo Alto	CA	94303	7	09:00 AM - 10:00 PM	09:00 AM - 10:00 PM	09:00 AM - 10:00 PM	09:00 AM - 10:00 PM	09:00 AM - 10:00 PM	09:00 AM - 10:00 PM	09:00 AM - 10:00 PM
More for Less (Half Moon Bay)	501 Kelly Avenue	Half Moon Bay	CA	94019	9.85	06:00 AM - 02:00 PM	06:00 AM - 02:00 PM	06:00 AM - 02:00 PM	06:00 AM - 02:00 PM	06:00 AM - 02:00 PM	06:00 AM - 02:00 PM	06:00 AM - 02:00 PM
Video Loco Musical	132 N B Street	San Mateo	CA	94401	5	10:00 AM - 08:45 PM	10:00 AM - 08:45 PM	10:00 AM - 08:45 PM	10:00 AM - 08:45 PM	10:00 AM - 08:45 PM	10:00 AM - 08:45 PM	10:00 AM - 07:00 PM
Soleska Market	1305 Willow Road	Menlo Park	CA	94025	6.42	06:30 AM - 07:30 PM	06:30 AM - 07:30 PM	06:30 AM - 07:30 PM	06:30 AM - 07:30 PM	06:30 AM - 07:30 PM	06:30 AM - 07:30 PM	06:30 AM - 07:30 PM
Calif Check Cashing #564	610 S. Norfolk St.	San Mateo	CA	94401	4.55	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	09:00 AM - 07:00 PM	10:00 AM - 07:00 PM	Closed - Closed
Cardenas Markets #215	1731 E. Bayshore Road	E. Palo Alto	CA	94303	7.84	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM
Assoc. Students Gen. Svc. Ctr.	1 Washington Square	San Jose	CA	95112	0.92	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	Closed - Closed	Closed - Closed
Bonfare Market #12-San Jose	2907 The Villages Parkway	San Jose	CA	95135	8.9	06:00 AM - 08:00 PM	06:00 AM - 08:00 PM	06:00 AM - 08:00 PM	06:00 AM - 08:00 PM	06:00 AM - 08:00 PM	06:00 AM - 08:00 PM	06:00 AM - 08:00 PM
Money Mkt. Fin. Svcs.-San Jose	876 The Alameda	San Jose	CA	95126	0.64	09:30 AM - 06:30 PM	09:30 AM - 06:30 PM	09:30 AM - 06:30 PM	09:30 AM - 06:30 PM	09:30 AM - 06:30 PM	10:00 AM - 06:30 PM	Closed - Closed
Willow Market	215 Willow Street	San Jose	CA	95110	1.36	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 04:00 PM	Closed - Closed
Walmart #05884 (San Jose/Almaden Expy)	5095 Almaden Expressway	San Jose	CA	95118	5.63	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05766 (Morgan Hill)	170 Cochrane Plaza	Morgan Hill	CA	95037	18.2	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05435 (San Jose)	777 Story Road	San Jose	CA	95122	2.15	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Thien Truc (San Jose)	2396 Senter Rd	San Jose	CA	95112	3.27	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM
Walmart #04174 (San Jose)	1450 Monterey Road	San Jose	CA	95112	1.89	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #03023 (San Jose)	4055 Evergreen Village Square	San Jose	CA	95135	6.69	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Discoteca El Indito - (San Jose)	2261 Story Rd	San Jose	CA	95122	3.58	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
Calif Check Cashing #547	2417 Alvin Avenue	San Jose	CA	95121	3.71	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	10:00 AM - 03:00 PM	Closed - Closed
Calif Check Cashing #548	4156 Monterey Hwy., Ste 30	San Jose	CA	95111	4.92	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	10:00 AM - 04:00 PM	10:00 AM - 02:00 PM
Calif Check Cashing #553	2151 Story Road	San Jose	CA	95122	3.36	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	10:00 AM - 04:00 PM	10:00 AM - 02:00 PM
Calif Check Cashing #556	1075 S White Rd., Ste 90	San Jose	CA	95127	4.42	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	10:00 AM - 03:00 PM	Closed - Closed
Calif Check Cashing #562	14706 Camden Avenue	San Jose	CA	95124	5.21	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 07:00 PM	10:00 AM - 02:00 PM	Closed - Closed
Cash 1 #563	3826 Seven Trees Blvd., Ste 100	San Jose	CA	95111	4.69	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 02:00 PM	Closed - Closed
Calif Check Cashing #565	2471 Berryessa Rd., Ste 5	San Jose	CA	95133	4.15	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	10:00 AM - 04:00 PM	10:00 AM - 02:00 PM
Calif Check Cashing #578	1304 S. Winchester Blvd., Ste 102	San Jose	CA	95128	3.74	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 03:00 PM	Closed - Closed
Calif Check Cashing #580	1720 W.San Carlos Street	San Jose	CA	95128	1.7	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Cardenas Market #212	320 N. Capitol Avenue	San Jose	CA	95133	10.24	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM
Cardenas Market #204	1745 Story Road	San Jose	CA	95122	2.88	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM
Cardenas Market #203	235 E. Julian Street	San Jose	CA	95112	0.83	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM
Cardenas Market #222	1070 S. White Road	San Jose	CA	95127	4.54	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM
Anything Goes	811 Spring Street	Paso Robles	CA	93446	24	09:30 AM - 05:00 PM	09:30 AM - 05:00 PM	09:30 AM - 05:00 PM	09:30 AM - 05:00 PM	09:30 AM - 05:00 PM	10:00 AM - 12:00 PM	Closed - Closed

BusinessName	Address	City	State	Zip	Radius Distance To Local Office	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Carniceria La Bonita	1000 W. Main Street	Santa Maria	CA	93458	26	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM
Super Carniceria La Chiquita (Lom)	880 W. Laurel Avenue	Lompoc	CA	93436	45	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM
El Camino Liquor	602 W. Main	Santa Maria	CA	93458	25.7	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM	09:00 AM - 09:00 PM
Walmart #02556 (Arroyo Grande, Branch)	1168 W Branch Street	Arroyo Grande	CA	93420	11	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #01989 (Lompoc,Central)	701 W Central Ave.	Lompoc	CA	93436	45.4	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02099 (Paso Robles, Niblick)	180 Niblick Rd.	Paso Robles	CA	93446	24.5	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02507 (Santa Maria,S Bradley)	2220 South Bradley	Santa Maria	CA	93455	28.2	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
La Mexicana Market	1920 Creston Rd # D	Paso Robles	CA	93446	28	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM
Super Carniceria La Chiquita (Nipomo)	170 S Thompson Ave	Nipomo	CA	93444	19.3	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM
Bill Senna Insurance Agency	1404 E Grand Ave	Arroyo Grande	CA	93420	11.3	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	08:00 AM - 05:00 PM	Closed - Closed	Closed - Closed
Guadalajara Meat Market	1400 W Grand Ave	Grover Beach	CA	93433	10.5	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM
Walmart #05658 (Santa Maria, Bradley Road)	2240 South Bradley Road	Santa Maria	CA	93454	28.2	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05659 (Santa Maria)	500 S. Blosser Road	Santa Maria	CA	93458	25.2	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
La Favorita Market #3 (Santa Maria)	1711 S Broadway Ave	Santa Maria	CA	93454	26.8	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
La Favorita Market #5 (Santa Maria)	1635 N Broadway Ave	Santa Maria	CA	93454	25.3	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
Northbay Check Cashing	926 Grant Avenue	Novato	CA	94947	9.75	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 07:00 PM	09:00 AM - 04:30 PM	Closed - Closed
Envios America-San Rafael	151 Bellam Blvd.	San Rafael	CA	94901	1.4	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 08:00 PM	07:00 AM - 07:00 PM	09:00 AM - 05:00 PM
Cardenas Market #216	330 Bellam Blvd.	San Rafael	CA	94901	1.66	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	Closed - Closed	Closed - Closed	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM
UpValley Family Centers	1440 Spring Street	St. Helena	CA	94574	16.2	10:00 AM - 04:00 PM	10:00 AM - 04:00 PM	10:00 AM - 04:00 PM	10:00 AM - 04:00 PM	10:00 AM - 04:00 PM	Closed - Closed	Closed - Closed
Walmart #01755 (Rohnert Park)	4625 Redwood Drive	Rohnert Park	CA	94928	5.3	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02553 (Windsor)	6650 Hembree Lane	Windsor	CA	95492	6.3	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
More for Less #21 (Calistoga)	940 Petrified Forest	Calistoga	CA	94515	12.3	07:00 AM - 11:00 PM	07:00 AM - 11:00 PM	07:00 AM - 11:00 PM	07:00 AM - 11:00 PM	07:00 AM - 11:00 PM	07:00 AM - 11:00 PM	07:00 AM - 11:00 PM
Walmart #02468 (Rohnert Park/Golf Course Dr)	901 Golf Course Drive	Rohnert Park	CA	94928	5.95	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Calif Check Cashing #591	153 Southwest Blvd	Rohnert Park	CA	94928	7.49	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	09:00 AM - 06:00 PM	10:00 AM - 02:00 PM	Closed - Closed
Calif Check Cashing #593	1017 Steele Lane	Santa Rosa	CA	95403	1.75	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	10:00 AM - 02:00 PM
Valley Foods Super Market (Car)	2259 West Tahoe Avenue	Caruthers	CA	93609	12.1	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM	08:00 AM - 09:30 PM
Sunnyside Business Center (Parlier)	690 Fresno Street	Parlier	CA	93648	6.26	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	09:00 AM - 05:00 PM	Closed - Closed	Closed - Closed
Mighty Mart #1	466 Academy Avenue	Sanger	CA	93657	10.47	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM	08:00 AM - 10:00 PM
Gong's Market - Southgate	1825 Academy Avenue	Sanger	CA	93657	9.27	07:30 AM - 08:30 PM	07:30 AM - 08:30 PM	07:30 AM - 08:30 PM	07:30 AM - 08:30 PM	07:30 AM - 08:30 PM	07:30 AM - 08:30 PM	07:30 AM - 08:30 PM
Joyeria Herrera's (Selma)	2404 McCall	Selma	CA	93662	0.4	09:30 AM - 07:30 PM	09:30 AM - 07:30 PM	09:30 AM - 07:30 PM	09:30 AM - 07:30 PM	09:30 AM - 07:30 PM	09:30 AM - 07:30 PM	09:30 AM - 05:00 PM
Walmart #01882 (Selma,Floral Ave)	3400 Floral	Selma	CA	93662	1.24	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #04238 (Sanger,Jensen)	2761 Jensen Ave	Sanger	CA	93657	9.9	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Joyeria Herrera's (Parlier)	13669 E Manning Ave Ste 101	Parlier	CA	93648	5.5	09:30 AM - 07:00 PM	09:30 AM - 07:00 PM	09:30 AM - 07:00 PM	09:30 AM - 07:00 PM	09:30 AM - 07:00 PM	09:30 AM - 07:00 PM	09:30 AM - 05:00 PM
United Market (Selma)	3736 McCall Ave	Selma	CA	93662	1.69	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
State Foods (Parlier)	553 S Newark	Parlier	CA	93648	5.48	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
State Foods Supermarket (Sanger)	237 Academy Ave	Sanger	CA	93657	10.62	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
Walmart #02030 (Sonora,Sanguinetti Rd)	1101 Sanguinetti Rd	Sonora	CA	95370	2.6	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
ACE #4623 - Sonora	13759 Mono Way	Sonora	CA	95370	1.27	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 04:00 PM	Closed - Closed
Blomberg & Griffin AC	1013 N. California Street	Stockton	CA	95202	0.6	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM	08:00 AM - 06:00 PM	09:00 AM - 04:00 PM	Closed - Closed
City Paypoint	2650 Monte Diablo Avenue, #2	Stockton	CA	95203	2.5	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 05:00 PM	10:00 AM - 05:00 PM
ACE #4272 - E.March, Stockton	1616 E. March Lane	Stockton	CA	95210	3.22	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	09:00 AM - 06:00 PM	Closed - Closed
Circle 7 Food Store	2339 Portola Avenue	Stockton	CA	95209	6.07	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM
Walmart #01554 (Stockton)	3223 East Hammer Lane	Stockton	CA	95212	4.63	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #03022 (Stockton/March Ln)	1189 E. March Lane	Stockton	CA	95210	3.26	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Miracle Mile Market	244 W. Harding Way	Stockton	CA	95204	0.98	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 07:00 PM	08:00 AM - 06:00 PM
Calif Check Cashing #646	6231 Pacific Avenue	Stockton	CA	95207	3.96	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	10:00 AM - 04:00 PM	10:00 AM - 03:00 PM
Calif Check Cashing #647	678 N. Wilson Way, Ste 39	Stockton	CA	95205	1.1	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Calif Check Cashing #648	1012 W. Hammer Lane	Stockton	CA	95209	4.94	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 03:00 PM	Closed - Closed
Calif Check Cashing #650	2638 Waterloo Road	Stockton	CA	95205	2.24	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Calif Check Cashing #665	353 MLK Jr. Blvd., Ste A	Stockton	CA	95206	1.18	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	09:00 AM - 08:00 PM	10:00 AM - 05:00 PM	10:00 AM - 02:00 PM
ACE #4624 - Pacific Ave Stockton	2002 Pacific Avenue	Stockton	CA	95204	1.26	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 07:00 PM	09:00 AM - 04:00 PM	Closed - Closed
Family Food Mart	138 E. 1st Street	Buttonwillow	CA	93206	18.04	08:00 AM - 08:30 PM	08:00 AM - 08:30 PM	08:00 AM - 08:30 PM	08:00 AM - 08:30 PM	08:00 AM - 08:30 PM	08:00 AM - 08:30 PM	08:00 AM - 08:30 PM
El Toro Loco Market (Lost Hills)	21315 Hwy 46	Lost Hills	CA	93259	35.82	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM	07:00 AM - 10:00 PM
Walmart #02025 (Tracy)	3010 W. Grantline Rd.	Tracy	CA	95304	2.77	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
ACE #4284 - Tracy	1296 W. 11th	Tracy	CA	95376	0.92	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 07:00 PM	09:00 AM - 05:00 PM	Closed - Closed
Sunset Liquor, Inc	2355 Parker Ave	Tracy	CA	95376	1.08	07:00 AM - 01:00 AM	07:00 AM - 01:00 AM	07:00 AM - 01:00 AM	07:00 AM - 01:00 AM	07:00 AM - 02:00 AM	07:00 AM - 02:00 AM	07:00 AM - 01:00 AM
Norcal Liquors	1162 N Tracy Blvd	Tracy	CA	95376	0.66	07:00 AM - 01:00 AM	07:00 AM - 01:00 AM	07:00 AM - 01:00 AM	07:00 AM - 01:00 AM	07:00 AM - 01:00 AM	07:00 AM - 02:00 AM	07:00 AM - 01:00 AM
Calif Check Cashing #656	701 W. 11th Street	Tracy	CA	95376	0.67	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	10:00 AM - 05:00 PM	10:00 AM - 02:00 PM
Pioneer Drug (Newman)	1261 Main Street	Newman	CA	95360	15.6	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	10:00 AM - 06:00 PM	09:00 AM - 01:00 PM	Closed - Closed
ACE #4056 - Countryside, Turlock	1825 Countryside Drive	Turlock	CA	95380	2	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 06:00 PM	Closed - Closed
Livingston Liberty Market	1471 B Street	Livingston	CA	95334	10	09:00 AM - 06:30 PM	09:00 AM - 06:30 PM	09:00 AM - 06:30 PM	09:00 AM - 06:30 PM	09:00 AM - 06:30 PM	Closed - Closed	Closed - Closed
Postal Center USA	2930 Geer Rd	Turlock	CA	95382	1.64	07:45 AM - 07:00 PM	07:45 AM - 07:00 PM	07:45 AM - 07:00 PM	07:45 AM - 07:00 PM	07:45 AM - 07:00 PM	08:00 AM - 05:00 PM	Closed - Closed
Walmart #01963 (Turlock,Fulkerth Rd)	2111 Fulkerth Rd	Turlock	CA	95380	1.64	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Patterson Food Center	200 N 2nd Street	Patterson	CA	95363	15.6	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM
Walmart #05843 (Patterson,Sperry)	1030 Sperry Avenue	Patterson	CA	95363	16.2	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #03047 (Turlock Greer Rd)	2480 Geer Road	Turlock	CA	95380	1.37	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Rancho Patterson Foods	125 S El Circulo	Patterson	CA	95363	15.8	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	10:00 AM - 05:00 PM	10:00 AM - 04:00 PM
La Sonrisa Multiservicios (Turlock)	400 Lander Avenue	Turlock	CA	95380	0.48	09:00 AM - 07:30 PM	09:00 AM - 07:30 PM	09:00 AM - 07:30 PM	09:00 AM - 07:30 PM	09:00 AM - 07:30 PM	10:00 AM - 04:00 PM	Closed - Closed
Walmart #02052 (Ukiah)	1155 Airport Park Blvd.	Ukiah	CA	95482	3.65	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Depot Food and Liquor	891 Markham Ave	Vacaville	CA	95688	0.1	06:00 AM - 02:00 AM	06:00 AM - 02:00 AM	06:00 AM - 02:00 AM	06:00 AM - 02:00 AM	06:00 AM - 02:00 AM	06:00 AM - 02:00 AM	06:00 AM - 02:00 AM
Walmart #05139 (Dixon)	235 East Dorset Dr.	Dixon	CA	95620	12.02	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM

BusinessName	Address	City	State	Zip	Radius Distance To Local Office	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Walmart #02048 (Fairfield)	2701 N. Texas Street	Fairfield	CA	94534	9.96	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #01704 (Vacaville)	1501 Helen Power Drive	Vacaville	CA	95843	1.45	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #03708 (Suisun City)	350 Walters Drive	Suisun City	CA	94585	7.35	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
La Charrita Market	1470 West Texas Street	Fairfield	CA	94533	8.09	08:30 AM - 09:30 PM	08:30 AM - 09:30 PM	08:30 AM - 09:30 PM	08:30 AM - 09:30 PM	08:30 AM - 09:30 PM	08:30 AM - 09:30 PM	08:30 AM - 09:00 PM
Walmart #05608 (Vacaville)	941 Alamo Drive	Vacaville	CA	95687	1.13	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #05007 (Vacaville)	2050 Nut Tree Road	Vacaville	CA	95687	1.42	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Panaderia Azteca	823 N. Adams Street	Dixon	CA	95620	11.05	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 07:30 PM	08:00 AM - 05:00 PM	Closed - Closed
Calif Check Cashing #662	135 Peabody Road	Vacaville	CA	95687	0.5	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Rio Linda Hardware	6748 Front Street	Rio Linda	CA	95673	10.45	08:00 AM - 04:00 PM	08:00 AM - 04:00 PM	08:00 AM - 04:00 PM	08:00 AM - 04:00 PM	08:00 AM - 04:00 PM	Closed - Closed	Closed - Closed
Walmart #03652 (West Sac)	755 Riverpoint	West Sacrament	CA	95605	2.23	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #02598 (Sacramento/Truxel)	3661 Truxel Road	Sacramento	CA	95833	4.11	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
ACE #4216 - 4110 Norwood	4110 Norwood, Ste 400	Sacramento	CA	95838	7.48	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	09:00 AM - 06:00 PM	Closed - Closed
Kings Supermarket	400 El Camino Avenue	Sacramento	CA	95815	5.68	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 06:00 PM	09:00 AM - 04:00 PM	Closed - Closed
Cash 1 #267	1600 W. El Camino Ave.	Sacramento	CA	95833	4.5	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Calif Check Cashing #654	2433 Northgate Blvd.	Sacramento	CA	95833	5.13	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 07:00 PM	09:00 AM - 08:00 PM	10:00 AM - 04:00 PM	Closed - Closed
Calif Check Cashing #670	2800 Broadway	Sacramento	CA	95817	3.46	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	09:00 AM - 05:00 PM	10:00 AM - 04:00 PM
Viva Supermarket (Norwood)	4211 Norwood Avenue	Sacramento	CA	95834	7.55	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM	07:00 AM - 09:00 PM
Walmart #02190 (Woodland)	1720 E. Main Street	Woodland	CA	95776	2.5	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Ez2 Cash	56 W. Court Street	Woodland	CA	95695	0.763	10:00 AM - 06:30 PM	10:00 AM - 06:30 PM	10:00 AM - 06:30 PM	10:00 AM - 06:30 PM	10:00 AM - 06:30 PM	10:00 AM - 06:30 PM	10:00 AM - 04:00 PM
Walmart #05606 (Woodland)	1250 East Gibson Road	Woodland	CA	95776	2.13	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
Walmart #04127 (Woodland Neighborhood Market)	215 California Street	Woodland	CA	95695	0	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	08:00 AM - 08:00 PM	10:00 AM - 06:00 PM
El Pasito	825 East Street, Suite 114	Woodland	CA	95776	1.64	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 07:00 PM	10:00 AM - 05:00 PM	Closed - Closed
Valley Food Market	17343 Fremont Street	Esparto	CA	95627	12.79	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM	08:00 AM - 09:00 PM

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT B

COMMUNITY-BASED ORGANIZATIONS (CBO)

Organization Name	Address	Primary Languages Supported	Program	TOTAL CARE Applications Received	New CARE Enrollments	TOTAL FERA Applications Received	New FERA Enrollments	TOTAL ESA Applications Received	New ESA Enrollments
Amador-Tuolumne Community Action Agency	10590 Hwy. 88, Jackson, CA 95642	English Spanish	CARE Capitation (COC)	13	7	0	0		
American GI Forum (AGIF) Education Foundation	702 East El Camino Street, Santa Maria, CA 93454	English Spanish	CARE Capitation (COC)	23	7	0	0		
Asian American Pacific Islander Coalition of the North Bay	1136 Baird Rd., Santa Rosa, CA 95409	English Chinese Korean Japanese Vietnamese Tagalog	CARE Capitation (COC)	0	0	0	0		
Bay Area Community Health	2726 Aborn Rd Ste 207, San Jose, CA 95121	English Spanish	CARE Capitation (COC)	0	0	0	0		
Breathe CA	1469 Park Avenue, San Jose, CA 95126	English Spanish Chinese Vietnamese Tagalog Korean Hindi Russian Arabic Farsi	CARE Capitation (COC)	2	1	0	0		
CATHOLIC CHARITIES DIOCESE of Fresno	149 N. Fulton St., Fresno, CA 93701	English Spanish	CARE Capitation (COC)	8	2				
Catholic Charities of the East Bay	433 Jefferson St, Oakland, CA 94607	English Spanish	CARE Capitation (COC)	5	4	0	0		
Central Coast Energy Services, Inc.	P.O. Box 2707, Watsonville, CA 95077	English Spanish Chinese	CARE Capitation (COC)	657	220	2	1		
Moncada Outreach	21 Belle Ave #6, San Alsemo, CA 94960	English Spanish	CARE Capitation (COC)	381	235	8	8		
Chacon Systems, Inc.	841 VINCI WAY, Livermore, CA 94550	English Spanish	CARE Capitation (COC)	34	33	0	0		
Child Abuse Prevention Council of San Joaquin County	127 N Sutter Street, Stockton, CA 95202	English Spanish	CARE Capitation (COC)	2	1	0	0		
Community Action Marin (CA Marin)	555 Northgate Dr Ste #201, San Rafael, CA 94903	English Spanish Vietnamese Urdu	CARE Capitation (COC)	1	0	0	0		
Community Action Partnership of Madera County (CAP Madera)	1225 W Gill Avenue, Madera, CA 93637	English Spanish	CARE Capitation (COC)	87	28	0	0		
Community Resource Project Inc	250 HARRIS AVE, Sacramento, CA 95838	English Spanish	CARE Capitation (COC)	270	208	0	0		
Dignity Health Connected Living	200 Mercy Oaks Drive, Redding, CA 96003	English Spanish	CARE Capitation (COC)	6	3	0	0		
Eden I&R	570 B Street, Hayward, CA 94541	English Spanish	CARE Capitation (COC)	16	5	0	0		
El Puente Comunitario	24650 Amador Street, #59, Hayward, CA 94544	English Spanish	CARE Capitation (COC)	14	3	1	1		
Fresno Economic Opportunities Commision (Fresno EOC)	1900 Mariposa Street, Suite 260, Fresno, CA 93721	English Spanish	CARE Capitation (COC)	24	10	0	0		
Independent Living Center of Kern County Inc	5251 Office Park Drive, Suite 200, Kern, CA 93309	English Spanish	CARE Capitation (COC)	7	5	0	0		
Interfaith Food Bank & Thrift Store of Amador County	12181 Airport Rd., Jackson, CA 95642	English Spanish	CARE Capitation (COC)	1	0	0	0		

Organization Name	Address	Primary Languages Supported	Program	TOTAL CARE Applications Received	New CARE Enrollments	TOTAL FERA Applications Received	New FERA Enrollments	TOTAL ESA Applications Received	New ESA Enrollments
Merced County Community Action Agency	1235 W Main St., Merced, CA 95341	English Spanish Hmong	CARE Capitation (COC)	126	61	1	1		
Monument Crisis Center	1990 Market St., Concord, CA 94520	English Spanish Tagalog Vietnamese	CARE Capitation (COC)	3	3	0	0		
National Diversity Coalition (NDC)	15 Southgate Ave Ste 270, Daly City, CA 94015	English Spanish Tagalog	CARE Capitation (COC)	0	0	0	0		
North Coast Energy Services	PO Box 413, Ukiah, CA 95482	English Spanish	CARE Capitation (COC)	281	101	3	3		
Rebuilding Together East Bay Network	732 Gilman Street, Berkley, CA 94710	English Spanish	CARE Capitation (COC)	0	0	0	0		
Sacred Heart Community Service	1381 S First Street, San Jose, CA 95110	English Spanish	CARE Capitation (COC)	878	295	0	0		
Spectrum Community Services, Inc.	2621 Barrington Court, Hayward, CA 94545	English Spanish	CARE Capitation (COC)	13	3	0	0		
UpValley Family Centers of Napa	1440 Spring St., St Helena, CA 94574	English Spanish	CARE Capitation (COC)	2	1	0	0		
Valley Clean Air	921 11th St., Suite 220, Sacramento, CA 95814	English Spanish	CARE Capitation (COC)	5	3	0	0		
Welcome Tech	12121 Wilshire Blvd., Los Angeles, CA 90025	English Spanish	CARE Capitation (COC)	79	15	0	0		
West Modesto Community Collaborative	601 S Martin Luther King Dr., Modesto, CA 95351	English Spanish	CARE Capitation (COC)	0	0	0	0		
Amador-Tuolumne CAA	10590 CA-88, Jackson CA 95642	English Spanish	LIHEAP						
Butte County CAA	2640 5th Avenue #1, Oroville CA 95965	English	LIHEAP						
CAP Kern	5005 Business Park N., Bakersfield, CA 93309	English Spanish	LIHEAP						
CAP Madera	1225 Gill Avenue, Madera, CA 93637	English Spanish	LIHEAP						
CAP San Luis Obispo County	1030 Southwood Drive, San Luis Obispo, CA 93401	English Spanish	LIHEAP					377	
CAP Santa Barbara County	5638 Hollister Ave # 230, Goleta, CA 93117	English Spanish	LIHEAP						
Central Coast Energy Services	Aviation Way, Freedom, CA 95019	English Spanish	LIHEAP						
Central Valley Opportunity Center	6838 Bridget Court, Winton, CA 95388	English Spanish	LIHEAP						
Community Action Marin	555 Northgate Drive, San Rafael, CA 94903	English Spanish	LIHEAP						
Community Resource Project Inc	250 Harris Ave #6, Sacramento, CA 95838	English Spanish Vietnamese Chinese	LIHEAP						
Community Services & Employment Training	304 E Tulare Avenue, Tulare, CA 93274	English Spanish	LIHEAP						
Contra Costa Community Services Bureau	1470 Civic Court #200, Concord, CA 94520	English	LIHEAP						
El Dorado County Dept. of Human Services	3057 Briw Ridge Court # A, Placerville, CA 95667	English Spanish	LIHEAP						
Fresno EOC	1371 Stanislaus Street, Fresno, CA 93706	English	LIHEAP						
Glenn County Health & Human Services	420 E Laurel Street, Willows, CA 95988	English Spanish	LIHEAP						
Great Northern Services	310 Boles Street, Weed, CA 96094	English Spanish	LIHEAP						

Organization Name	Address	Primary Languages Supported	Program	TOTAL CARE Applications Received	New CARE Enrollments	TOTAL FERA Applications Received	New FERA Enrollments	TOTAL ESA Applications Received	New ESA Enrollments
Kings CAO, Inc.	10918 12th Avenue, Hanford, CA 93230	English Spanish	LIHEAP						
Lassen EDC	200 Highway A21, Westwood, CA 96137	English	LIHEAP						
Mariposa County Dept. of Human Services	5362 Lemee Lane, Mariposa, CA 95338	English	LIHEAP						
Merced County Community Action Agency	1235 W Main Street, Merced, cA 95340	English Spanish Hmong	LIHEAP						
North Coast Energy Services	1000 Texas St G, Fairfield, CA 94533	English	LIHEAP						
Plumas County CDC	183 W Main Street, Quincy, CA 95971	English	LIHEAP						
Project GO, Inc.	801 Vernon Street, Roseville, CA 95678	English Spanish	LIHEAP						
Redwood CAA	904 G Street, Eureka, CA 95501	English	LIHEAP						
Sacred Heart Community Services	1381 South First Street, San Jose, CA 95110	English Spanish	LIHEAP						
San Benito CDCS	1111 San Felipe Road, Hollister, CA 95023	English Spanish	LIHEAP						
San Joaquin County Dept. of ACS	333 Washington Street, Stockton, CA 95202	English Spanish	LIHEAP						
Self Help Home Improvement Project (SHHIP)	3777 Meadow View Drive #100, Redding, CA 96002	English	LIHEAP						
Spectrum Community Services, Inc.	2621 Barrington Court, Hayward, CA 94545	English Spanish	LIHEAP						
Spectrum Community Services, Inc.	2621 Barrington Court, Hayward, CA 94545	English Spanish	LIHEAP						
Cloverdale Senior Multipurpose Center	311 N. Main Street Cloverdale, CA 95425	English Spanish	Senior Advocate Outreach Grant						
Hmong Inc.	4023 W CLINTON AVE 67 Fresno, CA	English Hmong	Senior Advocate Outreach Grant						
NDC	501 Hillside Blvd South San Francisco, CA 94080 Daly City, CA 94015	English Spanish Tagalog	Senior Advocate Outreach Grant						
SF Consumer Action	57 POST ST STE 611 S.F. CA 94105	English Spanish	Senior Advocate Outreach Grant						
Time in Destiny Christian Center	1028 P Street Sanger, CA 93657	English Spanish	Senior Advocate Outreach Grant						
United Way of Merced County	United Way of Merced County 531 West Main St Merced, CA 95340	English Spanish	Senior Advocate Outreach Grant						
Community Bridges - Meals on Wheels Santa Cruz County	519 MAIN ST, WATSONVILLE, CA	English Spanish	Senior Advocate Outreach Grant						
North Coast Energy Services	966 MAZZONI ST STE 3B UKIAH, CA 95482	English Spanish	Senior Advocate Outreach Grant						
Central Coast Energy Services	135 Aviation Way, Ste 7 Watsonville, CA 95076	English Spanish	Senior Advocate Outreach Grant						
El Concilio of California	445 North San Joaquin St. Stockton, CA 95202	English Spanish	Senior Advocate Outreach Grant						
Meals on Wheals Diablo	1300 Civic Drive Walnut Creek, CA 94596	English Spanish	Senior Advocate Outreach Grant						
CAP Kern	5005 Business Park N., Bakersfield, CA 93309	English Spanish	CBO Case Management Pilot						

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 6

BILLING, REVENUE, AND CREDIT

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 6
BILLING, REVENUE, AND CREDIT

TABLE OF CONTENTS

A. Introduction and Summary 6-1
1. Overview 6-1
2. Summary of Request 6-1
a. Expense 6-4
b. Capital 6-4
B. Billing, Revenue, and Credit Expense Forecast 6-6
1. Billing Operations 6-6
a. Overview 6-6
b. Forecast 6-8
2. Credit Policy and Operations 6-11
a. Overview 6-11
b. Forecast 6-11
3. Revenue Operations 6-14
a. Overview 6-14
b. Forecast 6-14
C. Billing, Revenue, and Credit Capital Forecast 6-15
1. Bill Printers (MWC 21) 6-15
a. Overview 6-15
b. Forecast 6-15
2. Electronic Payment Enhancements Project (MWC 21) 6-17
a. Overview 6-17
b. Forecast 6-17
3. Credit Segmentation Project (MWC 21) 6-19
a. Overview 6-19

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 6
BILLING, REVENUE, AND CREDIT

TABLE OF CONTENTS
(CONTINUED)

b. Costs and Forecasts 6-19

4. BOE Read Validation Gas Modules (MWC 74) 6-21

a. Overview 6-21

D. Compliance With Prior Commission Decisions 6-23

1. Uncollectibles 6-23

2. Senate Bill 598 6-23

3. Billing Compliance Report 6-26

E. Conclusion 6-26

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 6
BILLING, REVENUE, AND CREDIT

A. Introduction and Summary

1. Overview

The purpose of this chapter is to demonstrate that Pacific Gas and Electric Company's (PG&E) forecasts of expense and capital expenditures for Billing, Revenue, and Credit are reasonable and should be approved. Billing, Revenue, and Credit includes the following three primary activities:

- Billing Operations: Investigates and resolves billing exceptions to improve the customer experience and ensures accurate billing for customers receiving service under complex rate schedules or programs that are not supported by PG&E's customer information system (CIS). Additionally, Billing Operations ensures timely and effective communication with customers about their accounts. Customers can choose their preferred format, including paperless, printed, and accessible print options such as large font and braille.
- Credit Policy and Operations: Manages PG&E's credit and collections process, which helps customers enroll in bill assistance programs to pay past due bills and supports affordability by aiming to reduce the amount of uncollectibles, which are ultimately collected from all customers through higher rates. It also manages payment processing to ensure payments are posted to customer accounts timely and resolves payment-related customer inquiries.
- Revenue Operations: Supports accurate and timely billing and payment processing by managing monthly closing revenue processes, customer refunds, and daily cash receipts. It also supports compliance and reporting by remitting taxes and fees.

2. Summary of Request

PG&E requests that the Commission:

- Adopt the expense forecasts in Section A.2, Table 6-1;
- Adopt the capital expenditure forecasts in Section A.2, Table 6-2;

- Adopt PG&E's proposal to continue using a 10-year rolling average to calculate its uncollectibles factor, discussed in Section D.1.

TABLE 6-1
BILLING, REVENUE, AND CREDIT
EXPENSE BY MWC
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted 2020	2021	2022	2023	2024	Forecast 2025	2026	2027
1	AR	Read & Investigate Meters	$(362)	$(1,177)	$(185)	$(1,061)	$(2,627)	$(2,337)	$(2,290)	$(2,272)
2	EZ	Manage Var Cust Care Processes	1,770	1,553	1,524	1,058	1,257	1,179	1,156	1,609
3	IS	Bill Customers	47,357	52,288	58,595	61,572	46,474	48,952	51,957	54,675
4	IT	Manage Credit	8,255	8,169	13,228	22,519	25,583	19,189	20,204	28,518
5	IU	Collect Revenue	6,890	7,461	6,867	6,413	6,027	6,752	6,617	8,065
6		Total	$63,910	$68,295	$80,030	$90,500	$76,714	$73,736	$77,644	$90,595

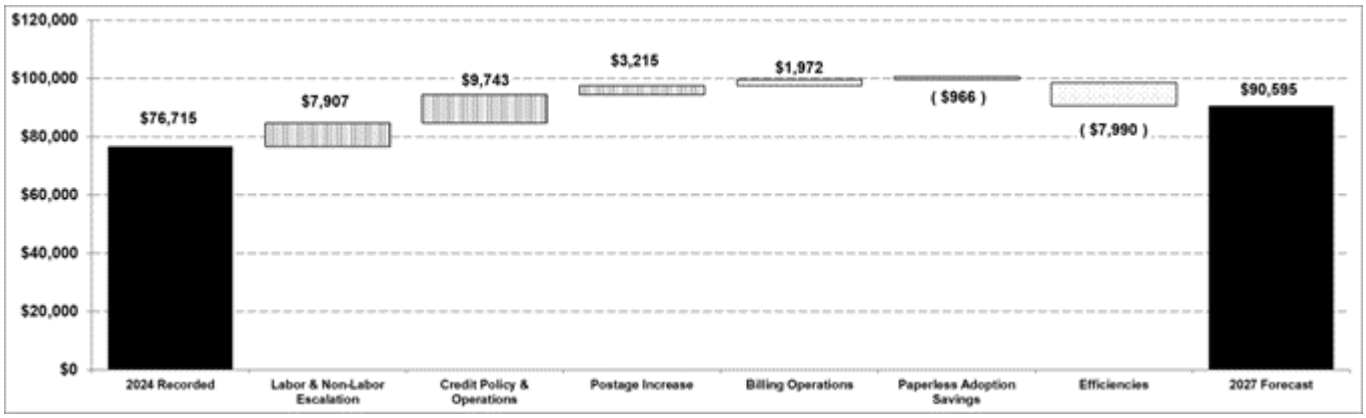
TABLE 6-2
BILLING, REVENUE, AND CREDIT
CAPITAL BY MWC
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted 2020	2021	2022	2023	2024	Forecast 2025	2026	2027	2028	2029	2030
1	21	Misc. Capital	$1,146	$4,771	$863	$847	$14	$2,000	$10,000	$5,528	$1,557	$1,587	$1,617
2	74	Install New Gas Meters	–	–	892	940	1,372	1,190	1,190	1,287	1,326	1,365	1,406
3	77	IT – CIS	–	–	–	–	177	–	–	–	–	–	–
4		Total	$1,146	$4,771	$1,754	$1,787	$1,563	$3,190	$11,190	$6,815	$2,883	$2,952	$3,023

a. Expense

Figure 6-1 provides an expense walk identifying key drivers for the $13.8 million increase in the 2027 forecast ($90.6 million) compared to 2024 recorded costs of $76.7 million. Each driver is summarized below:

FIGURE 6-1
BILLING, REVENUE, AND CREDIT
EXPENSE WALK (2024-2027)
(THOUSAND OF NOMINAL DOLLARS)



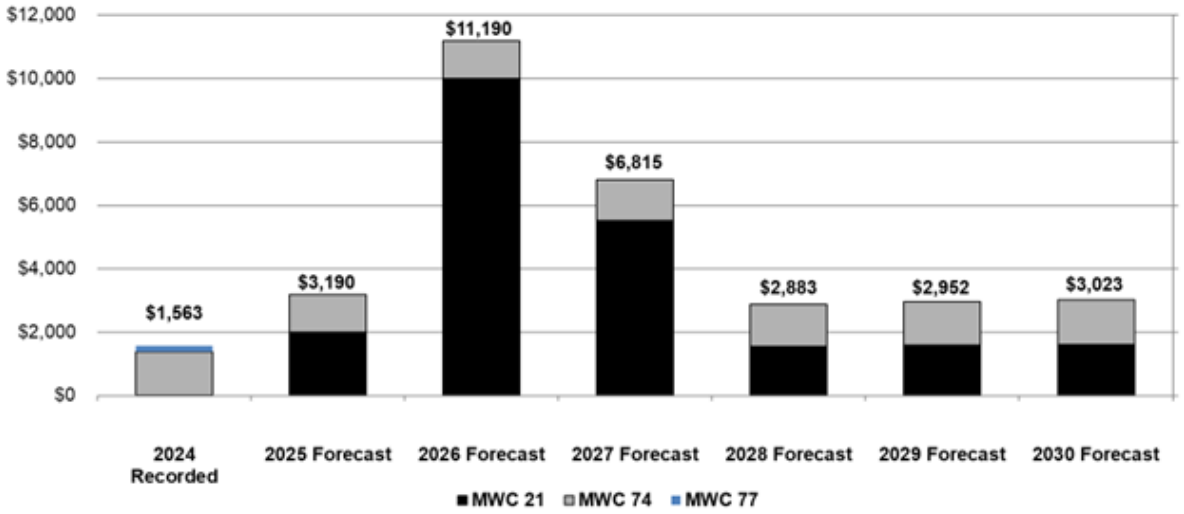
1) A $7.9 million increase associated with labor and non-labor escalation for Billing, Revenue, and Credit activities.
2) A $9.7 increase for expanding credit and collection activities, including additional field resources to address non-remote capable collections, such as field notice posting and outreach, expanding non-energy collections, and additional contract costs associated with electronic payment channels through the utilization of digital wallet functionality. The increase is offset by efficiencies within Credit Operations.
3) Escalation of postage associated with mailing customer statements and collection notices, which is $3.3 million higher than 2024 recorded adjusted costs due to bi-annual increases imposed by the United State Postal Service that began in 2022.

b. Capital

Figure 6-2 provides a capital walk identifying key drivers for the $5.3 million increase in the 2027 forecast ($6.8 million) compared to 2024 recorded costs of $1.6 million. These drivers are partially offset by

a decrease of $0.2 million which is due to a one-time expense in 2024 to extend data retention for billing databases.

FIGURE 6-2
BILLING, REVENUE, AND CREDIT
CAPITAL WALK (2024-2030)
(THOUSAND OF NOMINAL DOLLARS)



1) A $2.5 million increase for Credit Policy and Operations to develop and implement a new credit segmentation methodology that will leverage data analytics from customer payment behaviors and industry data to enable PG&E to support customer outreach efforts.
2) An increase of $1.5 million for electronic payment channel enhancements, including digital wallet payment services, text-to-pay features, and a mobile application. These improvements will support customers by expanding access to payment options and supporting timely payment notification to assist with managing account balances.
3) An increase of $10.0 million to replace five printers in Printing and Bill Presentment. These are the main continuous feed printers that print the majority of customer bills and notices, as well as customer notifications. The hardware within the printers is reaching end-of-life without the ability to obtain extended service. Replacing these

printers will continue to provide customers with their monthly statements and credit notices.

B. Billing, Revenue, and Credit Expense Forecast

Table 6-3 provides an overview of Billing, Revenue, and Credit activities as well as their supporting functions and associated MWCs. PG&E discusses these activities and their forecasts in further detail below.

TABLE 6-3-
ACTIVITY MAPPING TO MWC
FOR BILLING, REVENUE, AND CREDIT

Line No.	Activities	Functions	MWC
1	Billing Operations	Billing Operations Exceptions	MWC IS, AR
		Business Delivery	MWC IS
		Complex Billing	MWC IS, AR, EZ
		Billing Systems and Analytics	MWC IS
		Printing and Bill Presentment	MWC IS, IT, EZ, 21, 74
3	Revenue Operations	Revenue & Statistics	MWC IS, IU
4	Credit Policy and Operations	Credit Operations	MWC IT, IS
		Customer Revenue Processing	MWC IU, EZ
		Field Collections	MWC IT

1. Billing Operations

a. Overview

PG&E's Billing Operations are responsible for providing customer billing and includes Billing Operations Exceptions, Complex Billing, Business Delivery, and Billing Systems and Analytics and Printing and Bill Presentment work. Each of these activities and their associated benefits are described in further detail below.

- Billing Operations Exceptions: Investigates and resolves billing exceptions to improve the customer experience. Activities include billing exceptions processing, account maintenance, and customer initiated-request processing as described below.
  - Billing exceptions processing:

- Validating, processing, and correcting reads from PG&E's Advanced Metering Infrastructure (AMI) network;
- Reviewing and correcting bills that fail billing system parameters resulting in manual intervention; and
- Reviewing and correcting requests generated by third parties for Direct Access (DA), Core Transport Agent (CTA), and Community Choice Aggregation customers.

– Account maintenance:

- Completing orders for customers who have moved;
- Initiating and maintaining service for residential Net Energy Metering (NEM) customers; and
- Processing adjustments for meters that fail variance testing after removal at the meter plant.

– Customer initiated-requests:

- Processing rate changes; establishing or terminating landlord agreements, processing customer requests to opt out of electric or gas AMI, and California Alternate Rates for Energy (CARE) adjustments.

- Complex Billing: Supports some of PG&E's largest industrial and complex solar customers. The activities performed by this functional area benefit customers by ensuring that customers receiving service under complex rate schedules and/or programs that are not supported by PG&E's customer information system are billed accurately. Examples of Complex Billing activities include:
  – Calculating electric bills for the largest bundled commercial electric customers, DA customers receiving service under consolidated bill service, and bundled electric customers on specialized tariffs (e.g., standby, electric vehicle, departed load, and demand response programs);
  – Account setup and billing for approximately 130,000 NEM customers and the various Complex Billing programs associated with these customers; and

  - Account setup and billing for non-core, CTA, backbone transmission gas customers, and natural gas vehicle program customers.
- Business Delivery: Supports process documentation, communication, training, and quality assurance (QA) reviews; developing metrics to track Billing Operations performance; compliance monitoring and reporting; and budget and resource forecasting for Billing Operations.
- Billing System and Analytics (BSA): Data-focused team whose work is concentrated around the strategic use of technology to manage billing system enhancements and development, billing system integration, Salesforce, process improvement, automation, SmartMeter™ exceptions, and system support. This functional area supports technology enhancements and serves as the business liaison for Information Technology (IT) work.
- Printing and Bill Presentment (PBP): Responsible for printing bills, notices and customer miscellaneous mail pieces (customer correspondence, customer refunds, employee related payroll), inserting them into envelopes, and mailing them to customers/employees. In 2024, PG&E produced approximately 33.8 million paper bills, 900 Braille bills, and 13,000 large font bills. In addition to the mailing processing, PBP manages electronic bill presentment for paperless billing customers. PG&E provided customers with 41.9 million electronic bills in 2024, an 11.2 percent increase from 2021.

b. Forecast

Table 6-4 identifies the historical (2020-2024) and forecast (2025-2027) costs for Billing Operations. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $8.5 million increase from 2024 recorded costs, and the customer benefits associated with the forecasted work.

TABLE 6-4
BILLING, REVENUE, AND CREDIT
HISTORICAL AND FORECAST COSTS – BILLING OPERATIONS
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	AR	$(362)	$(1,177)	$(185)	$(1,061)	$(2,627)	$(2,337)	$(2,290)	$(2,272)
2	EZ	1090	922	993	719	924	863	846	1,249
3	IS	46,020	50.998	57,355	60,686	45,262	47,482	50,573	53,079
4	IT	385	70	623	1,101	1,948	1,792	1,756	1,907
5	Total	$47,133	$50,803	$58,786	$61,445	$45,508	$47,801	$50,885	$53,963

PG&E's 2027 forecast for Billing Operations is $8.5 million higher than 2024 recorded costs due to labor escalation ($5.2 million), additional staffing required to support Billing Operations activities ($1.7 million),[1] and a 20 percent increase in postage costs forecasted by the United States Postal Service[2] between 2024 and 2027 ($3.2 million),[3] which are partially offset by efficiencies identified through waste elimination efforts. PG&E developed its 2027 forecast using 2024 recorded costs as a starting point because it provides the most recent and accurate representation of the rates and programs that Billing Operations supports. PG&E then assessed the new/modified rates and programs that will require additional Billing Operations support in 2027 and applied adjustments to 2024 recorded costs associated with these incremental staffing needs as well as anticipated efficiencies associated with ongoing waste elimination efforts.

PG&E requests additional FTEs associated with the following Billing Operations activities:

- Operationalizing the electric vehicle submetering process, which will require three service representatives for exception processing and account maintenance. Current work is being charged to a balancing account and work will be operationalized. This assumes automation

---

1 Exhibit (PG&E-6), WP 6-16, line 6.

2 United States Postal Service Updated Schedule for Regular and Predictable Rate Adjustments, available at: https://prc.arkcase.com/api/prc-dockets/filing/downloadFile?fileId=207868&inline=true (accessed April 30, 2025).

3 Exhibit (PG&E-6), WP 6-19, line 4.

and additional functionality is available for exception processing. ($0.5 million increase compared to 2024 recorded costs).[4]

- Managing the E-Store program and assisting Net Energy Metering customers requesting non-export capabilities in order to remain on their current NEM rate instead of enrolling in new Net Billing Tariff (NBT). Exception processing and account maintenance associated with these activities will require four service representatives, two business analysts and an expert business analyst respectively. ($0.8 million increase compared to 2024 recorded costs).[5]
- Supporting field personnel and customers through personalized outreach in attempt to reschedule field maintenance, which will require six service representatives. These representatives will be utilized for customer outreach in instances where field personnel are not able to access a customer's meter due to dogs or locked gates, in instances where meter maintenance was attempted at their property. While PG&E has utilized text ahead, IVR, and emails to communicate with customers regarding field visitations, there is an approximate 20 percent "Can't Get In" (CGI) rate. These efforts have seen a response rate of 5-10 percent and in previous pilots on live outreach to customers, the response rate is closer to 20 percent with higher completion of meter maintenance requests after field orders are scheduled. Personalized outreach will result in reduced truck rolls to customer location and alleviate customer frustration with estimated bills due to incomplete/delayed meter maintenance. This represents an increase of $0.5 million over 2024 recorded costs.[6]

PG&E's 2027 forecast for postage increases is necessary to allow customers to receive their monthly bills and credit notices on time and in their preferred formats. It also benefits customers by providing ongoing

---

4 Exhibit (PG&E-6), WP 6-16, line 4.

5 Exhibit (PG&E-6), WP 6-16, lines 1 and 3.

6 Exhibit (PG&E-6), WP 6-16, line 2 and WP 6-17, line 7.

support for paperless billing, which helps reduce spending on printing, inserting, and mailing paper materials.

2. Credit Policy and Operations

a. Overview

Credit Policy and Operations includes three functions: Credit Operations, Customer Revenue Processing, and Field Collections.

Credit Operations collects past-due balances from customers to manage financial risk to PG&E and minimize the amount of uncollectibles recovered from PG&E's other customers in rates. Credit manages delinquent accounts receivable for active residential and non-residential accounts and implements recovery strategies on closed accounts. Credit Operations also supports customers with enrollment into various programs such as payment plans, Arrearage Management Plan (AMP), and other low-income programs.

Customer Revenue Processing processes payments received via the United States Postal Service (USPS). In 2024, Customer Revenue Processing processed 9.2 million payments for a combined $9.1 billion, of which 87.3 percent was processed and posted to customer accounts on the same day received. In addition, Customer Revenue Processing researches and resolves payment related customer inquiries. In 2024, Customer Revenue Processing resolved approximately 130,000 payment inquiries.

Field Collections performs in-field service disconnections due to non-payment of bills after all attempts to collect have been exhausted and where remote disconnect capability is not available.

b. Forecast

Table 6-5 identifies the historical (2020-2024) and forecast (2025-2027) costs for Credit Policy and Operations. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $5.2 million increase from 2024 recorded costs, and the customer benefits associated with the forecasted work.

TABLE 6-5
BILLING, REVENUE, AND CREDIT
HISTORICAL AND FORECAST COSTS – CREDIT POLICY AND OPERATIONS
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	$680	$632	$532	$339	$333	$316	$310	$360
2	IS	171	138	33	87	49	176	173	201
3	IT	7,871	8,099	12,605	21,418	23,634	17,397	18,448	26,611
4	IU	5,823	6,454	6,271	5,845	5,274	6,055	5,934	7,274
5	Total	$14,545	$15,322	$19,442	$27,689	$29,291	$23,944	$24,864	$34,446

PG&E's 2027 forecast for Credit Policy and Operations is $5.2 million higher than 2024 recorded costs due to labor escalation ($2.5 million) and increased support for Credit Policy and Operations activities ($9.7 million),[7] which are partially offset by attrition of temporary staff in 2025 to aid the reimplementation of credit activities following the resumption of residential disconnections in 2022 ($7.2 million).[8]

PG&E developed its 2027 forecast for Credit Policy and Operations using 2024 recorded costs as a starting point before accounting for escalation and incremental business needs. 2024 recorded costs provide the most accurate and relevant foundation for the Credit Policy and Operations forecast because recorded costs from 2020-2022 were significantly lower than anticipated due to the impact of the moratorium on disconnections implemented in response to the COVID-19 pandemic. As a result of the pandemic, PG&E did not disconnect residential customers from March 2020-September 2022. This pause in disconnections led to a significant increase in account receivables, rising from $233 million to a peak of $1.3 billion.

Following the resumption of disconnections, recorded costs for Credit Policy and Operations increased by $1.6 million from 2023 to 2024 due to increased collection agency, field collection, and temporary staffing costs that were needed to support the reduction in accounts

7 Exhibit (PG&E-6), WP 6-15, line 11.

8 Exhibit (PG&E-6), WP 6-14, line 1.

receivables accumulated during the pandemic. Although the resumption of disconnections activity contributed to a reduction in receivables, the number remains historically high, currently totaling $800 million. Ongoing implementation of Commission-mandated customer disconnection protections (for example, adopting new technology for benefit of service investigations), in addition to ongoing efforts to provide customer support with past due balances, have necessitated additional resources and process changes.

The $2.7 million increase in the Credit Policy and Operations forecast includes additional costs for collection notices, payments to collections agencies on past due accounts, expansion of field and back-office staff to assist with additional collection efforts including direct customer outreach from CSRs to provide payment assistance information, enroll customers in programs, ensure customers are on optimal rates that assist with timely payments and avoids disconnection. New collection communications are being sent by Credit Policy and Operations via email and text messages providing additional avenues for customers to make payments and manage utility bills. The additional field resources will support in-field disconnection requirements and Credit Policy and Operations and will also look to expand the field posting process to allow customers one final attempt prior to disconnection.

Reimplementation and enhancements to these processes however, will increase exception work and require additional staff to assist with customer outreach. With complex requirements including added criteria for gas disconnections, reimplementation will pose significant technical challenges. These activities and additional resources will support PG&E's goal to reduce accounts receivables, benefiting customers since uncollectible bills are recovered through higher rates. Directing customers to bill assistance programs helps them enroll in applicable programs that assist with timely payment and managing utility bills.

Additional back-office staff will support work tied to Rule 3 benefit of service investigations and customer account fraud prevention, as well as our non-energy collection efforts. Back-office staff will support

non-energy receivables and address exceptions related to contract work, main line extension, relocation of meter requests, and support the rapid expansion of new construction project-related work.

3. Revenue Operations

a. Overview

Revenue Operations supports revenue reporting, cash management, and remittance of taxes and fees;[9] the monthly closing revenue process, reconciling PG&E's primary customer depository bank accounts, managing customer refunds; reconciling daily cash receipts; and quality assurance testing prior to implementation of new rates, and bill credits within the customer information system.

b. Forecast

Table 6-6 identifies the historical (2020-2024) and forecast (2025-2027) costs for Revenue Operations. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $0.3 million increase from 2024 recorded costs, and the customer benefits associated with the forecasted work.

TABLE 6-6
BILLING, REVENUE, AND CREDIT
HISTORICAL AND FORECAST COSTS – REVENUE OPERATIONS
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	IS	$1,166	$1,161	$1,207	$798	$1,163	$1,293	$1,210	$1,395
2	IU	1,067	1,008	596	567	753	697	683	791
3	Total	$2,233	$2,168	$1,803	$1,365	$1,916	$1,991	$1,894	$2,186

PG&E's 2027 forecast for Revenue Operations is $0.3 million higher than 2024 recorded costs due to labor escalation. PG&E does not forecast new or modified activities for Revenue Operations, which will continue to support customers by performing key Sarbanes Oxley (SOX)

[9] For example, this includes the Utility User's Tax, annual franchise fees, franchise fee surcharges, and city franchise surcharges.

controls for customer bill and payment accuracy, reporting remittances of customer pass-through charges, and managing customer refunds and bill credits, as well as escheatment processes.

C. Billing, Revenue, and Credit Capital Forecast

1. Bill Printers (MWC 21)

a. Overview

In 2017, PG&E's Bill Print facility replaced its high-speed energy statement printers. New high speed inkjet printers were purchased to replace the former toner-based printers that were in use since 2007. This effort resulted in additional print capabilities that enabled PG&E to transition to white paper from pre-printed stock, providing printing and insertion efficiencies.

b. Forecast

Table 6-7 identifies the historical (2020-2024) and forecast (2025-2027) costs for the Bill Printers Project. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $10.5 million increase from 2024 recorded costs, and the customer benefits associated with the forecasted work.

TABLE 6-7
BILLING, REVENUE, AND CREDIT
HISTORICAL AND FORECAST COSTS – BILL PRINTERS
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast					
		2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
1	21	–	–	–	–	–	–	$8,500	$1,500	–	–	–
2	Total	–	–	–	–	–	–	$8,500	$1,500	–	–	–

PG&E's 2027 forecast for Bill Printers is $1.5 million higher than 2024 recorded costs because this is a new project with forecasted costs only in 2026 ($8.5 million) and 2027 ($1.5 million). PG&E developed its 2027 forecast based on previous replacements and escalated pricing from the previous replacement. PG&E's printers will need to be replaced because support for current ink jet printers will end in March 2027 due to hardware obsolescence in the printers. Extended support for the current printers is not available. Accordingly, PG&E seeks to replace its existing high speed ink jet printers with updated technology to continue to provide customers with timely delivery of customer statements, delinquency notices, customer notifications, and checks.

2. Electronic Payment Enhancements Project (MWC 21)

a. Overview

PG&E continues to explore opportunities to provide customers with expanded payment options. PG&E will be expanding and updating its electronic payment channels through the incorporation of digital wallet functionality and updating capabilities with our current vendor to provide customers with ease of text-to-pay features, and a mobile application. These improvements will support customers by expanding access to payment options and supporting timely payment notification to assist with managing account balances.

b. Forecast

Table 6-8 identifies the historical (2020-2024) and forecast (2025-2027) costs for the Electronic Payment Enhancements Project.

TABLE 6-8
BILLING, REVENUE, AND CREDIT
HISTORICAL AND FORECAST COSTS – ELECTRONIC PAYMENT ENHANCEMENTS PROJECT
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast					
		2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
1	21	–	–	–	–	–	$1,500	$1,500	$1,528	$1,557	$1,587	$1,617
2	Total	–	–	–	–	–	$1,500	$1,500	$1,528	$1,557	$1,587	$1,617

3. Credit Segmentation Project (MWC 21)

a. Overview

Credit Policy and Operations team relies on manual and cumbersome processes to perform collection activities. Currently, reports are manually pulled to identify past due accounts and perform collection activities. These reports are used to identify which customers need various outreach efforts such as live calls, emails, or text messages. Currently, PG&E does not have a collections management tool or predictive modeling to understand customer behaviors or a customer's ability to pay.

Credit Policy and Operations proposes the Credit Segmentation Project as predictive analytics, utilizing customer segmentation and artificial intelligence, to better understand who to make outreach efforts to, when to make those outreach attempts, and what the customer response is to the various outreach efforts. Customer feedback and surveys have shown that targeted communications have proven effective. By having additional insights, Credit Policy and Operations will be able to make datadriven collection-related decisions. PG&E anticipates that improving its ability to know when to perform outreach and what bill assistance programs are best for certain customers will help improve customer satisfaction and reduce accounts receivables.

PG&E's one-time capital forecast of $2.5 million in 2027 includes developing the segmentation modeling, building out necessary data connections between PG&E and a third-party vendor that will lead the project, developing a segmentation platform, and testing the modeling and platform prior to implementation.

b. Costs and Forecasts

Table 6-9 identifies the historical (2020-2024) and forecast (2025-2027) costs for the Credit Segmentation Project.

TABLE 6-9
BILLING, REVENUE, AND CREDIT
HISTORICAL AND FORECAST COSTS – CREDIT SEGMENTATION PROJECT
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast					
		2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
1	21	–	–	–	–	–	–	–	$2,500	–	–	–
2	Total	–	–	–	–	–	–	–	$2,500	–	–	–

4. BOE Read Validation Gas Modules (MWC 74)

a. Overview

Billing Operations Exceptions monitors gas module/meter exchanges related to meter maintenance and when exceptions are generated based on those exchanges, the time associated with the exception is charged to MWC 74. PG&E's 2027-2030 forecast for these activities is relatively flat compared to 2024 recorded costs.

Table 6-10 identifies the historical (2020-2024) and forecast (2025-2027) costs for BOE Read Validation Gas Modules.

TABLE 6-10
BILLING, REVENUE, AND CREDIT
HISTORICAL AND FORECAST COSTS – BOE READ VALIDATION GAS MODULES PROJECT
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast					
		2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
1	74	–	–	$892	$940	$1,372	$1,190	$1,190	$1,287	$1,326	$1,365	$1,406
2	Total	–	–	$892	$940	$1,372	$1,190	$1,190	$1,287	$1,326	$1,365	$1,406

D. Compliance With Prior Commission Decisions

1. Uncollectibles

In PG&E's 2014 GRC, the Commission adopted a methodology for PG&E to calculate an annual uncollectibles factor based on a 10-year rolling average of the yearly uncollectibles factor.[10] Since the adoption of this approach, PG&E has submitted an annual Tier 1 advice letter to update the uncollectibles factor consistent with this methodology.

The Commission's decision in PG&E's 2017 GRC affirmed the continued use of a 10-year rolling average to calculate the annual uncollectibles factor as described in the 2017 GRC Settlement Agreement.[11] PG&E did not seek changes to the methodology for calculating uncollectibles in its 2020 and 2023 GRCs. PG&E confirms that it is not seeking a change in methodology for the uncollectibles factor in the 2027 GRC cycle and will continue to submit an annual Tier 1 advice letter to update the uncollectibles factor, effective January 1 of each year.

2. Senate Bill 598

Senate Bill (SB) 598, which added Section 718 to the California Public Utilities Code (Pub. Util. Code), states:

> (1) In each gas and electrical corporation general rate case, the commission shall do both of the following:
>
> > (A) Designate the impact of any proposed increase in rates on disconnections for nonpayment as an issue in the scope of the proceeding.
> >
> > (B) Conduct an assessment of and properly identify the impact of any proposed increase in rates on disconnections for nonpayment, which shall be included in the record of the proceeding.
>
> (2) The Commission shall adopt residential utility disconnections for nonpayment as a metric and incorporate the metric into each gas and electrical corporate general rate case.[12]

In its decision on PG&E's 2020 General Rate Case (GRC), the Commission directed PG&E to provide:

---

[10] D.14-08-032, pp. 291-292.

[11] D.17-05-013, p. 94.

[12] Cal. Pub. Util. Code, § 718(b)(2).

> testimony on the actual annual percentages of residential utility disconnections for nonpayment during this GRC cycle [2020-2022] and an analysis of the impact rate increases have on disconnections during this GRC period.[13]
>
> Pursuant to Decision 20-06-003, which set an annual cap of four percent on the percentage of residential customer accounts that Pacific Gas and Electric Company can disconnect from utility service in 2020, 2021, and 2022, this decision shall apply the four percent cap as the metric for residential nonpayment disconnections as directed in Public Utilities Code 718(b).[14]

In its 2023 GRC, PG&E noted that it could not conduct an analysis to determine if there was a correlation between disconnections and rate increases during the 2020 GRC cycle due to the moratorium on disconnections implemented due to the COVID-19 pandemic and the lack of any rate changes in the three months prior to the moratorium in March 2020.[15] In 2021 and 2022, PG&E applied a total of $560 million in federal COVID-19 relief funding to eligible past due balances through the California Arrearage Payment Program (CAPP). Because CAPP funding required PG&E to implement an additional moratorium on disconnections, PG&E did not resume disconnecting residential customers until August 2022.

Since filing its 2023 GRC, PG&E has continued to comply with the annual disconnection caps adopted by the Commission in D.20-06-003. Table 6-11 summarizes the disconnection caps and PG&E's actual disconnection rate since 2020.

TABLE 6-11
ANNUAL DISCONNECTION RATE COMPARED TO ANNUAL CAP

Line No.	Year	Disconnection Rate	Disconnection Cap
1	2020	–	4%
2	2021	–	4%
3	2022	0.33%	4%
4	2023	3.25%	3.5%
5	2024	3.40%	3.5%

[13] D.20-12-005, p. 414, OP 16.

[14] D.20-12-005, p. 414, OP 17.

[15] A.21-06-021, Exhibit (PG&E-6), Ch. 6 "Billing, Revenue, and Credit," p. 6-13.

In addition to the disconnection moratoriums and caps, other protections and policies placed limitations on utility disconnections. D.18-12-013 prohibited disconnections when temperatures were forecasted to be above 100 degrees or below 32 degrees based on a 72-hour look-ahead window.[16] Furthermore, customers who qualified for medical baseline or were 65 years of age were prohibited from being disconnected so long as they agreed to a payment plan.[17] D.20-06-003 removed the protection for customers 65 and older, however, adopted the interim rules regarding temperature related disconnection policies to reduce residential customer disconnections.[18] D.20-06-003 also placed limitations on disconnections if customers had a pending LIHEAP pledge or were actively participating in a 12-month payment plan and was current on both monthly bills and the plan.[19] Subsequent to the issuance of D.20-06-003, additional long-term payment plans such as the COVID-19 relief payment plans[20] and 24-month payment plans were implemented, with similar disconnections prohibitions.[21]

Pursuant to Pub. Util. Code Section 718, PG&E analyzed the impact of rate increases on disconnections during the 2023 GRC period (i.e., 2023-2024). PG&E assessed the relationship between the average residential monthly bill and monthly residential disconnections using a three-month lag between the bill and disconnections based on feedback from The Utility Reform Network in the 2020 GRC.[22] PG&E's workpapers[23]

---

16 D.18-12-013, OP 1(c), p. 31.

17 D.18-12-013, OP 1(b), p. 30.

18 D.20-06-003, OP 1(f), p. 146.

19 D.20-06-003, OP 1(d)(e), p. 145-146.

20 Pursuant to D.21-06-036, eligible residential customers shall be automatically enrolled in COVID-19 relief payment plans that amortized arrearage over 24 months of payments. Any customer enrolled in these plans was not eligible for disconnection.

21 Pursuant to D.23-08-049, the Large Utilities will offer eligible residential customers 24-month payment plans until October 1, 2026. Utilities shall not disconnect any residential customer who is current on both monthly bills and the 24-month payment plan.

22 A.18-12-009, Tr. Vol. 17, 1874:24 to 1876:16, PG&E/Browne.

23 See Exhibit (PG&E-6), WPs 6-22 to WP 6-24.

include the underlying data used for the analysis and the correlation coefficients associated with the analysis, which PG&E conducted for all residential customers, customers enrolled in California Alternate Rates for Energy (CARE), and customers not enrolled in CARE. Correlation coefficients were nearly zero for all residential customers, 0.16 for CARE customers, and 0.02 for non-CARE customers.

3. Billing Compliance Report

The Commission has directed PG&E to report the number and amount of delayed bills and estimated bills, over time, that are uncollectible pursuant to Tariff Rule 17.1 time limits;[24] and performance with respect to minimizing uncollectible amounts due to Rule 17.1 time limits.[25]

TABLE 6-12
NUMBER OF AND RECORDED REVENUES RELATED TO LATE AND NON-COMPLIANT ESTIMATED BILLS
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	Description	2021	2022	2023	2024
1	Late Bills	$19,357	$15,810	$38,612	$24,119
2	Late Bill Uncollectible Revenue	$8,869	$18,447	$25,895	$24,258
3	Estimated Bills	–	–	–	–
4	Estimated Bill Uncollectible Revenue	–	–	–	–

E. Conclusion

Based on the evidence discussed above and the associated attachments and workpapers, PG&E requests that the Commission grant the requests presented in this chapter for Billing, Revenue, and Credit activities.

[24] D.07-09-041, p. 50.

[25] D.07-09-041, p. 64, OP 11.

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 7

METERING SERVICES AND ENGINEERING

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 7
METERING SERVICES AND ENGINEERING

TABLE OF CONTENTS

A. Introduction and Summary 7-1
1. Overview 7-1
2. Summary of Request 7-1
a. Expense 7-4
b. Capital 7-4
B. Metering Services and Engineering Expense Forecast 7-6
1. Automated Inventory Track and Trace (AIT&T) (MWC AB) 7-6
a. Overview 7-6
b. Costs and Forecast 7-6
2. Electric Meter Maintenance (MWC EY) 7-6
a. Overview 7-6
b. Forecast 7-7
3. SmartMeter Opt-Out Program and Supplemental Utility Meter Engineering Support (MWC EZ) 7-7
a. Overview 7-7
b. Costs and Forecast 7-8
4. Gas Meter Maintenance (MWC HY) 7-8
a. Overview 7-8
b. Costs and Forecast 7-9
C. Metering Services and Engineering Capital Forecast 7-9
1. Tools and Equipment (MWC 05) 7-9
a. Overview 7-9
b. Costs and Forecast 7-9
2. Miscellaneous Capital (MWC 21) 7-10

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 7
METERING SERVICES AND ENGINEERING

TABLE OF CONTENTS
(CONTINUED)

a. Overview 7-10

b. Costs and Forecast 7-11

3. Backup Power Transfer Meter (MWC 3M) 7-12

a. Overview 7-12

b. Forecast 7-14

4. Install New Electric Meters (MWC 25) 7-15

a. Overview 7-15

b. Costs and Forecast 7-16

5. Gas Meter Exchanges and Inventory Purchases (MWC 74) 7-16

a. Overview 7-16

b. Costs and Forecast 7-17

1) Gas Ultrasonic Meters 7-17

2) Large Gas Meter Communication 7-18

3) Bulk Gas Module/Meter Combo Inventory 7-19

D. Compliance with Prior Commission Decisions 7-20

1. SmartMeter Opt-Out 7-20

2. SmartMeter Cost Effectiveness Update 7-21

3. Future SmartMeter Updates 7-21

E. Conclusion 7-21

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 7
METERING SERVICES AND ENGINEERING

A. Introduction and Summary

1. Overview

This chapter requests approval for Pacific Gas and Electric Company's (PG&E or the Company) expense and capital forecasts for Metering Services and Engineering (MS&E). MS&E's programs are essential and fundamental because they enable PG&E to accurately and timely bill customers for their gas and electric service. Adoption of MS&E's forecasts will ensure PG&E's ability to deliver, maintain, test, and continually improve upon its metering products and services, which are foundational to a quality customer experience through the timely recording, collection, and delivery of accurate usage and billing data.

2. Summary of Request

PG&E requests that the Commission approve the following:

- Adopt the expense forecasts in Section A.2, Table 7-1.
- Adopt the capital expenditure forecasts in Section A.2, Table 7-2.

TABLE 7-1
METERING SERVICES AND ENGINEERING
EXPENSE BY MWC
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	AB	Misc Expense	–	–	–	–	–	$158	–	$863
2	EY	Change/Main Used Elec Meter	$796	$994	$759	$680	$651	803	$818	1,218
3	EZ	Manage Var Cust Care Processes	580	341	–	1	145	191	22	123
4	HY	Change/Maint Used Gas Meters	7,176	6,272	6,691	4,685	4,413	5,220	5,364	5,528
5	IG	Manage Var Bal Acct Processes	–	–	153	17	40	–	–	–
6	JV	Maintain IT Apps & Infra	–	–	–	1	–	–	–	–
7		Total	$8,552	$7,607	$7,602	$5,384	$5,248	$6,373	$6,204	$7,733

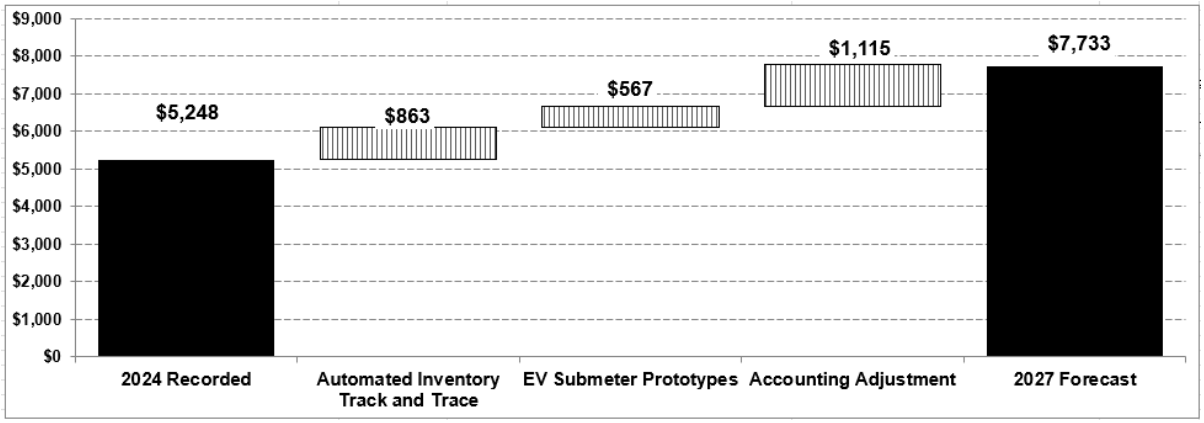
TABLE 7-2
METERING SERVICES AND ENGINEERING
CAPITAL BY MWC
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast					
			2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
1	05	Tools & Equipment	$106	$80	$56	$72	$18	$1,100	$100	$100	$100	$100	$100
2	21	Misc. Capital	151	382	12	–	968	–	430	1,743	(4,460)	(9,438)	(14,946)
3	25	Install New Electric Meters	31,325	27,879	34,447	29,176	31,534	32,642	29,597	33,614	34,766	35,816	36,912
4	2F	Build IT Apps & Infra	–	–	39	–	34	–	–	–	–	–	–
5	3M	Install/Repl Var Bal Acct	–	–	5,878	5,463	11,169	6,900	6,500	11,319	16,646	21,440	26,503
6	74	Install New Gas Meters	84,585	79,951	82,556	67,138	61,030	69,951	68,776	87,419	89,010	82,796	87,716
7		Total	$116,166	$108,291	$122,987	$101,849	$104,753	$110,593	$105,403	$134,195	$136,062	$130,714	$136,285

a. Expense

Figure 7-1 provides an expense walk that identifies the key drivers for the $2.5 million increase in PG&E's 2027 expense forecast of $7.7 million compared to 2024 recorded costs of $5.2 million. Each key driver is summarized below.

FIGURE 7-1
METERING SERVICES AND ENGINEERING
EXPENSE WALK (2024-2027)
(THOUSAND OF NOMINAL DOLLARS)

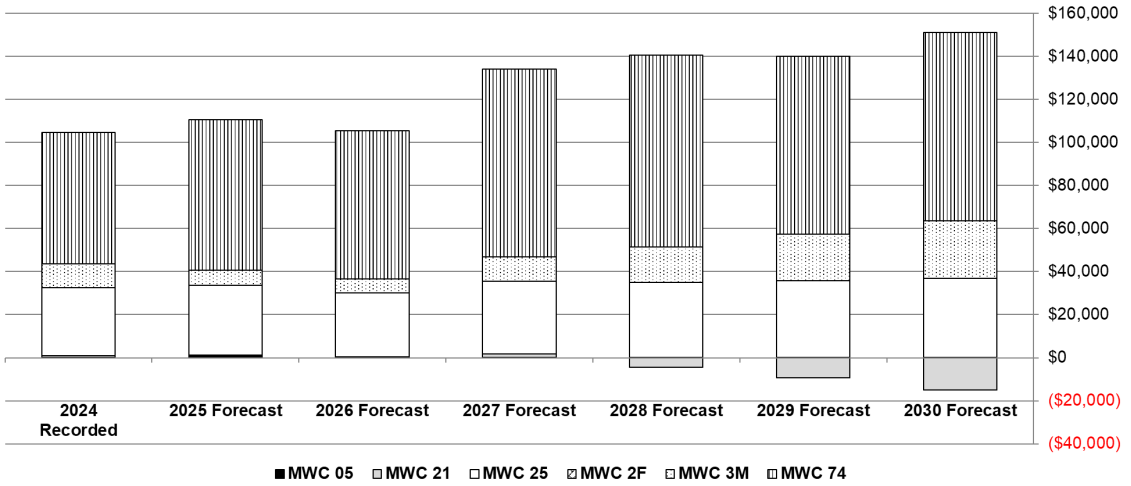


Note: $0.8 million increase in MWC AB due to increased Automated Inventory Track and Trace (AIT&T) license and cellular service costs.

b. Capital

Figure 7-2 provides a capital walk that identifies the key drivers for the $29.4 million increase in PG&E's 2027 capital expenditures forecast of $134.2 million compared to 2024 recorded costs of $104.8 million. Each key driver is summarized below.

FIGURE 7-2
METERING SERVICES AND ENGINEERING
CAPITAL WALK (2024-2030)
(THOUSAND OF NOMINAL DOLLARS)



- $26.4 million increase in MWC 74 to scale gas ultrasonic meters (USM) deployment,[1] improve large gas meter communication, and replenish gas bulk module inventory needed for gas meter combo integration;[2]
- $2.1 million increase in MWC 25 to replenish electric meter inventory,[3] and
- $0.8 million increase in MWC 21 to purchase equipment for the Automated Inventory Track and Track (AIT&T) project.

---

1 PG&E plans to begin scaling-up Gas USMs in the GRC 2027 timeframe and the deployment costs are forecasted in this Chapter. Reference Comprehensive Gas AMI Application (A.) 24-03-011 filed with the CPUC in March 2024 for information on PG&E's USM pilot implemented between 2023-2026.

2 PG&E purchases fully integrated gas meters that are manufactured with a gas module externally pre-attached to each gas meter. The procurement process involves purchasing bulk gas modules which are shipped to gas meter vendors so that they can furnish PG&E with a fully integrated gas meter that includes a pre-attached module. These gas meters are deployed as part of the Company's Gas Meter Maintenance Program as described in Section 5 of this chapter.

3 PG&E purchases electric meters from vendors to support electric meter break-fix maintenance exchanges (aka corrective maintenance) and new business installations as described in PG&E, Exhibit (PG&E-4), Ch. 13, Field Metering. Additionally, the meter purchase costs to support the Company's strategic deployment of newer Electric AMI 2.0 Meters are outside the scope of this chapter and can be referenced in PG&E, Exhibit (PG&E-6), Ch. 9, Electric AMI.

B. Metering Services and Engineering Expense Forecast

This section describes the expense forecast for Metering Services and Engineering activities, which includes support for the Automated Inventory Track and Trace (AIT&T) Project (MWC AB), Electric Meter Maintenance (MWC EY), SmartMeter Opt-Out Program and Supplemental Utility Meter Engineering Support (MWC EZ), and Gas Meter Maintenance (MWC HY). PG&E discusses these activities, the need for the work and customer benefits, and the drivers of the 2027 forecast in further detail below.

1. Automated Inventory Track and Trace (AIT&T) (MWC AB)

a. Overview

Automated Inventory Track and Trace (AIT&T) project activities in MWC AB include software licenses for robot and demo application and cellular services.

b. Costs and Forecast

Table 7-3 identifies the forecast (2025-2027) costs for AIT&T project activities. PG&E did not record costs for these activities from 2020-2024. PG&E's 2027 forecast for MWC AB activities is $0.9 million, which is based on vendor quotes for software licenses for robot and demo application, and cellular services.

TABLE 7-3
METERING SERVICES AND ENGNEERING
HISTORICAL AND FORECAST EXPENSE – MWC AB
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	AB	–	–	–	–	–	$158	–	$863
2	Total	–	–	–	–	–	$158	–	$863

2. Electric Meter Maintenance (MWC EY)

a. Overview

Electric Meter Maintenance activities in MWC EY include support for meter programming, metering system equipment inspection and maintenance, metering system troubleshooting and root cause analysis,

and metering system accuracy testing. Customers will benefit from the proactive prevention of escalation in operational costs to ensure an accurate billing system, and reduction of billing escalations.

b. Forecast

Table 7-4 identifies the historical (2020-2024) and forecast (2025-2027) costs for Electric Meter Maintenance activities:

TABLE 7-4
METERING SERVICES AND ENGINEERING
HISTORICAL AND FORECAST EXPENSE – MWC EY
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	EY	$796	$994	$759	$680	$651	$803	$818	$1,218
2	Total	$796	$994	$759	$680	$651	$803	$818	$1,218

PG&E's 2027 forecast for MWC EY activities is $1.2 million, which is $0.6 million greater than 2024 recorded adjusted costs of $0.7 million. These costs are higher than 2024 recorded costs because they include additional budget for electric vehicle (EV) submetering costs. EV submetering is a new initiative that will provide customers with a technical solution that is fully integrated with PG&E's AMI data and billing system, allowing customers to more easily manage their energy usage. There are no other noteworthy trends in spending in this MWC, as from 2020 to 2024, recorded costs did not vary significantly.

3. SmartMeter Opt-Out Program and Supplemental Utility Meter Engineering Support (MWC EZ)

a. Overview

MWC EZ includes support for the SmartMeter Opt-Out Program oversight and supplemental utility meter engineering support.

Meter engineering support is required to ensure that PG&E can provide the correct opt-out meter to the customer's premises. Meter engineering support is required to procure, certify and provide engineering expertise to the field installation team to solve unique

customer configurations and metering needs. The meter engineering team is also required to provide any meter accuracy tests requested by customers. Please see Exhibit 4, Chapter 13, Workpaper 13-9 for a summary of opt-out work.

b. Costs and Forecast

Table 7-5 identifies the historical (2020-2024) and forecast (2025-2027) costs for SmartMeter Opt-Out Program and Supplemental Utility Meter Engineering Support activities:

TABLE 7-5
METERING SERVICES AND ENGINEERING
HISTORICAL AND FORECAST EXPENSE – MWC EZ
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	$580	$341	–	$1	$145	$191	$22	$123
2	Total	$580	$341	–	$1	$145	$191	$22	$123

PG&E's 2027 forecast for MWC EZ activities is $0.1 million, which is based on PG&E's 2024 recorded costs of $0.1 million. These costs enable PG&E's Metering Services and Engineering team to coordinate with the SmartMeter Opt-Out program, which is forecasted within Field Metering. From 2020 to 2022, recorded costs in MWC EZ steadily decreased from $0.6 million due to lower customer opt-outs. PG&E does not forecast 2027 costs to vary significantly from 2024 recorded costs.

4. Gas Meter Maintenance (MWC HY)

a. Overview

MWC HY includes gas meter preventive maintenance, gas meter corrective maintenance, and the associated staff support necessary to effectively perform these activities. These activities ensure our customers' meters are performing accurately as required by General Order 58-A.

b. Costs and Forecast

Table 7-6 identifies the historical (2020-2024) and forecast (2025-2027) costs for Gas Meter Maintenance activities:

TABLE 7-6
METERING SERVICES AND ENGINEERING
HISTORICAL AND FORECAST EXPENSE – MWC HY
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	HY	$7,176	$6,272	$6,691	$4,685	$4,413	$5,220	$5,364	$5,528
2	Total	$7,176	$6,272	$6,691	$4,685	$4,413	$5,220	$5,364	$5,528

PG&E's 2027 forecast for MWC HY activities is $5.5 million, which is $1.1 million greater than 2024 recorded adjusted costs of $4.4 million. This increase is partially due to cost escalations but is also largely due to spending fluctuations not attributable to any particular driver such as accounting adjustments. For example, PG&E found capital-related work charged to expense and this was adjusted back to capital in 2024. PG&E's 2027 forecast ($5.5 million) roughly matches the annual recorded costs in this MWC from 2020-2024 ($5.8 million).

C. Metering Services and Engineering Capital Forecast

1. Tools and Equipment (MWC 05)

a. Overview

MWC 05 includes tools and equipment necessary to perform all field metering troubleshooting, meter maintenance, meter repair, meter quality assurance testing, and meter testing activities.

b. Costs and Forecast

Table 7-7 identifies the historical (2020-2024) and forecast (2025-2030) costs for tools and equipment.

TABLE 7-7
METERING SERVICES AND ENGINEERING
HISTORICAL AND FORECAST CAPITAL – MWC 05
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast					
		2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
1	05	$106	$80	$56	$72	$18	$1,100	$100	$100	$100	$100	$100
2	Total	$106	$80	$56	$72	$18	$1,100	$100	$100	$100	$100	$100

PG&E forecasts $0.1 million annually from 2027 to 2030 in MWC 05. These costs support customers by ensuring an adequate supply of tools and spare parts to support meter inspection, troubleshooting, repair, and testing. PG&E developed its 2027 forecast based on an average of 2020-2024 recorded costs because costs for tools and equipment have not varied significantly over the last five years and PG&E does not anticipate significant cost increases in 2027. PG&E notes that it is forecasting a one-time increase of $1 million in 2025 to replace obsolete transfer provers used to test rotary and turbine gas meters.

2. Miscellaneous Capital (MWC 21)

a. Overview

Miscellaneous Capital includes the net costs and savings to expand PG&E's Automated Inventory Track and Trace (AIT&T) project. This project assigns an RFID tracker or similar technology to a large quantity of its gas and electric meters, and non-metering assets such wood poles, transformers, or gas regulators. This allows inventory location to be tracked and traced in near-real time as it physically moves through different locations, improving the accuracy of PG&E's inventory. The cost of locating the exact location of equipment is expensive; hence, the ability to track and trace each inventory's location stands to reduce costs in several ways. First, jobs and delivery times can be optimized by knowing exactly where and how many meters are in stock. Second, inventory can be replenished before any materials are out of stock, which minimizes project delays. Finally, inventory can be ordered as needed, reducing excess reserves, and minimizing obsolescence. All of

these benefits allow PG&E to maintain and replace its meters and non-metering inventory at lower costs to customers.

PG&E requests approximately $1.7 million in 2027 to roll out this project across four distribution centers, 75 service centers, and roughly 3,000 service vehicles through 2030, which is expected to realize roughly $28.8 million from 2028-2030 in cost reductions. The completion of this project projects to generate $21.8 million in annual cost reductions, less maintenance costs. MWC 21 shows the net costs (costs less savings) of the project.

b. Costs and Forecast

Table 7-8 identifies the historical (2020-2024) and forecast (2025-2030) costs for miscellaneous capital. In the section below, PG&E describes variances between historical and forecast costs for these activities, including key drivers of decreases or increases between 2024 recorded adjusted costs and the 2027 forecast.

TABLE 7-8
METERING SERVICES AND ENGINEERING
HISTORICAL AND FORECAST CAPITAL – MWC 21
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast					
		2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
1	21	$151	$382	$12	–	$968	$(44)	$430	$1,743	$(4,460)	$(9,438)	$(14,946)
2	Total	$151	$382	$12	–	$968	$(44)	$430	$1,743	$(4,460)	$(9,438)	$(14,946)

From 2020 to 2023, recorded costs in MWC 21 were minimal as PG&E was largely exploring the viability of the AIT&T program. In 2024, costs increased to $1.0 million to conduct additional proof of concept testing. PG&E expects to deploy the AIT&T technology to a small number of yards in 2025 and 2026, with a much larger annual deployment starting in 2027.

PG&E expects to incur increased startup costs in 2027 to implement this project; however, the project is projected to deliver net cost reductions after 2028. PG&E expects roughly flat costs annually from 2027 through 2030; however, savings are cumulative as AIT&T is

deployed to more yards, resulting in savings scaling up annually after 2027. Workpaper 7-11 shows PG&E's estimates of annual costs and savings from 2027 through 2030.[4]

These costs will be used to purchase and install equipment needed to implement AIT&T, including but not limited to:

- Inventory tags and/or beacons for individual metering and non-metering commodity; and
- Vendor resources for installation, consulting, testing, project paperwork, and various other tasks pertaining to the project implementation.

By investing in this proven technology, AIT&T stands to deliver waste elimination savings in numerous categories including, but not limited to:

- Reduction in excess inventory purchase, manual cycle counting, wasted time spent searching for inventory and wasted truck rolls showing up with the wrong items;
- Improved inventory trace with service centers and service trucks;
- On-time construction project execution; and
- Creation of automated inventory reports, eliminating manual intervention.

PG&E believes that the substantial savings projected by AIT&T in 2028 and beyond more than justify the forecast costs in 2027. Funding waste elimination projects like AIT&T allows PG&E to deliver essential metering services at lower costs to customers.

3. Backup Power Transfer Meter (MWC 3M)

a. Overview

Capital activities in MWC 3M include the costs to implement the Backup Power Transfer Meter (BPTM) program. The BPTM is a device designed by PG&E and manufactured by a third party supplier that enables customers to safely, easily, and affordably connect a wide variety of backup power sources directly through the electric collar meter. This meter collar enables customers to remain energized during

[4] Exhibit (PG&E-6), WP 7-11.

outages without needing to install costly permanent backup power solutions.

Utility customers across the nation are increasingly facing power outages due to natural disasters impacting the electric grid. Many of these customers, including the most vulnerable, are not in a position to afford costly permanent backup power solutions such as solar with battery backup or permanent backup generator installations. The BPTM is a patented device designed by PG&E, for PG&E customers, to solve this problem. It is the result of several years of improved design and testing in collaboration with third party consultants and manufacturers.

PG&E has developed and deployed nearly 7,400 BPTM devices to our customers since 2021. Specifically, PG&E offers the BPTM to select customers who are in High Fire Threat Districts (HFTDs) or are served by an Enhanced Powerline Safety Setting (EPSS) circuit. This solution has been well-received by customers for ease of use, low cost, and ability to choose from a wide variety of backup power sources, such as a generator, rechargeable battery, or hybrid/all electric vehicle, directly plugged into the meter. Because it is connected via a single cable, it is not typically necessary to modify wiring behind the customer service panel.

The BPTM also offers many advantages from a safety and implementation perspective. For example, the BPTM has intelligent switching capabilities and will automatically switch back to the utility power once grid-based power has been restored. It also utilizes technology to minimize its form factor and cost while maximizing its versatility and safety through internal health checks. Its microprocessor-based machine monitors operational conditions including possible component failure, unintended usage, or misapplication, and will safely shut down the device if an abnormality is detected. In collaboration with a third-party consultant, PG&E has tested BPTM for harsh conditions beyond what is recommended by product safety standards such as the American Society for Testing and Materials (ASTM). It has been field tested by PG&E and the consultant

since 2021, and its design has been reviewed and improved over that time.

PG&E is forecasting $11.3 million in 2027 to implement the BPTM program, which will continue to provide the BPTM to select customers in HFTDs or on EPSS circuits and improve their resiliency to outages. BPTM has demonstrated its ability to keep customers energized with low implementation costs.

b. Forecast

Table 7-9 identifies the historical (2020-2024) and forecast (2025-2030) costs for Backup Power Transfer Meter activities.

TABLE 7-9
METERING SERVICES AND ENGINEERING
HISTORICAL AND FORECAST CAPITAL – MWC 3M
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast					
		2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
1	3M	–	–	$5,878	$5,463	$11,169	$6,900	$6,500	$11,319	$16,646	$21,440	$26,503
2	Total	–	–	$5,878	$5,463	$11,169	$6,900	$6,500	$11,319	$16,646	$21,440	$26,503

Recorded costs in MWC 3M have varied between $5 million and $11 million per year since 2020.[5] Costs were approximately $5 million in 2022 and 2023 to launch the offering and were associated with approximately 2,000 BPTM installations per year. In 2024, a Public Safety Power Shutoff event caused PG&E to more closely examine its backup power services to its most vulnerable customers; PG&E identified the BPTM as an effective option for keeping customers connected to power during outages. As a result, BPTM costs increased to $11 million in 2024 to purchase and install additional BPTM devices for these customers. PG&E anticipates a return to a more gradual ramp-up in BPTM costs, as shown by the more uniform annual increases in the forecast years as discussed below.

[5] Recorded costs for MWC 3M have been booked to the Wildfire Mitigation Plan Memorandum Account (WMPMA); PG&E is proposing MWC 3M costs for inclusion in the 2027 GRC forecast.

Forecast costs in MWC 3M increase roughly $5 million per year starting in 2027 through 2030. This budget is needed to increase capacity and meet customer demand for BPTM installations. Every year since the program's inception, PG&E has had to cease offering installations mid-year due to customer demand outpacing PG&E's capacity to conduct installations. As Workpaper 7-12 shows, customer demand for BPTMs has grown rapidly, and despite PG&E's efforts to scale up installations, current funding levels are insufficient to meet that demand. By increasing funding, PG&E can possibly offer BPTM as a steady-state offering and provide a backup power solution to customers. PG&E is targeting 6,000 installations in 2025 and anticipates 20,000 installations per year by 2030.

4. Install New Electric Meters (MWC 25)

a. Overview

Electric Metering Capital activities in MWC 25 include new electric meter purchases for new customer growth (i.e., new business) and the replacement of failed units (i.e., break-fix maintenance or corrective maintenance) and meter retirements. This MWC also includes new purchases for substation class metering transformers. With an inventory level of this class of meter transformers, PG&E can greatly increase the response time when replacement is needed for our largest energy-consuming customers. Long lead times (52+ weeks) for procurement of these units will no longer have an impact on the customer's bill and can shorten the estimation period.

This MWC also includes new sub-meters used for electric vehicle service equipment (EVSE). These new sub-meters are an approved technical solution developed and funded under the Electric Program Investment Charge (EPIC)[6] program and allow for seamless, automated

[6] The Commission established the Electric Program Investment Charge (EPIC) in 2011 (D.11-12-035 Ph. 1) and (D.12-05-037 Ph. 2) renewed the program in 2020. The Commission's mission for EPIC is to "invest in innovation to ensure equitable access to safe, affordable, reliable, and environmentally sustainable energy for electricity ratepayers." In D.21-11-028, the Commission instructed PG&E, along with Southern California Edison and San Diego Gas & Electric, to each file an EPIC Investment Plan Application covering the years 2021-2025 (this period is known as EPIC 4).

data transfer that is integrated with our current AMI and billing systems. This solution can reduce operational costs for manual billing, processing, and verification of third-party metering data.

b. Costs and Forecast

Table 7-10 identifies the historical (2020-2024) and forecast (2025-2030) costs for Install New Electric Meters activities.

TABLE 7-10
METERING SERVICES AND ENGINEERING
HISTORICAL AND FORECAST CAPITAL – MWC 25
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast					
		2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
1	25	$31,325	$27,879	$34,447	$29,176	$31,534	$32,642	$29,597	$33,614	$34,766	$35,816	$36,912
2	Total	$31,325	$27,879	$34,447	$29,176	$31,534	$32,642	$29,597	$33,614	$34,766	$35,816	$36,912

Recorded costs in MWC 25 have ranged roughly between $27.9 million and $34.4 million per year since 2020. The increases from 2021 to 2022 were due to missed deliveries by supplier that carried over to 2022 and price increases from suppliers due to material and labor impacts. The decrease from 2022 to 2023 was driven by lower purchase volume based on inventory levels.

Forecast costs in MWC 25 for the 2027-2030 period range roughly between $33.6 million and $36.9 million. The forecasted decrease in 2026 is due to a one-time reduction for safety stock inventory. Neither recorded costs nor forecast costs for MWC 25 fluctuate significantly year-over-year because costs are largely volume-driven.

5. Gas Meter Exchanges and Inventory Purchases (MWC 74)

a. Overview

MWC 74 includes costs to purchase new fully-integrated gas meters and the associated labor necessary to perform gas meter installations, exchanges, removals, and retirements for gas meter preventative maintenance, corrective maintenance, and new business. This chapter *excludes* incremental inventory and the labor costs associated with replacing the Company's gas modules that have reached or will reach

its lifespan and costs for certain gas meter replacements that are driven by a gas module failure. Exhibit (PG&E-6), Chapter 8, discusses information and costs associated with the Company's plans to replace its gas modules that have reached or will reach their lifespan.

b. Costs and Forecast

Table 7-11 identifies the historical (2020-2024) and forecast (2025-2030) costs for Gas Meter Exchanges and Inventory Purchases.

TABLE 7-11
METERING SERVICES AND ENGINEERING
HISTORICAL AND FORECAST CAPITAL – MWC 74
(THOUSAND OF NOMINAL DOLLARS)

		Recorded Adjusted					Forecast					
Line No.	MWC	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
1	74	$84,585	$79,951	$82,556	$67,138	$61,030	$69,951	$68,776	$87,419	$89,010	$82,796	$87,716
2	Total	$84,585	$79,951	$82,556	$67,138	$61,030	$69,951	$68,776	$87,419	$89,010	$82,796	$87,716

Recorded costs in MWC 74 have ranged roughly between $61.0 million and $84.6 million per year since 2020. Lower costs from 2023 to 2026 are largely due to warranty claims with vendors, lower-than-anticipated new business installations, and delay of vendor meter deliveries.

PG&E forecasts $87.4 million for Gas Meter Exchanges and Inventory Purchases in 2027 and a total of $388.8 million from 2027-2030. PG&E's 2027 forecast of $87.4 million is $26.4 million higher than 2024 recorded costs of $61.0 million due to scaling-up gas ultrasonic meters ($2.1 million), improved large gas meter communication ($5.3 million), and increased gas meter combo and bulk module inventory ($8.3 million). Each of these factors is discussed below.

1) Gas Ultrasonic Meters

Following completion of a pilot by 2026, PG&E intends to scale-up the installation of gas ultrasonic meters (USMs) beginning in 2027 and beyond. These newer generation gas meters represent the latest proven technology and have several advantages over the

traditional diaphragm meters. First, ultrasonic meters have additional safety features and self-diagnostics that can protect customers, service personnel, or customer assets as they feature pressure and temperature sensors that can automatically shut off if pressure, flow, or temperature falls outside of a specified range. Second, USMs have no moving parts susceptible to environmental extremes which makes them accurate and durable compared to legacy diaphragm gas meters. Third, USMs have the capability to measure natural gas with a hydrogen blend up to 20 percent in the gas distribution system.[7] Finally, USMs are lighter and easier to transport, which can reduce transportation costs, maintenance/installation times and reduce employee strains and sprains.

As PG&E continually monitors industry trends, the Company observes that meter manufacturers are starting to decrease the production of traditional diaphragm gas meters and transition to the newer gas USM technology that offers numerous customers benefits. PG&E expects that the cost of the traditional diaphragm meters will begin to increase as manufacturers start to phase out these meters in favor of USMs.

PG&E believes that scaling up this gas USM transition starting in 2027 is optimal for enhancing customer safety, gas meter operations/maintenance programs and trending down long-term costs.

2) Large Gas Meter Communication

Another driver of the 2027 forecast is an improvement for PG&E's largest customers with improved enhancement to large gas meter technology. Approximately 2,000 of PG&E's largest customers have throughput exceeding an average of 1,000,000 cubic feet per month, requiring compensation for fluctuations in temperature. A few examples of these customers are refineries, nut

---

7 The energy grid of the future will need to leverage more clean energy like wind and solar, but also renewable gases like biogas and hydrogen.

dryers, hospitals, tech companies, or food packing industries. To accomplish this, PG&E installs and regularly maintains Electronic Correctors (ECs) at each of these sites. These ECs require communication to allow the customers and PG&E to receive hourly usage daily. Customers use this information to forecast their energy usage and improve their operations, such as comparing shift productivities for the day. PG&E also uses this information on the coldest days of the year to ensure the system can operate safely and all customers have enough gas.

These customers expect PG&E to provide the usage daily and rely on this for their continued operation. With the legacy devices, called “Mini-AT” installed between 2012-2014, the customers have experienced an increased number of data gaps caused by non-communicating ECs or equipment failures. PG&E identifies these failures, sends a technician to visit these sites, and troubleshoots/corrects the issue. Some of the sites are visited multiple times per year as the equipment nears the end of its useful life creating costly troubleshooting and corrective maintenance truck rolls as well as poor customer experience with delayed hourly energy information.

These “Mini-AT” devices are approaching the end of their useful life and has been sunset by its manufacturer in 2020. PG&E proposes to enhance the customer experience for locations with the most troublesome units and the oldest equipment with more reliable equipment such as the newer Honeywell EC350 or comparable certified device.

3) Bulk Gas Module/Meter Combo Inventory

An additional factor contributing to the increased 2027 capital forecast is due to PG&E restocking its supply of gas bulk modules for gas meter suppliers. As described earlier in this Chapter, PG&E receives fully integrated gas meters from its vendors. Each gas meter is manufactured by vendors to include a gas module that is externally pre-attached to the meter. This process involves purchasing bulk gas modules which are shipped to gas meter

vendors so that they can furnish PG&E with fully integrated gas meters that come with a pre-attached module on the gas meter. This gas meter inventory supports the Company's gas meter maintenance program that was described earlier in this chapter.

To maintain budget efficiency, PG&E has scaled back gas meter purchase from 2024 through 2026, which has kept bulk module purchasing costs down. However, PG&E anticipates exhausting the existing inventory by 2026; as a result, PG&E will need to restock its inventory supply starting in 2027. This is necessary because if PG&E lacks the budget to replenish its inventory, there may be work disruptions and delays with gas meter deliveries which could result in delays in gas meter maintenance at the customer's premises. PG&E does not expect that the unit costs will increase beyond standard escalation.

D. Compliance with Prior Commission Decisions

1. SmartMeter Opt-Out

D.14-12-078[8] requires PG&E to provide a summary of costs incurred and revenues collected associated with providing the Opt-Out service option. See Exhibit 4, Chapter 13 workpapers for the summary of costs incurred, and see Workpaper 7-13 for a summary of billed revenues associated with the SmartMeter "opt billed" revenues associated with the SmartMeter Opt-Out Program.

Additionally, D.14-12-078 requires PG&E to propose any future adjustments to the opt-out charge or monthly fees to account for over-or under-collections as part of its GRC application filing.[9] Currently, PG&E proposes no adjustments to the SmartMeter Opt-Out initial enrollment charge or the monthly fees to account for the under-collection.

---

8 D.14-12-078, p. 79, Ordering Paragraph (OP) 6.

9 D.14-12-078, pp. 78-79, OP 5.

2. SmartMeter Cost Effectiveness Update

Decision (D.) 17-05-013 ordered PG&E to prepare a complete update of the costs and benefits in Tables 3 and 4 from D.09-03-026, relating to the SmartMeter Upgrade Program (Application 07-12-009).

> Pacific Gas and Electric Company (PG&E) shall submit an updated version of its 'SmartMeter Cost Effectiveness Update' as a stand-alone exhibit in each General Rate Case Phase 1 application that it files after the effective date of this decision. In doing so, PG&E shall not alter the format, or the level of detail used in Exhibit PG&E-47 in the instant proceeding, unless it is to add detail.[10]

PG&E provides the stand-alone SmartMeter Cost Effectiveness Update in Attachment A of this chapter. PG&E notes that the costs and benefits have not substantially changed since 2017 and believes it has demonstrated that the Upgrade is a worthwhile investment of ratepayer funds. As such, PG&E is respectfully requesting to discontinue the inclusion of the SmartMeter Cost Effectiveness Update in future GRCs.

3. Future SmartMeter Updates

Since 2020, the number of customer SmartMeter opt-outs has steadily decreased. As a result, the costs incurred and revenues collected resulting from the out-out offering have been minimal. SmartMeters have now been deployed to 99.2 percent of PG&E customers, and PG&E does not anticipate opt-outs to increase. PG&E provided SmartMeter cost-effectiveness updates in its 2017, 2023, and now 2027 GRC applications. In light of these updates, it may be of limited utility to provide either a summary of costs incurred and revenues associated with the opt-out service option, or updated cost-effectiveness information, in future GRC testimony. In the interest of efficiency, PG&E respectfully proposes that this be the final time these data be reported in testimony.

E. Conclusion

Based on the evidence discussed above and the associated attachments and workpapers, PG&E requests that the Commission approve the forecasts presented in this chapter for MS&E.

---

10 D.19-10-038, p. 16, OP 1.

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 7

ATTACHMENT A

SMARTMETER™ COST EFFECTIVENESS UPDATE

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 7
ATTACHMENT A
SMARTMETER™ COST EFFECTIVENESS UPDATE

TABLE OF CONTENTS

A. Introduction 7-1

B. Updated Tables 3 and 4 From D.09-03-026 7-1

1. Summary of Costs and Benefits From Updated Tables 3 and 4 7-2

2. Updated Tables 3 and 4 From D.09-03-026 7-3

3. New Tables 3A and 4A With Comparison to 2017 Update 7-5

4. Narrative Explanations of Line Items in Updated Tables 3A and 4A 7-7

a. Table 3A – Narrative Explanations 7-7

b. Table 4A – Narrative Explanations 7-9

C. Additional Unquantified Benefits 7-12

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 7
ATTACHMENT A
SMARTMETER™ COST EFFECTIVENESS UPDATE

A. Introduction

In the 2017 Pacific Gas and Electric Company (PG&E) General Rate Case (Application (A.)15-09-001, GRC), PG&E filed Exhibit (PG&E-47) in Compliance with Ordering Paragraph (OP) 20 of California Public Utilities Commission Decision (D.) 17-05-013 (the 2017 Update). That decision ordered PG&E to prepare a complete update of the costs and benefits in Tables 3 and 4 from D.09-03-026, relating to the SmartMeter™[1] Upgrade (SMU) Program (A.07-12-009).

This testimony is prepared as directed in OP 1 of D.19-10-038 Regarding Compliance Matter in Phase 1 of the 2017 PG&E GRC. OP 1 states:

> Pacific Gas and Electric Company (PG&E) shall submit an updated version of its 'SmartMeter Cost Effectiveness Update' as a stand-alone exhibit in each General Rate Case Phase 1 application that it files after the effective date of this decision. In doing so, PG&E shall not alter the format or the level of detail used in Exhibit PG&E-47 in the instant proceeding, unless it is to add detail.[2]

PG&E provided an update of the 2017 Update in the 2023 Pacific Gas and Electric Company (PG&E) General Rate Case (Application (A.)21-06-021, GRC) in Exhibit (PG&E-6), Chapter 7A (the 2023 Update).

Section B of this report includes the current analysis (the 2027 Update).

Section C provides an overview of other benefits that PG&E considers an important aspect of evaluating the value of SMU technology.

B. Updated Tables 3 and 4 From D.09-03-026

This section includes: (1) a summary of the results including key drivers comparing the original SMU analysis with the three subsequent Updates;

---

1 SmartMeter is a PG&E registered trademark. All further references to SmartMeters in PG&E's testimony in this proceeding should be assumed to refer to the trademarked name, without continually using the ™ symbol, consistent with legally-acceptable practice.

2 D.19-10-038, p. 16, OP 1.

(2) updated Tables 3 and 4 from D.09-03-026 comparing the original SMU Program Adopted values to the 2027 Update; (3) Tables 3A and 4A, which compare the 2023 Update to the 2027 Update; and (4) narrative explanations for each line item in the updated tables, describing the changes since the 2023 Update.

1. Summary of Costs and Benefits From Updated Tables 3 and 4

As described below, PG&E updated previous forecasts for the years 2017-2020 with actual data where applicable. PG&E also updated forecasts for SmartMeter meter deployment for new customer growth, usage of integrated Remote Connect and Disconnect (RCD) switches and the related benefits, and the implementation costs and program benefits of Time-of-Use (TOU) programs based on the latest available information. As shown in Table -1 below, Total Costs have increased slightly, and Total Benefits have decreased slightly from the 2023 Update:

TABLE 7A-1
(TABLE 1)
SUMMARY COMPARISON
(THOUSANDS OF DOLLARS)

		Incremental Present Value of Revenue Requirement (PVRR)			
		Original SMU Decision	2017 Update	2023 Update	2027 Update
Line No.	Description	D.09-03-026	2017 GRC, Exh-47	2023 GRC, Exh-6, Ch-7A	2027 GRC, Exh-6, Ch-7A
1	Total Costs (Table 3)	$749,015	$575,734	$576,676	$574,973
2	Total Benefits (Table 4)	(779,621)	(296,951)	(286,381)	(278,654)
3	Excess Costs/(Benefits)	$(30,606)	$278,783	$290,295	$296,319

The PVRRs of Costs decreased from $576.7 million in the 2023 Update to $575.0 million in the 2027 Update. As described below, this is driven by slightly lower on-going costs for Meter Devices for new customers, TOU Program costs, and Operations and Maintenance costs, all primarily resulting from the lower forecasted new customer growth rates relative to the 2023 Update.

The PVRR of Benefits decreased from ($286.4 million) in the 2023 Update to ($278.7million) in the 2027 Update. The decline is primarily

related to reductions in the usage of RCD switches related to moratoriums associated with California wildfires and coronavirus (COVID-19), which lasted longer than was forecasted in the 2023 Update, as well as public policy targets to reduce customer disconnections for non-payment. The reduction related to RCD switches was offset by a slight increase in the value of energy conservation benefits associated with TOU programs based on increases in the Power Price Forecast.

2. Updated Tables 3 and 4 From D.09-03-026

Table 7A-2 (updated Table 3) and Table 7A-3 (updated Table 4) below provide: (1) cost or benefit information from D.09-03-026, which PG&E has converted to a PVRR;[3] (2) updated cost or benefit information, which PG&E has also converted to PVRR; and (3) a "Status" column, which identifies whether the 2027 Update line item was revised, remains unchanged, or represents an added item compared to the original line items adopted in D.09-03-026.

[3] Table 7A-2 includes two columns. The "Nominal" column represents the incremental costs of the SMU to be funded by the SmartMeter project (Project Costs). The "PVRR" column represents the Present Value of the Revenue Requirements associated with those nominal Project Costs, as well as the PVRR associated with the forecast ongoing costs of operating and maintaining the program over its useful life.

In Table 7A-3, the "Annualized" column represents the estimated annual amount of operational benefits at the completion of the project, in 2008 dollars. The PVRR column represents the PVRRs for all benefit streams over the 20-year life of the program.

TABLE 7A-2
(TABLE 3 FROM D.09-03-026)
ADOPTED AND UPDATED ESTIMATES OF ALLOCATED INCREMENTAL COSTS
(THOUSANDS OF DOLLARS)

Line No.		Incremental Costs				Status Compared to Original SMU Dec.
		From SMU Decision p. 151 of D.09-03-026		2027 Update See WP 7A-1 to 7A-2		
		Nominal	PVRR	Nominal	PVRR	
1	Deployment Costs					
2	Meter Devices (Less Home Area Network (HAN) and Electromechanical Meter Upgrades)	$310,757	$486,358	$325,116	$404,654	Revised
3	HAN Retrofit	26,532	24,581	21,846	24,947	Revised
4	Electromechanical Meter Retrofit	18,800	20,372	22,485	25,677	Revised
5	Information Technology (IT)	33,600	49,793	22,583	26,610	Revised
6	Title 24 Program Costs	–	26,174	–	–	Revised
7	Peak-Time Rebate Program Costs	–	27,592	–	–	Revised
8	TOU Program Costs	n/a	n/a	–	65,277	Added
9	Project Management	–	–	–	–	Unchanged
10	Training	1,697	1,592	1,697	1,592	Unchanged
11	Risk Based Allowance	44,139	46,724	–	–	Revised
12	Subtotal	$435,525	$683,186	$393,728	$548,757	–
13	Operations and Maintenance Costs					
14	Operations and Maintenance	$4,993	$42,886	$5,978	$15,413	Revised
15	Risk Based Allowance	562	503	–	–	Revised
16	Subtotal	$5,555	$43,389	$5,978	$15,413	–
17	Other Costs					
18	Technology Assessment	$21,400	$18,995	$11,344	$10,803	Revised
19	Risk Based Allowance	4,280	3,445	–	–	Revised
20	Subtotal	$25,680	$22,440	$11,344	$10,803	–
21	Total Incremental Costs	$466,760	$749,015	$411,050	$574,973	–

TABLE 7A-3
(TABLE 4 FROM D.09-03-026)
ADOPTED AND UPDATED ESTIMATES OF ALLOCATED INCREMENTAL BENEFITS
(THOUSANDS OF DOLLARS)

Line No.		Incremental Benefits				Status Compared to Original SMU Dec.
		From SMU Decision p. 152 of D.09-03-026		2027 Update		
		Annualized	PVRR	Annualized	PVRR	
1	Operational Benefits					
2	Integrated Connect/Disconnect Switches					
3	Avoided Field Visits	$(6,682)	$(114,702)	$(6,011)	$(54,880)	Revised
4	Improved Cash Flow	(969)	(11,174)	(365)	(1,929)	Revised
5	Reduced Bad Debt	(2,429)	(26,756)	(647)	(3,192)	Revised
6	Tax Benefit from Meter Replacement	n/a	(11,799)	n/a	(11,398)	Revised
7	Projected Additional Tax Benefits	n/a	n/a	n/a	(22,550)	Added
8	Subtotal	$(10,080)	$(164,431)	$(7,024)	$(93,949)	–
9	Energy Conservation/Demand Response Benefits					
10	Electric Conservation	n/a	$(268,847)	n/a	–	Revised
11	Gas Conservation	n/a	–	n/a	–	Unchanged
12	Peak-Time Rebate	n/a	(262,916)	n/a	–	Revised
13	TOU	n/a	–	n/a	$(184,705)	Added
14	Air Conditioning (A/C) Cycling	n/a	(83,427)	n/a	–	Revised
15	Subtotal	n/a	$(615,190)	n/a	$(184,705)	–
16	Total Incremental Benefits	n/a	$(779,621)	n/a	$(278,654)	–

3. New Tables 3A and 4A With Comparison to 2017 Update

Table 7A-4 (New Table 3A) and Table 7A-5 (New Table 4A) below provide the same information as Table 7A-2 (Table 3) and Table 7A-3 (Table 4), but instead of comparing the 2027 Update to the Original SMU Decision, these tables compare the 2027 Update to the 2023 Update. These tables also include the references to Section B4, as the changes in the 2027 Update will be described in relation to the 2023 Update.

TABLE 7A-4
(TABLE 3A)
UPDATED ESTIMATES OF ALLOCATED INCREMENTAL COSTS
(THOUSANDS OF DOLLARS)

Line No.		Incremental Costs				Status Compared to 2023 Update	Section B4 Reference
		Previous (2023 GRC) Exhibit 6, Chapter 7A		Current (2027 GRC) Exhibit 6, Chapter 7A			
		Nominal	PVRR	Nominal	PVRR		
1	Deployment Costs						
2	Meter Devices (Less HAN and Electromechanical Meter Upgrades)	$325,116	$405,907	$325,116	$404,654	Revised	[B]
3	HAN Retrofit	21,846	24,947	21,846	24,947	Unchanged	[A]
4	Electromechanical Meter Retrofit	22,485	25,677	22,485	25,677	Unchanged	[A]
5	IT	22,583	26,610	22,583	26,610	Unchanged	[A]
6	Title 24 Program Costs	–	–	–	–	Unchanged	[A]
7	Peak-Time Rebate Program Costs	–	–	–	–	Unchanged	[A]
8	TOU Program Costs	–	65,721	–	65,277	Revised	[C]
9	Project Management	–	–	–	–	Unchanged	[A]
10	Training	1,697	1,592	1,697	1,592	Unchanged	[A]
11	Risk Based Allowance	–	–	–	–	Unchanged	[A]
12	Subtotal	$393,728	$550,453	$393,728	$548,757	–	
13	Operations and Maintenance Costs						
14	Operations and Maintenance	$5,978	$15,419	$5,978	$15,413	Revised	[B]
15	Risk Based Allowance	–	–	–	–	Unchanged	[A]
16	Subtotal	$5,978	$15,419	$5,978	$15,413	–	
17	Other Costs						
18	Technology Assessment	$11,344	$10,803	$11,344	$10,803	Unchanged	[A]
19	Risk Based Allowance	–	–	–	–	Unchanged	[A]
20	Subtotal	$11,344	$10,803	$11,344	$10,803	–	
21	Total Incremental Costs	$411,050	$576,676	$411,050	$574,973	–	

TABLE 7A-5
(TABLE 4A)
UPDATED ESTIMATES OF ALLOCATED INCREMENTAL BENEFITS
(THOUSANDS OF DOLLARS)

Line No.		Incremental Benefits				Status Compared to 2023 Update	Section B4 Reference
		Previous (2023 GRC) Exhibit 6, Chapter 7A		Current (2027 GRC) Exhibit 6, Chapter 7A			
		Annualized	PVRR	Annualized	PVRR		
1	Operational Benefits						
2	Integrated Connect/Disconnect Switches						
3	Avoided Field Visits	$(6,011)	$(63,968)	$(6,011)	$(54,880)	Revised	[D]
4	Improved Cash Flow	(365)	(1,943)	(365)	(1,929)	Revised	[D]
5	Reduced Bad Debt	(647)	(3,211)	(647)	(3,192)	Revised	[D]
6	Tax Benefit from Meter Replacement	n/a	(11,398)	n/a	(11,398)	Unchanged	[E]
7	Projected Additional Tax Benefits	n/a	(22,623)	n/a	(22,550)	Revised	[F]
8	Subtotal	$(7,024)	$(103,144)	$(7,024)	$(93,949)		
9	Energy Conservation/ Demand Response Benefits						
10	Electric Conservation	n/a	–	n/a	–	Unchanged	[G]
11	Gas Conservation	n/a	–	n/a	–	Unchanged	[H]
12	Peak-Time Rebate	n/a	–	n/a	–	Unchanged	[I]
13	TOU	n/a	$(183,238)	n/a	$(184,705)	Revised	[J]
14	A/C Cycling	n/a	–	n/a	–	Unchanged	[K]
15	Subtotal	n/a	$(183,238)	n/a	$(184,705)		
16	Total Incremental Benefits	n/a	$(286,381)	n/a	$(278,654)		

4. Narrative Explanations of Line Items in Updated Tables 3A and 4A

The following are narrative explanations for each line item in updated Tables 3A and 4A. The purpose of the narratives is to explain the revisions to each line item, or the reason for leaving a line item unchanged, or the reason for adding a line item within the tables.

a. Table 3A – Narrative Explanations

[A] – SmartMeter Upgrade Deployment Costs: Most of the line items (unless specifically identified in [B] and [C] below) in Table 3 relate to SMU program deployment costs which occurred from 2008 to 2013. All of those line items were already updated to reflect actual

costs incurred in the 2023 Update and therefore have not changed in this 2027 Update. See Exhibit (PG&E-6), WP 7A-1 to 7A-2.

[B] – Meter Devices (Less HAN and Electromechanical Meter Upgrades) and Operations and Maintenance: There are two line items in Table 3 which in addition to the completed project costs, include forecasted costs over the full 20-year life of the program. Meter Devices includes the incremental cost of providing a new SmartMeter for all new customers over the life of the project, and Operations and Maintenance includes the costs of replacing failed meters during that period. Both line items are driven by the number of SmartMeters currently and forecasted to be deployed in the field.

As part of this 2027 Update, the previous forecast of SmartMeters from 2021 to 2024 was updated with actual SmartMeter deployment counts for those years. In addition, the forecast of new customers requiring a SmartMeter from 2025 and beyond was updated based on the latest forecast of growth assumptions in PG&E's territory. These updated SmartMeter volumes are slightly lower than the previous forecast, and as a result, the related costs are also slightly lower than the 2023 Update. (See Exhibit (PG&E-6), WP 7A-20 and the resulting impacts to Exhibit (PG&E-6), WPs 7A-1 to 7A-8.)

[C] – Time-of-Use (TOU) Program Costs: The other line item in Table 3 that includes costs over the 20-year life of the SMU Program relates to TOU Program Costs. Costs for this line item have been updated as follows:

- Previously reported and forecasted costs for 2017-2022 have been updated to reflect actual costs incurred, as reported in the final PG&E Quarterly Report of Progress of Residential Rate Reform filed in November 2022.
- For years beyond 2022, PG&E assumed $3 per customer per year for outreach (consistent with the 2023 Update) to an estimated 3.1 million TOU customers in 2023, and then adjusted for growth in new customers through the end of the program as

described above. (See Exhibit (PG&E-6), WPs 7A-1 to 7A-2, 7A-18.)

b. Table 4A – Narrative Explanations

[D] – Integrated Connect/Disconnect Switches: In addition to updating the projected number of SmartMeters with Remote Connect/Disconnect capabilities deployed in the field based on updated customer growth rates, there were several other developments that have significantly impacted the policies for implementing Shut-Offs for Non-Payments, and therefore the usage of the Remote Connect/Disconnect capability.

Table 7A-6 summarizes the resolutions and decisions impacting the usage of Integrated Connect/Disconnect Switches:

TABLE 7A-6
REGULATORY HISTORY

Line No.	Date	Reference	Description
1	11/2017	Resolution (Res.) M-4833	Resolution suspended disconnections for non-payment related to the October 2017 California Wildfires.
2	1/2018	Res.M-4835	Resolution suspended disconnections for non-payment related to the December 2017 California Wildfires.
3	5/2019	D.19-05-037	Decision in PG&E's 2019 Wildfire Mitigation Plan Pursuant to Senate Bill (SB) 901 suspended disconnections for non-payment in areas impacted by wildfires.
4	4/2020 2/2021	Res.M-4842 Res.M-4849	Emergency Authorization and Order Directing Utilities to Implement Emergency Customer Protections to Support California Customers During the COVID-19 Pandemic, which implemented a moratorium on all service disconnections for non-payment throughout PG&E's service territory due to the statewide health emergency. Res.M-4849 extended the moratorium related to the COVID-19 Pandemic through June 30, 2021. This was further extended by the Commission through September 30, 2021.
5	6/2020	D.20-06-003	In response to the Service Disconnections Order Instituting Rulemaking 2018 (Rulemaking 18-07-005) and SB 598, this decision requires a more comprehensive plan to reduce the statewide disconnection rates of residential gas and electric utility customers. In addition to impacting the historical counts of residential electric disconnections for non-payment, this decision sets targets of a maximum of 4 percent disconnections in 2021 and 2022, and then a further reduction to 3.5 percent for residential customers beginning in 2023 and thereafter.

In this update, the previous forecast in the 2023 GRC Update for remote connect and disconnect usage for 2021 through 2024 was replaced with actual usage during that period. Actual usage was lower than the previous forecast, as the impacts of the above resolutions and decisions extended for a longer period of time than was forecasted at the time. The CPUC extended the moratorium on shut-offs for non-payment through September 30, 2021, and PG&E did not reinstate the process until 2022 when PG&E could validate the processes were complete, verify that systems were still working

as planned, and staff could be re-trained. In addition, the forecast was adjusted to reflect the elimination of reconnection fees for residential customers.

The capability to perform remote connects and disconnects continues to exist as planned, but policy directives may continue to limit the usage of that capability, resulting in a decrease in the achieved and forecasted benefits of this capability.

[E] – Tax Benefit from Meter Replacement: This benefit is related to the deployment of the SmartMeter Program, which was completed in 2013. As a result, there is no change to the value of this benefit as calculated and presented in the 2017 Update. (See Exhibit (PG&E-6), WP 7A-21.)

[F] – Projected Additional Tax Benefits: In the 2023 Update, PG&E had identified incremental tax benefits associated with shortened depreciation lives of SmartMeter assets, above those already reflected in Table 3. At that time, the additional incremental benefits of shorter tax lives for SmartMeter assets was forecasted to be approximately $22.6 million. Since the Projected Additional Tax Benefits are partially driven by the forecast of new meters to be deployed for customer growth, the benefit has been updated slightly, based on the updated forecast of customer growth. (See Exhibit (PG&E-6), WP 7A-9 to 7A-10).

[G] – Electric Conservation: In the original SMU application, PG&E included benefits associated with connection of In-Home Display devices developed by third-party vendors to PG&E's HAN. As described in the 2023 Update, that market has not developed as anticipated, and while PG&E sustains HAN capability for the benefit of the installed user base, customer devices connected to the PG&E HAN remain minimal. Therefore, for purposes of this cost effectiveness update, PG&E continues to exclude this benefit.

[H] – Gas Conservation: This line item is unchanged. It was not adopted in D.09-03-026.

[I] – Peak-Time Rebate (PTR): This line item is unchanged, and the benefits associated with PTR continue to be excluded from this analysis.

[J] – Time-of-Use (TOU): In place of PTR, PG&E added estimates for the benefits of TOU programs in the 2023 Update. PG&E has updated the avoided cost of capacity megawatt estimates, and the energy conservation gigawatt-hour estimates based on actual results of the TOU programs in terms of customer participation and response. In addition, PG&E has updated the market-based power pricing assumptions based on the most recent E3 Avoided Cost Calculator (ACC). The Power Price Forecast in the 2024 ACC has increased since the 2023 Update, resulting in a slight increase in the energy conservation benefits associated with TOU. (See Exhibit (PG&E-6), WP 7A-22.)

[K] – A/C Cycling: As described in the 2023 Update, it is still unclear at this time if or when Programmable Communicating Thermostats (PCT) will be required by residential building codes. Therefore, PG&E continues to exclude the benefits associated with supporting a PCT direct load control program from this SMU cost effectiveness analysis.

C. Additional Unquantified Benefits

As discussed originally in PG&E's December 1, 2015 report[4] and in the subsequent Updates, there are other potential incremental future potential benefits from SMU technology, primarily related to Electric Program Investment Charge and Smart Grid programs and other pilots, which are not reflected in the tables or the narrative explanations above.[5]

---

[4] D.15-07-008, pp. 34-35, OP 5, updated analysis of the cost-effectiveness of its SmartMeter Update.

[5] For example, among others, PG&E discussed potential benefits associated with Volt/VAR Optimization (VVO) in the December 1, 2015 report, (A.15-09-001, Exhibit (PG&E-16). Since the time that report was filed, PG&E filed Advice Letter (AL) 4990-E, which estimated a range of net benefits for VVO of $92 million to $295 million on a total resource cost basis. While SMU potentially supports and enhances a portion of VVO benefits, the report filed in AL 4990-E does not identify what portion that may be. For that reason, PG&E has not included these costs and benefits in Tables 3 and 4.

One example of a program with unquantified benefits of SmartMeter technology which was identified in the 2023 Update and is in place and providing benefits today relates to hot socket detection. Hot sockets can occur when socket jaws at the meter panel have deteriorated or been compromised such that arcing is taking place, causing high temperature conditions and a potential safety hazard at the meter socket. Using temperature and load data collected from SmartMeters on a daily basis, PG&E is able to identify and replace faulty meter sockets before a catastrophic failure occurs. From January 2019 through March 2021, this process successfully detected and remediated 306 hot sockets, preventing 306 safety hazards to PG&E customers and the general public.

Another example of the use of SmartMeter data to identify potential safety hazards that was identified in the 2023 Update relates to the Partial Voltage Detection program (formerly known as Enhanced Wires Down Detection). Partial voltage conditions can indicate the loss of phase/conductor and downed power lines on the distribution circuit. Real-time alerts allow Control Center Operations to dispatch field personnel to locations where equipment may be in a condition that increases wildfire risk. This enhanced situational awareness can help detect and locate downed distribution lines more quickly, enable faster response to reduce the amount of time that a line is down, and allow first responders to more quickly extinguish wire down-related ignitions, if they occur. In 2024, this technology was used to de-energize power lines 31 times where partial voltage data indicated a potential wire-down condition.

A new example identified since the 2023 Update of the use of the SmartMeter platform to improve safety relates to the Transformer Predictive Maintenance Model, also known as Project IONA. Project IONA (part of Epic 3.20) is a technology demonstration project focused on identifying high-probability-of-failure transformers through machine learning, utilizing data provided by SmartMeters. By identifying and either removing or remediating high-risk assets before they fail, this program is a key component of PG&E's mitigation plan to reduce the risk of wildfire or other catastrophic events. Based on desktop engineering reviews of over 500 cases since implementation, 68 percent resulted in the confirmation of transformer anomalies, enabling

approximately 5-7 successful interventions per week by PG&E technicians of transformers with a high likelihood of failure.

PG&E has not attempted to quantify the dollar benefit of using SmartMeter data to identify meter socket safety hazards, downed power line situations, high-probability-of-failure transformers, or other safety improvements due to the difficulty and subjectivity of doing so. However, these programs are critical components of PG&E's ongoing commitment to wildfire prevention and safety improvements. These programs would not be possible without the solid state electric meters deployed as part of the SMU Program and the data they provide. PG&E believes these existing benefits, and similar future potential benefits are an important aspect of evaluating the cost effectiveness of the SMU technology.

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 8

GAS AMI PROGRAM

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 8
GAS AMI PROGRAM

TABLE OF CONTENTS

A. Introduction 8-1
1. Scope and Purpose 8-1
2. Summary of Request 8-3
a. Expense 8-3
b. Capital 8-4
c. Nature of Costs 8-5
B. Program Overview 8-6
C. Program Description 8-9
1. Gas Module Required Maintenance 8-10
2. Gas Module Lifecycle Replacement 8-11
3. Gas AMI System Upgrades 8-12
4. Centralized PMO and Customer Communications 8-15
D. Support for Gas AMI Program 8-16
1. Gas Module End-of-Life Projections 8-16
2. Technology Obsolescence and Market Risk Mitigation 8-17
3. PG&E's Technology Roadmap and Industry Trends 8-19
4. Program Does Not Conflict With Electrification Goals 8-19
5. Gas Module Warranty and Supplier Quality Assurance 8-20
6. Program Is Cost-Effective vs. Status Quo 8-21
E. Cost Forecasts by Major Work Category With Estimating Methodologies 8-23
1. Expense Forecast by MWC With Estimating Methodologies 8-23
a. Program Management (MWC EZ) 8-24
b. Call Center Operations (MWC DK) 8-24
c. Billing Operations (MWC IS) 8-24

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 8
GAS AMI PROGRAM

TABLE OF CONTENTS
(CONTINUED)

d. Maintain IT Applications and Infrastructure O&M (MWC JV) 8-25

2. Capital Expenditure Forecast by MWC With Estimating Methodologies 8-25

a. Build IT Applications and Infrastructure (MWC 2F) 8-25

b. Install Gas AMI Modules and Infrastructure (MWC 74) 8-26

F. Compliance with Prior Commission Decisions 8-26

G. Conclusion 8-27

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 8
GAS AMI PROGRAM

A. Introduction

1. Scope and Purpose

Pacific Gas and Electric Company (PG&E or the Company) respectfully submits, and requests approval from the California Public Utilities Commission (CPUC or the Commission) to recover 2027-2030 forecasted costs to maintain, upgrade and replace (as necessary) the Company's legacy Gas Advanced Metering Infrastructure (Gas AMI 1.0 or Gas SmartMeter™)[1] as it reaches its expected useful lifespan.[2] As further described in this chapter, this work is collectively termed the "Gas AMI Program." The program includes the replacement of approximately 1.3 million remaining legacy battery-operated gas modules[3] and the necessary upgrades or replacement of certain components of PG&E's Gas AMI system to mitigate technology obsolescence and other market risks.[4]

---

1 Gas AMI 1.0 is PG&E's original and current one-way communication system installed from 2006 through 2013 that securely and automatically transmits customer gas energy usage to the Company's billing system. See WP 8-18 to WP 8-20 "Glossary of Key Terms" for a definition of "Gas AMI 1.0" and other key terms used in this chapter.

2 In Decision D.06-07-027, the Commission established a 20-year useful life for Gas AMI 1.0 and approved revising the useful life to 15-years in PG&E's 2023 GRC. Reference PG&E's A.21-06-021, Exhibit (PG&E-10), WP 12-1227 to WP 12-1228 (Depreciation Study), WP 11-5, line 238 and WP 11-6, line 282; D.23-11-069, p. 675, fn. 2452.

3 PG&E's gas modules are battery-operated hardware devices with built-in network interface cards (NICs). These modules are externally attached to each customer gas meter, enabling AMI functionality, and delivering customer gas usage data via the Gas AMI network to PG&E's billing system. PG&E's Gas AMI Program mostly will replace the remaining first-generation Series 500 gas modules (originally deployed between 2006 to 2013) and a smaller volume of second-generation Series 3000 gas modules (installed starting in 2015 through maintenance as legacy modules were discontinued by the supplier). As of December 2024, there were approximately 2.1 million remaining legacy gas modules in service. PG&E forecasts approximately 1.3 million remaining legacy modules as of January 2027 to be replaced by the end of 2030. Reference WP 8-9, "Current Gas Modules In-Service by Vintages."

4 Gas AMI technology obsolescence and market risk mitigation is discussed in further detail in Section D.2 of this chapter.

In March 2024, PG&E submitted Application A.24-03-011 requesting recovery of costs from 2023 through 2026 related to the replacement of approximately 1.7 million legacy gas modules[5] and the maintenance, upgrade or replacement of certain components of PG&E's Gas AMI system where appropriate (collectively termed "the Comprehensive Gas AMI Replacement Program").[6] In A.24-03-011, PG&E stated that the remaining costs to complete activities in this program after 2026 would be included in the Company's 2027 GRC. Accordingly, PG&E's Gas AMI Program will continue this necessary work through the GRC period (2027 through 2030), including the replacement of the Company's remaining approximately 1.3 million legacy gas modules with next-generation modules and the completion of the remaining requisite upgrades to its Gas AMI system to enable greater Gas AMI functionality.

PG&E has prudently maintained its legacy Gas AMI 1.0 system since its initial deployment began in 2006. In recent years, PG&E has focused on maintaining the system's core functionality while enabling enhanced AMI capabilities and mitigating expected technology obsolescence and discontinued vendor support of legacy systems. Newly available advanced technologies will enable PG&E to lower customer costs through operational efficiencies as well as to improve customer service, enhance public safety, and advance environmental benefits. PG&E's Gas AMI Program will improve its Gas AMI system incrementally and cost effectively without a wholesale system replacement. This incremental approach to system improvements ensures that PG&E can continue to provide timely and accurate gas billing and consumption data to its customers. This data is

---

5 Since filing Application (A.)24-03-011, PG&E's updated forecast of legacy module replacements for the 2023-2026 period is 1.6 million units. As of March 2025, the application is pending a Commission decision.

6 The recovery request in PG&E's A.24-03-011, p. 2 includes $496 million of forecasted costs from 2023 through 2026 ($485 million in capital expenditures and $11 million in expenses). In October 2024, the Commission issued a Scoping Memo with a procedural schedule indicating a potential final decision in 2025. In November 2024, Commission's D.24-11-010 approved PG&E establishing a Gas AMI Memo Account (GAMIMA) to track all program costs starting on March 14, 2024, in alignment with filing date of the Application. This was followed by Commission-approved Advice Letter (AL) 5007-G/7446-E dated January 2025. As of March 2025, this application is pending a Commission decision.

critical to helping customers manage and reduce their gas usage and monthly energy bills, including through energy efficiency programs. In addition to these foundational customer benefits, these incremental improvements to PG&E's Gas AMI system will provide customers with enhanced benefits that these new, advanced technologies can provide.

This chapter describes activities necessary for PG&E to maintain its Gas AMI 1.0 system while completing necessary upgrades enabling the Company to leverage advanced AMI capabilities to benefit its customers. As demonstrated in this chapter, PG&E's Gas AMI Program and its associated expense and capital forecasts for 2027-2030 are reasonable and should be approved by the Commission.

2. Summary of Request

Capital and expense costs associated with PG&E's Gas AMI Program (2027-2030) are included in this chapter and further described below.[7]

a. Expense

PG&E requests that the Commission adopt its 2027 expense forecast of $2.0 million. The total expense forecast of $10.7 million from 2027 through 2030 for project costs associated with program management activities are necessary to ensure completion of the Gas AMI Program by 2030. Although PG&E furnishes the total expense forecast for this program during this GRC period, only the 2027 test year expense forecast is included in the Company's Results of Operations (RO) model.[8]

Figure 8-1 below shows expense costs and forecast by Major Work Categories (MWCs) from 2023 through 2030. The expenses in 2023 and 2024 are recorded costs and the expenses in 2025 and 2026 are forecasted costs. These expenses include establishing and

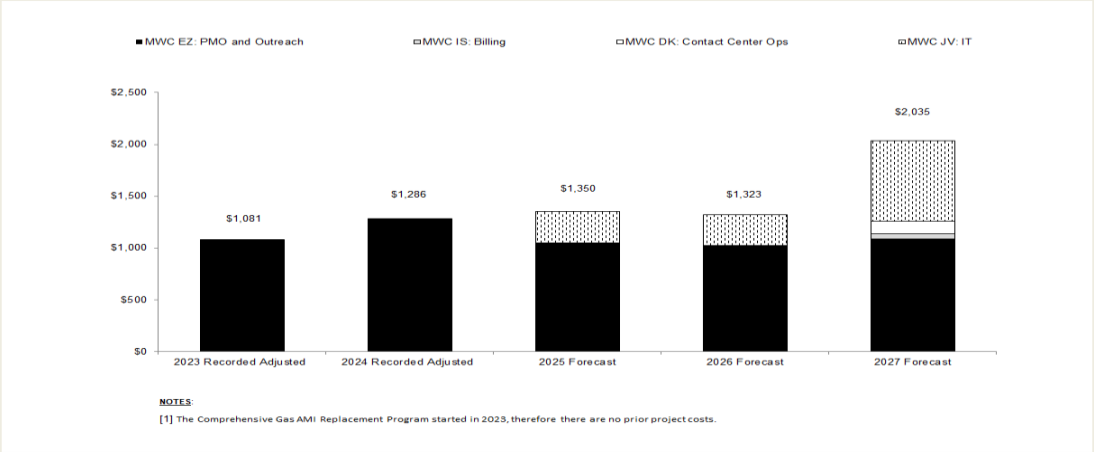
---

[7] Cost recovery associated with the Gas AMI maintenance, upgrade, and replacement work from 2023 through 2026 is included in PG&E's A.24-03-011. As of March 2025, this application is pending a Commission decision. While A.24-03-011 (2023-2026 forecasted costs) and this current GRC (2027-2030 forecasted costs) address the necessary maintenance, upgrades, and replacement of its legacy Gas AMI System through 2030, the Company anticipates on-going maintenance related costs to be included in future GRCs.

[8] Reference PG&E's GRC 2027, Exhibit (PG&E-10), Ch. 4, O&M Expense.

maintaining a project management office (PMO) necessary to effectively manage a program of this size and complexity. Expenses also include forecasted costs needed to conduct comprehensive customer outreach and provide incremental contact center and billing support. As of March 2025, a cost recovery decision on 2023-2026 expenses is pending by the Commission (A.24-03-011). The remaining forecasted expenses from 2027 through 2030 are requested in this GRC.[9]

FIGURE 8-1
EXPENSES BY MWC (2023-2027)
THOUSANDS OF NOMINAL DOLLARS



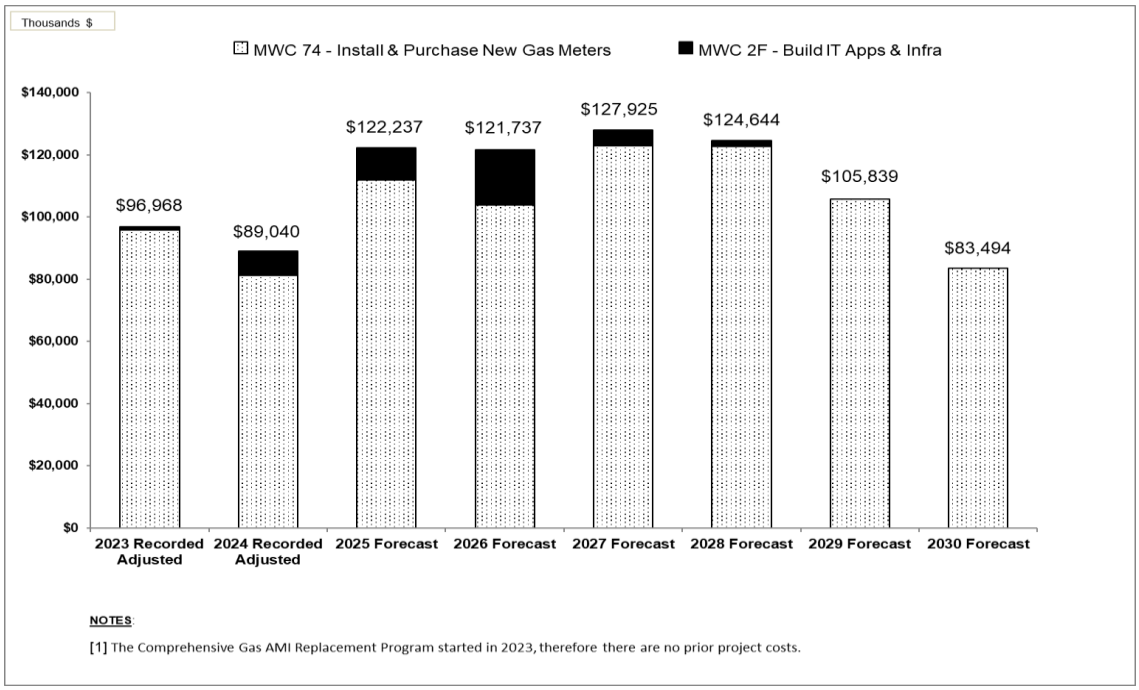
b. Capital

PG&E requests that the Commission adopt its 2027-2030 total capital expenditure forecast of $442 million associated with program labor and materials as described in more detail in Section B of this chapter. Figure 8-2 below shows the capital expenditures costs and forecast by Major Work Categories (MWCs) from 2023 through 2030. The capital costs for 2023 and 2024 are recorded costs and the capital costs for 2025 and 2026 are forecasted costs. As of March 2025, a cost recovery decision on 2023-2026 expenditures is pending by the

[9] Reference WP 8-1, "Recorded Adjusted and Forecast Expenses by Major Work Category (Nominal Dollars)"; WP 8-2, "Recorded Adjusted and Forecast Expenses by Major Work Category (Base Dollars)"; WP 8-10, "Summary of Expense Forecast by Major Work Category"; and WP 8-11 to WP 8-12, "Detail Expense Forecast by Major Work Category."

Commission (A.24-03-011). The remaining forecasted capital expenditures from 2027 through 2030 to implement and complete this program are requested in this GRC.[10]

FIGURE 8-2
CAPITAL EXPENDITURES BY MWC (2023-2030)
THOUSANDS OF NOMINAL DOLLARS



c. Nature of Costs

To avoid double counting, PG&E treats gas meters and gas modules as separate assets with a clear funding delineation between different programs based on the asset and the nature of the work. PG&E's Gas AMI Program includes incremental costs associated with replacing its gas modules, along with the maintenance, upgrade, and replacement of its legacy Gas AMI system. Routine gas meter maintenance costs are not included in this program.[11] PG&E's

---

[10] Reference WP 8-4, "Capital Expenditures by Major Work Category (Nominal Dollars)"; WP 8-5, "Forecast Capital Expenditures Summary (Nominal Dollars)"; WP 8-13, "Summary of Capital Expenditure Forecast by Major Work Category"; and WP 8-14 to WP 8-16, "Detail Capital Expenditure Forecast by Major Work Category."

[11] Reference PG&E Exhibit (PG&E-6), Ch. 7, "Meter Services & Engineering" relating to routine Gas Meter Maintenance which includes gas meter installations and exchanges.

standard practice is to replace a failed gas module with a new module while leaving the existing gas meter intact at the customer's premise. However, in limited circumstances where the underlying reason for the work is caused by a gas module failure, PG&E's gas meter/module combination exchanges are included in its Gas AMI Program.[12]

B. Program Overview

PG&E's existing Gas AMI 1.0 system is a one-way communication system installed between 2006 to 2013 that securely and automatically transmits customer gas usage to the Company's billing system. The Gas AMI system includes application software, network communication equipment and battery-operated gas modules with built-in network interface cards (NICs)[13] externally attached to each customer gas meter, which all connect to PG&E's billing system. PG&E's Gas AMI system is necessary to ensure uninterrupted automated gas usage collection,[14] which supports critical utility functions such as customer billing and energy efficiency programs.[15] In addition, PG&E relies on Gas AMI data to support a safe and reliable gas system for its customers.

---

[12] PG&E replaces the vast majority of gas modules by removing the old gas module from the gas meter and installing a new gas module onto the existing gas meter at the customer's premise. The limited circumstances where an entire gas meter and module set needs to be replaced include when meters have broken indexes or screws, meters are corroded, or for other site-specific reasons.

[13] Network interface card (NIC) is a hardware component integrated into the gas module that allows the module to communicate customer gas usage to PG&E's network and back to its head-end application.

[14] PG&E is not the only provider that relies on gas usage data to provide accurate and timely bills to customers. As of March 2025, PG&E coordinates with 29 third-party core transport agents (CTAs) who provide gas to customers through PG&E's existing gas infrastructure. PG&E's Gas AMI provides the daily gas usage data to enable CTAs to effectively run their business. A list of the CTA partners can be found at: https://www.pge.com/en/account/alternate-energy-providers/core-gas-aggregation.html (accessed April 21, 2025).

[15] Gas AMI provides PG&E customers with their gas consumption data to help them conserve energy and manage their energy bills. As of March 2025, this gas usage data has been crucial to the provision of energy savings to approximately 3.0 million customers enrolled in 22 energy efficiency gas programs. These gas energy efficiency programs rendered customer savings totaling approximately 31 million therms in 2024. Reference WP 8-17, "Gas Energy Efficiency Programs" for more information.

For example, PG&E uses Gas AMI data to monitor gas system pressure for potential outages and implement curtailment procedures when necessary.[16]

When the Commission approved PG&E's Gas AMI Application in 2006, it adopted a 20-year useful life for the Gas AMI system based on then-available data. However, the Commission recognized that this was new technology, and acknowledged that, "individual components may fail early or last longer than the overall useful life."[17] In addition, the Commission adopted a 20-year depreciable life for the new AMI system to "match" the adopted useful life, but acknowledged that the depreciable life should be re-examined in the future "when there is credible evidence that the life should be adjusted."[18] In PG&E's 2023 GRC, the Commission adjusted the depreciable life for Gas AMI assets (including gas modules and Gas AMI communication equipment) to 15 years based on PG&E's then-current depreciation study.[19]

Most of PG&E's legacy Gas AMI assets have reached their 15-year depreciable life and must be replaced. PG&E's Gas AMI Program proposes an efficient, comprehensive and programmatic approach to replace gas modules from 2027 through 2030, including continuing to prioritize the replacement of modules as they fail (referred to as Required Maintenance), supplemented by the replacement of modules in select areas that are experiencing higher rates of failure (referred to as Lifecycle Replacement).[20]

Deployed primarily from 2006 to 2010 (ahead of field deployment of SmartMeter™ gas modules), PG&E's gas head-end system and network only has one-way communication functionality and is nearing its end-of-life. PG&E's Gas AMI Program includes the necessary funding to upgrade or replace technology reaching obsolescence with currently available next-generation

---

16 PG&E also uses Gas AMI data to generate customer load projections for gas hydraulic models, develop customer usage profiles and load estimation for gas system clearances and operation support, and conduct feasibility analyses for potential large load and renewable natural gas customers.

17 D.06-07-027, p. 24.

18 D.06-07-027, p. 26.

19 D.23-11-069, p. 675, fn. 2452; A.21-06-021, Exhibit (PG&E-10), WP 12-1227 to WP 12-1228 (Depreciation Study).

20 Reference WP 8-18 to WP 8-20, Glossary of Key Terms for a definition of "Required Maintenance," "Lifecycle Replacement," and other key terms used in this chapter.

Gas AMI technologies with two-way communications.[21] While the second-generation gas modules (Series 3000 model) that PG&E has installed since 2015 have two-way communication functionality, PG&E has not been able to leverage their advanced capabilities, as the original head-end system and network do not support two-way communication.[22]

Enabling PG&E's Gas AMI system with two-way capabilities will allow the Company to implement enhanced features of new technologies that require two-way communication, including automatic and remote shutoff for improved safety, on-demand meter reads, over-the-air updates, and measurement of hydrogen blending in the gas system. As the Commission stated in its decision approving PG&E's SmartMeter™ deployment, it expects "…PG&E to monitor market place developments so, whenever feasible, it can upgrade its AMI system and offer its customers technology upgrades."[23]

Since its initial SmartMeter™ deployment, PG&E has diligently monitored available and upcoming AMI technologies. In recent years, major utilities across North America have begun piloting or deploying newly available enhanced Gas AMI technologies.[24] These technologies include gas ultrasonic meters

---

21 PG&E began Gas AMI system upgrades during the 2023-2026 period with remaining work activities to complete these upgrades contained in this GRC forecast (2027-2030) including approximately $7 million in capital expenditures for IT and head-end systems costs. Reference WP 8-21, "Gas AMI System Upgrade."

22 Aclara discontinued manufacturing first-generation legacy modules (Series 500 model) in 2015. Since then, PG&E has purchased and installed second-generation modules (Series 3000 model).

23 D.06-07-027, p. 59.

24 Major North American utilities deploying or piloting next-generation Gas AMI and metering technologies include, but are not limited to, CenterPoint Energy, FortisBC Energy and Spire Energy.

(USMs)[25] and methane detectors[26] that are expected to provide significant safety, environmental, operational benefits to customers. PG&E's Gas AMI Program will enable two-way communications required for these enhanced technologies to function. The capabilities enabled by implementation of next-generation Gas AMI will significantly benefit customers and complement California safety and environmental goals.

C. Program Description

Key activities of PG&E's Gas AMI Program include: (1) Required Maintenance of gas modules; (2) Lifecycle Replacement of gas modules; (3) Gas AMI system upgrades; and 4) Project management office (PMO) operations and customer communications. These key activities are further described below. Table 8-1 below summarizes all program costs by work activity.

TABLE 8-1
SUMMARY OF ALL PROGRAM COSTS BY WORK ACTIVITY (2027-2030)

Line No.	Required Maintenance (RM)	Lifecycle Replacement (LR)	System Upgrades
1	Replacement of gas modules as they fail system-wide	Targeted replacement of gas modules in select geographies	Required system upgrades to transition from Gas AMI 1.0 to Gas AMI 2.0
2	1,049,258 gas modules	340,000 gas modules	N/A
3	$351.1 million in capital $2.9 million in expense	$78.6 million in capital $2.2 million in expense	$12.2 million in capital $5.6 million in expense

[25] Gas USMs use sound waves to determine the velocity of gas flowing through a pipe, unlike the mechanical diaphragm meters widely used today. USMs do not have mechanical components and are equipped with monitoring sensors for gas flow, pressure, temperature, and seismic events, and allow for autonomous and remote shutoff capabilities. Vendors state certain USM models are able to accurately measure hydrogen in the gas distribution system mix. See WP 8-18 to WP 8-20 "Glossary of Key Terms" for a definition of "gas ultrasonic meters" and other key terms used in this chapter.

[26] Residential methane detectors (RMDs) are battery operated hardware devices that provide alerts of leaking natural gas inside a home, basement, or meter room. RMDs measure the concentration of methane in the air and sound an alarm before flammable levels are reached. See WP 8-18 to WP 8-20, "Glossary of Key Terms" for a definition of "residential methane detectors" and other key terms used in this chapter.

1. Gas Module Required Maintenance

Following completion of its initial Gas AMI deployment in 2013, PG&E implemented a standard process of replacing gas modules as they fail (Required Maintenance). When modules fail, PG&E is unable to access customer gas usage data to enable billing until the module is replaced with a new one. PG&E prioritizes Required Maintenance work to ensure that customers continue to receive timely and accurate billing and gas usage information.

Table 8-2 below summarizes forecasted annual gas module replacements through Required Maintenance from 2027 through 2030 totaling approximately 1,049,258 modules with an average of 262,314 modules per year, essentially replacing all remaining legacy modules.[27]

TABLE 8-2
REQUIRED MAINTENANCE GAS MODULE REPLACEMENTS (2027-2030)

Line No.	Gas Module Type[(a)]	2027 Forecast	2028 Forecast	2029 Forecast	2030 Forecast	2027-2030 Total Forecast
1	Legacy Series 500 Modules	273,325	269,732	212,316	111,212	866,585
2	Second-Generation Series 3000 Modules	26,637	36,017	49,840	70,179	182,673
3	Total Modules	299,962	305,749	262,156	181,391	1,049,258

(a) Legacy modules (Series 500 model) constitute the vast majority of modules requiring replacement in PG&E's service area. PG&E currently replaces these legacy modules with second-generation gas modules (Series 3000 model). However, there is a smaller volume of Series 3000 modules also forecasted for replacement during this GRC period as installation of this product line began in 2015 as the supplier discontinued manufacturing of legacy modules.

Table 8-3 below provides a summary of forecasted capital expenditures associated with Required Maintenance which primarily include material and labor costs.

27 Reference WP 8-22 to WP 8-27, "Gas Module Maintenance Program" for historical and forecast gas module replacement volumes.

TABLE 8-3
SUMMARY OF REQUIRED MAINTENANCE FORECAST (2027–2030)
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	Required Maintenance	2027 Forecast	2028 Forecast	2029 Forecast	2030 Forecast	2027-2030 Total Forecast
1	Capital Expenditures	$99,692	$102,604	$85,905	$62,938	$351,139
2	Expense	$737	$822	$673	$682	$2,914

2. Gas Module Lifecycle Replacement

Starting in 2023, PG&E implemented Lifecycle Replacement of gas modules to supplement its standard Required Maintenance replacement of modules. As further described in this section, Lifecycle Replacement provides customers with additional benefits by replacing modules prior to failure based on module end-of-life projections.[28]

PG&E's Lifecycle Replacement strategy efficiently replaces gas modules forecasted to reach end-of-life on a proactive and programmatic basis. From 2023 through 2026, PG&E implemented a Lifecycle Replacement strategy based on its updated module end-of-life forecast analysis. Using this analysis, PG&E prioritized module replacements mainly in its Sacramento and Kern divisions where its gas modules were the oldest, and the failure rates were the highest. PG&E's data results during this period for this work demonstrate better customer experiences and reduced operational costs. By replacing gas modules proactively prior to failure, PG&E is able to schedule appointments with customers in advance, resulting in increased customer satisfaction. Further cost savings are realized as field technicians can plan their routes more efficiently in advance and by geographic regions, down to the street level, reducing drive times between module replacements.[29]

PG&E will continue to conduct select Lifecycle Replacement work as a supplement to Required Maintenance work during the 2027-2030 GRC period. Table 8-4 below provides a summary of PG&E's forecasted capital

---

28 Gas modules reach end-of-life when their batteries run out of energy and require replacement with a new gas module.

29 Reference WP 8-22 to WP 8-27, "Gas Module Maintenance Program" for further information relating to PG&E's Lifecycle Replacement work including key metrics based on work results from 2023 to 2024.

expenditures and expenses associated with Lifecycle Replacement from 2027 through 2030.

TABLE 8-4
SUMMARY OF LIFECYCLE REPLACEMENT FORECAST (2027-2030)
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	Lifecycle Replacement	2027 Forecast	2028 Forecast	2029 Forecast	2030 Forecast	2027-2030 Total
1	Capital Expenditures	$18,749	$19,331	$19,934	$20,556	$78,570
2	Expense	$520	$548	$563	$579	$2,210
3	Number of Gas Modules	85,000	85,000	85,000	85,000	340,000

3. Gas AMI System Upgrades

PG&E's original one-way communication Gas AMI system (Gas AMI 1.0) installed from 2006 through 2013 provides foundational capabilities by securely and automatically transmitting customer gas usage to the Company's billing system, providing timely and accurate billing to over 4 million PG&E gas customers. The system includes head-end application software,[30] network communication equipment, and battery-operated gas modules with built-in network interface cards externally attached to each customer gas meter, which all connect to the PG&E's billing system.

This legacy Gas AMI system is reaching the end of its expected lifespan. PG&E has an obligation to its customers to mitigate expected obsolescence and discontinued vendor support of this system, as well as continually evaluate the efficacy of new Gas AMI technologies. As such, PG&E seeks funding to complete the necessary upgrades of its Gas AMI

[30] Gas head-end application is a software application with a user interface that provides administrative tools allowing for command and control of Gas AMI devices. See WP 8-18 to WP 8-20, "Glossary of Key Terms" for a definition of "gas head-end application" and other key terms used in this chapter.

system to provide next-generation Gas AMI 2.0[31] functionality that will provide significant benefits to its customers.[32]

As forecasted in this 2027-2030 GRC, PG&E's Gas AMI Program will complete the implementation of Gas AMI system upgrades including enabling gas functionality on its Itron-based Electric AMI platform. By doing so, PG&E can leverage its existing Electric AMI system to deploy Itron gas endpoints, including ultrasonic meters (USMs). The program also includes the deployment of Aclara's next-generation AMI software and network hardware to enable the capabilities of USMs and next-generation gas modules requiring two-way communication functionality.[33] PG&E's Gas AMI Program will allow the Company to unlock Gas AMI 2.0 benefits while mitigating risks associated with technology obsolescence.

Since the deployment of its legacy Gas AMI 1.0 system, PG&E has continued to monitor and evaluate new AMI technologies that may benefit its customers. Based on this due diligence, PG&E continues to evaluate Gas AMI 2.0 technologies that will mitigate the risks associated with the expected obsolescence of its original Gas AMI 1.0 system and enable next-generation Gas AMI 2.0 functionality that provide significant benefits to its customers.

PG&E has benchmarked the testing and implementation of AMI technologies by other gas utilities. In 2023, the Company also completed a Gas AMI 2.0 Request for Proposal (RFP) with five major vendors in which PG&E selected Gas AMI product solutions provided by its current Gas AMI vendor Aclara and its current Electric AMI vendor Itron. PG&E plans to complete upgrades to implement Aclara's next-generation two-way Gas AMI

---

31 Gas AMI 2.0 represents the next generation of gas smart metering technologies featuring two-way communication with enhanced capabilities for data accuracy, leak detection, cybersecurity, and safety like autonomous and remote shutoff functionality. See WP 8-18 to WP 8-20, "Glossary of Key Terms" for a definition of "Gas AMI 2.0" and other key terms used in this chapter.

32 PG&E's Gas AMI system upgrades began in 2023 pursuant to A.24-03-011 filed in March 2024 (pending CPUC decision as of March 2025). The application forecast includes implementation of head-end application software and network equipment that enables two-way communication functionality.

33 The deployment of gas USMs and associated costs are not included in this chapter and are included in Metering Services and Engineering, Exhibit (PG&E-6) Ch. 7.

2.0 software and network infrastructure. Costs associated with completing these upgrades are included in this GRC forecast.[34]

The capabilities enabled by implementation of next-generation Gas AMI will provide significant safety and environmental benefits to customers. For example, Gas AMI 2.0 technologies allow for deployment of ultrasonic meters (USMs) that provide safety alerts related to high pressure, temperature and flow events and support over-the-air (OTA) remote and automatic shutoff capabilities. USMs also support increased hydrogen blending in the gas system by being able to measure hydrogen levels in the gas system.

Pursuant to its Gas AMI Program, PG&E will complete the necessary AMI system and network upgrades to enable Gas AMI 2.0 and provide benefits as described below.

- **Customer Benefits** include on-demand gas consumption reads providing PG&E and its customers access to real-time gas usage data to help customers manage and reduce their energy bills.
- **Safety and Environmental Benefits** include secure, automatic, and remote shutoff capabilities allowing PG&E to shut-off gas at customer premises for operational or safety reasons. In conjunction with USMs, next-generation Gas AMI 2.0 technologies also can enable methane detection to improve customer safety and measure the mix of hydrogen blend in the gas system to support clean energy goals.
- **Operational Benefits** include secure over-the-air firmware updates to address programming and maintenance needs without requiring field technicians to perform this function at individual gas endpoints.

Table 8-5 below presents a summary of PG&E's Gas AMI Program costs forecasted between 2027-2030. This summary includes: (1) approximately $5.2 million in capital expenditures to complete the replacement of PG&E's Gas AMI network equipment; (2) approximately $7.0 million in capital expenditures to complete the Gas AMI 2.0 system

---

34 PG&E's capital expenditure 2027-2030 forecast to upgrade Aclara's software and network infrastructure is $12.2 million which is 2.8 percent of the total $441.9 million capital expenditure request. Across the 8-year period from 2023 through 2030, the total IT and network capital expenditure forecast of approximately $55.0 million is 6.3 percent of the total capital expenditure forecast of $871.9 million.

upgrade; and (3) approximately $5.6 million of expense that includes incremental staffing required to operate the Gas AMI head-end systems, and annual maintenance fees for licensed software. These activities are further described in Section E below.

TABLE 8-5
SUMMARY OF GAS AMI SYSTEM UPGRADE FORECAST (2027-2030)
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	Gas AMI System Upgrades	2027 Forecast	2028 Forecast	2029 Forecast	2030 Forecast	2027-30 Total
1	Network Communication Equipment Capital (MWC 74)	$4,474	$764	$0	$0	$5,238
2	Build IT Applications and Infrastructure Capital (MWC 2F)	5,010	1,945	0	0	6,955
3	Total Capital	$9,484	$2,709	$0	$0	$12,193
4	Total Expense (MWC JV)	$778	$1,556	$1,600	$1,646	$5,580

4. Centralized PMO and Customer Communications

PG&E's AMI Project Management Office (PMO) has managed its Comprehensive Gas AMI Replacement Program since 2023 and will manage its Gas AMI Program from 2027 through 2030. The PMO will focus on safety, quality, costs, project delivery, and the overall customer experience. PMO responsibilities include but are not limited to: (1) financial management including budget forecasting; (2) industry technology assessments; (3) planning and execution of the technology roadmap; (4) gas module failure rate analysis and lifespan projections; (5) coordinated resource planning and work execution; (6) evaluating project effectiveness and program metrics; (7) customer communications; and (8) supplier and product management including the gas module warranty program.[35]

Customer outreach will continue to be a key focus of the Gas AMI Program. PG&E has developed a plan to communicate with customers and other stakeholders regarding gas module replacements in their

[35] PMO costs include both expense costs and capital expenditures. PG&E allocates 75 percent of the PMO costs to the Required Maintenance Program and 25 percent to the Lifecycle Replacement Program based on the Company's estimate of the relative effort of PMO staff in those programs. This allocation is consistent with the presentation of PMO costs in A.24-03-011 currently pending a Commission decision as of March 2025.

communities. PG&E's multi-touchpoint communications plan creates a positive customer experience and keeps customers informed. PG&E's comprehensive outreach plan also minimizes costs by improving customer appointment scheduling and reducing repeat visits due to access issues. PG&E will continue to provide customers with timely and relevant information about the gas module replacement activities occurring at their premises through various channels and adjust its approach based on real-time customer feedback.[36]

D. Support for Gas AMI Program

1. Gas Module End-of-Life Projections

PG&E deployed the majority of its first-generation legacy gas modules from 2006 to 2013. These modules currently have reached or will be reaching the end of their 15-year useful lifespan.[37] PG&E regularly updates gas module failure rates at a geographic division level[38] and uses this data to develop and implement an efficient and cost-effective plan to schedule gas module replacements. For this 2027 GRC, PG&E updated its gas module failure rate forecast to include module failure data through December 31, 2023.[39] The updated analysis forecasts that, from 2027 through 2030, the average age of a gas module at the time of its replacement is 18.1 years.

The vast majority of the first-generation legacy gas modules currently deployed will reach their 15-year useful life during this GRC period (2027-2030).[40] PG&E's Gas AMI Program focuses on replacing these

---

36 See WP 8-28 to WP 8-30, "Customer Communications Plan."

37 In D.06-07-027, the Commission established a 20-year useful life for Gas AMI 1.0 system and recently approved in PG&E's 2023 GRC to revise the useful life to 15 years. A.21-06-021, Exhibit (PG&E-10), WP 12-1227 to WP 12-1228 (Depreciation Study), WP 11-5, line 238 and WP 11-6, line 282; D.23-11-069, p. 675, fn. 2452.

38 PG&E's customer service area includes five geographic regions (North Coast, North Valley/Sierra, Bay Area, South Bay/Central Coast, and Central Valley). The regions are further subdivided by 19 geographic divisions.

39 Reference WP 8-31, "Gas Module Failure Rate Probability Forecast Methodology."

40 Approximately 99 percent of replacements of first-generation standard range gas modules from 2027-2030 are forecasted to be 15 years or older. Reference WP 8-32 to WP 8-124, "Gas Module Failure Forecast Analysis" for further information relating to gas model vintages average age calculations.

remaining legacy modules by continuing to replace modules as they fail (Required Maintenance), and replacing modules in select geographical areas to capture operational efficiencies, lower project costs, and improve the customer experience (Lifecycle Replacements).

2. Technology Obsolescence and Market Risk Mitigation

a. Technology Obsolescence

PG&E expects that its current gas module supplier will retire its Gas AMI products utilized by the Company in the near future. During the 2027-2030 GRC period, PG&E will mitigate this expected obsolescence and discontinued vendor support by deploying the next-generation of gas modules and supporting AMI technologies. These upgrades will help mitigate potential cybersecurity risks, improve system capacity and latency issues, and provide additional enhanced alerts to enable operations to perform maintenance more quickly.

Technology obsolescence is not limited to aging assets but applies to broader industry trends. PG&E closely monitors these trends and observes a clear move to deploy products with Gas AMI 2.0 functionality as they demonstrate tangible benefits to customers. For example, PG&E observes that manufacturers have begun to decrease production of diaphragm meters (the gas meter standard for over 100 years) in favor of ultrasonic meters (USMs). Of the five major U.S. gas meter manufacturers, only two still manufacture diaphragm meters.[41] The remaining manufacturers are expected to leave the diaphragm meter market in the future increasing lead times and prices for these meters.

Utilities across the U.S., Europe, and Asia Pacific are deploying USMs, which provide safety alerts related to high pressure, temperature and flow events, and support over-the-air and automatic gas meter shutoff capabilities. USMs require two-way communication capabilities to fully enable safety benefits. PG&E's Gas AMI Program will enable two-way communication functionality to leverage the capabilities of USMs and potentially other beneficial technologies.

---

41 Major companies in the U.S. gas meter market include Itron, Landis+Gyr, Sensus, Honeywell, and Aclara. Of those, only Honeywell and Sensus still manufacture diaphragm gas meters.

b. Market Risk Mitigation

PG&E currently operates separate AMI systems to provide gas and electric service to its customers. Aclara is PG&E's current Gas AMI supplier while Itron is PG&E's current Electric AMI supplier. In 2020-2021, PG&E retained an independent third-party consultant to perform a Gas AMI market assessment and recommend feasible and cost-effective solutions relating its Gas AMI system. In 2023, PG&E conducted a comprehensive Request for Proposal (RFP) to evaluate capabilities of leading vendors with next-generation Gas AMI technologies. Through its RFP, PG&E selected its legacy Gas AMI supplier Aclara and its Electric AMI supplier Itron as these vendors best met the Company's requirements with cost-effective solutions for its customers.

PG&E determined that maintaining its existing Aclara Gas AMI system and upgrading that system with its latest software network was the most cost-effective solution. In conjunction, PG&E chose to enable its Itron Electric AMI system for Gas AMI functionality. By enabling Itron as a secondary Gas AMI supplier, PG&E will mitigate supply chain risk, create a competitive vendor environment for pricing, enhance product availability and support, and mitigate costs if PG&E needs to switch vendors or one vendor is no longer able to provide equipment or support. As a major manufacturer of ultrasonic meters (USMs), adding Itron as the second Gas AMI provider will provide PG&E flexibility in the USM market and mitigate sole-source supplier risk.

Along with mitigating single-vendor risk, the selection of Itron will allow PG&E to leverage its existing Electric AMI system by enabling gas functionality on the current Itron AMI software platform. Enabling Itron as PG&E's second Gas AMI supplier will increase network availability and provide a cost-effective alternative solution where Gas AMI 1.0 technology is unable to serve customer locations due to network connectivity issues. Utilizing Itron's Electric AMI system will allow PG&E to deploy Itron's gas modules on existing diaphragm gas meters in hard-to-reach customer gas service locations. Such a solution will result in reduced manual meter reading costs and customer billing exceptions.

3. PG&E's Technology Roadmap and Industry Trends

PG&E has an obligation to its customers to continually evaluate and implement innovative technologies that will provide high value for its customers as they become available. PG&E frequently surveys market participants and evaluates their technology plans, regulatory filings, pilots, and projects to understand technology trends that may better serve its customers.

Based on its benchmarking and its RFP, PG&E developed a technology roadmap to support its goals of providing safe and affordable energy to its customers. PG&E's technology roadmap focuses on its strategy to continue to maintain, upgrade and replace (where appropriate) its existing Gas AMI system. This strategy includes: (1) like-for-like AMI equipment and system replacement where feasible and when in the best interest of customers and (2) AMI equipment and system upgrades to address expected technology obsolescence and discontinued vendor support of legacy equipment, software, and systems.[42]

4. Program Does Not Conflict With Electrification Goals

PG&E's Gas AMI Program and its transition to Gas AMI 2.0 is appropriate and necessary while the long-term planning for California's decarbonization efforts continue. Despite the State's electrification goals, PG&E has an obligation to serve each of its approximately 4.5 million gas customers for as long as they continue to receive gas service.

According to the 2024 California Gas Report (CGR) prepared by the California gas and electric utilities, while PG&E's average-year gas demand is forecasted to decline at a modest annual average rate of 3.0 percent between 2024 and 2040,[43] the number of residential gas customers in PG&E's service area is forecasted to decline only slightly from 2024 to

---

42 Reference WP 8-125 to WP 8-126, "Gas AMI Technology Update" for additional information regarding PG&E's Gas AMI technology assessment and benchmarking.

43 The 2024 CGR presents a comprehensive outlook for natural gas requirements and supplies through 2040. The projections are for long-term planning. California gas and electric utilities jointly prepared the CGR pursuant to D.95-01-039. See foreword of the 2024 CGR on p. 2 and additional information on p. 35 of the report available at: https://www.pge.com/pipeline/en/reference-library/regulatory/cgr.html (accessed April 21, 2025).

2040,[44] and the number of commercial gas customers in PG&E's service area is forecasted to grow on average by 0.1 percent annually during the same period.[45] Therefore, PG&E must plan to support close to 4.5 million gas customers for at least the next 15 years.

PG&E's Gas AMI Program will provide enhanced safety and operational benefits for customers during that time including support for blending hydrogen into the gas system, an important part of California's energy strategy.[46] As long as there is a need for gas services by its customers, PG&E has an obligation to provide safe and reliable gas infrastructure including maintaining its existing Gas AMI system and upgrading that system as necessary to serve its customers.

PG&E's Gas AMI yields data that may be beneficial to policymakers and other entities advancing California's climate goals including the state's goal to achieve carbon neutrality by 2045. Gas AMI data may provide key insights to support the efficient planning of targeted electrification activities, potentially avoiding large gas capital investments, reducing associated future revenue requirements, and operating costs.

5. Gas Module Warranty and Supplier Quality Assurance

a. Gas Module Warranty

From 2027 through 2030, PG&E's gas module warranty claims will pertain only to current generation (Series 3000) modules and future product versions (if applicable).[47] Compared to prior periods, PG&E

---

44 2024 CGR, p. 40.

45 2024 CGR, p. 41.

46 To achieve California's decarbonization goals, the energy grid of the future will need to leverage more clean energy like wind and solar, but also renewable gases like biogas and hydrogen. While outside the scope of this proceeding, PG&E notes that the use of blended hydrogen in its gas system has potential to lower greenhouse gas emissions, can serve as a low-cost hydrogen storage and transportation medium, and provide gas system reliability and resiliency through energy diversity and redundancy. For more information, see A.22-09-006 Joint Application of Southern California Gas Company, San Diego Gas & Electric Company, and Southwest Gas Corporation to Establish Hydrogen Blending Demonstration Projects (Sept. 8, 2022) per D.22-12-057.

47 Since 2015, PG&E has deployed second-generation gas modules (Series 3000 product line) manufactured by Aclara as Aclara's legacy first-generation gas module product line (Series 500) was discontinued in that year.

forecasts reduced warranty claim amounts[48] as the vast majority of the installed and operational Series 3000 gas modules will not approach their end-of-life in this GRC period (2027-2030).[49] Additionally, PG&E and its supplier plan to implement an enhanced warranty return program to more efficiently identify failed Series 3000 modules that qualify for warranty coverage including root-cause failure analysis, if appropriate. This updated warranty return program further streamlines the claims process, thereby lowering operational costs.

b. Supplier Quality Assurance (SQA)

PG&E continues to utilize asset management best practices to mitigate supplier quality risks. The Company continually seeks to reduce or avoid costs to customers associated with these risks including monitoring gas module performance and regularly reviewing performance trends in coordination with suppliers, conducting root cause failure analyses, and troubleshooting module issues in the field, when appropriate. These rigorous standards ensure that PG&E's equipment is safe and reliable. By identifying defects early, PG&E mitigates potential maintenance and repair activities, reducing costs for customers.[50]

6. Program Is Cost-Effective vs. Status Quo

PG&E's strategy to replace gas modules through Required Maintenance and Lifecycle Replacement offers several advantages over an approach that relies solely on replacing modules as they fail. By replacing modules based on module age and failure rates in particular PG&E service areas, PG&E's Lifecycle Replacement achieves economies of scale and lowers operating costs. By coordinating the replacement of modules in a neighborhood, PG&E minimizes field technician travel time, improves work productivity, enables work bundling, allows PG&E to generate customer appointments

---

48 See WP 8-127, "Gas Module Warranty Value Summary" for a summary of claims that help to partially offset the cost of replacements from 2027 through 2030.

49 As of December 31, 2024, PG&E has approximately 2.6 million second-generation gas modules (Series 3000) in-service. Reference WP 8-9, "Current Gas Modules In-Service by Vintages (Install Year)."

50 See WP 8-128 to WP 8-130, "Gas AMI Supplier Quality Program" for additional information regarding PG&E's Supplier Quality Assurance Program.

which reduce repeat visits, and results in reduced labor costs. Lifecycle Replacement also allows PG&E to utilize field resource capacity more effectively in the spring and summer months, reducing the release and rehire of the temporary field technicians that currently perform most gas module replacement work. This more efficient resource planning reduces costs including recruiting, onboarding, training, and use of vehicles and mobile tablets. PG&E demonstrated these benefits from the results of its targeted Lifecycle Replacement work in the Kern and Sacramento Divisions in 2023 and 2024.[51]

Over the past several years, PG&E has observed that more Required Maintenance work is necessary during the winter months due to an increase in gas module failures. PG&E also has observed that colder temperatures and water intrusion affect gas module internal electronics and accelerate battery end-of-life. PG&E expects this trend to continue until 2030 when the remaining first-generation legacy modules are forecasted to be replaced. To optimize resource planning, PG&E will continue to prioritize Required Maintenance during the winter months and prioritize Lifecycle Replacement work in targeted geographic areas during the spring and summer months. This strategy allows PG&E to efficiently schedule work volumes throughout the year based on available field resource capacity. By normalizing gas module replacements throughout the year, PG&E can reduce costs associated with releasing and rehiring temporary field technicians. PG&E expects to continue to rely on temporary and regular field technicians for this work and has planned accordingly.

As shown in Table 8-6 below, implementation of Lifecycle Replacement results in a lower total net present value (NPV) vis à vis implementation of only Required Maintenance.[52]

---

51 See WP 8-22 to WP 8-27, “Gas Module Maintenance Work” for additional details regarding PG&E’s Required Maintenance and Lifecycle Replacement Programs.

52 Reference WP 8-131 to WP 8-183, “Net Present Value Economic Analysis” for NPV analysis details and assumptions.

TABLE 8-6
ECONOMIC ANALYSIS SUMMARY

Line No.	Gas Module Replacement Approach	NPV	Description
1	Gas AMI Program	$(841) million	Inclusive of all programmatic costs for the Gas AMI Program as described in this chapter.
2	Required Maintenance Only	$(850) million	PG&E only replaces modules after failure.
3	Incremental Lifecyle Replacement	$(106) million	Incremental costs of Lifecycle Replacement as described in this chapter, excluding Required Maintenance and associated common costs.
4	Incremental Required Maintenance Only	$(116) million	Incremental costs of the Required Maintenance Only approach, excluding Lifecycle Replacement and associated common costs.

E. Cost Forecasts by Major Work Category With Estimating Methodologies

1. Expense Forecast by MWC With Estimating Methodologies

The Gas AMI Program expense forecast for 2027 is $2.0 million and total expenses from 2027 through 2030 are $10.7 million. The expense forecast is summarized in Table 8-7 below.

TABLE 8-7
EXPENSE BY MWC
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Nature of Work	2027 Forecast	2028 Forecast	2029 Forecast	2030 Forecast	Total
1	EZ	Program Management	$1,086	$1,165	$1,186	$1,209	$4,646
2	DK	Call Center Operations	120	145	31	32	328
3	IS	Billing Operations	51	60	19	20	150
4	JV	Maintain IT Applications and Infrastructure O&M	778	1,556	1,600	1,646	5,580
5	Total		$2,035	$2,926	$2,836	$2,907	$10,704

PG&E forecasts expenses by: (1) determining required project management and customer outreach costs; (2) determining anticipated incremental contact center and billing support expenses; and (3) estimating the number of incremental staffing required to operate the Gas AMI head-end systems, and (4) using vendor quotes to determine annual

maintenance fees for licensed software. Descriptions of activities included in each expense MWC are provided below.

a. Program Management (MWC EZ)

PG&E's 2027 forecast of $1.1 million includes incremental expenses associated with program management activities including customer communications and outreach, contract and supplier management, technology management, developing and executing project plans, work and resource coordination, safety and employee training, business performance, financial management, and other project management functions related to the program.[53]

b. Call Center Operations (MWC DK)

PG&E's 2027 forecast of $0.1 million includes incremental program costs associated with call center operations. PG&E forecasts a total of 384,962 gas module replacements in test year 2027, compared to 339,021 modules replacements in base year 2024, an increase of 45,941 replacements above 2024 levels. Based on historical data, the increase in replacements is expected to increase incremental calls to PG&E call centers by 27 percent for Required Maintenance and 13 percent for Lifecycle Maintenance.[54]

c. Billing Operations (MWC IS)

PG&E's 2027 forecast of $0.1 million includes program incremental costs associated with billing operations. PG&E forecasts 384,962 gas module replacements in test year 2027, compared to approximately 339,021 modules replacements in base year 2024, an increase of 45,941 replacements above 2024 levels. Based on historical data, the increase in replacements is expected to increase billing exceptions

---

53 Reference WP 8-11 to WP 8-12, "Detail Expense Forecast by Major Work Category" for the calculation of incremental costs associated with program management.

54 Reference WP 8-11 to WP 8-12, "Detail Expense Forecast by Major Work Category" for the calculation of incremental costs associated with call center operations.

requiring manual processing by 2.8 percent for Required Maintenance and 2.1 percent for Lifecycle Maintenance.[55]

d. Maintain IT Applications and Infrastructure O&M (MWC JV)

PG&E's 2027 forecast of $0.8 million for IT operations and maintenance includes $0.7 million for two additional full-time resources to operate and maintain the new Gas AMI head-end systems, and $0.1 million for annual maintenance fees associated with licensed head-end software.

2. Capital Expenditure Forecast by MWC With Estimating Methodologies

PG&E's capital expenditure forecast for the Gas AMI Program is summarized in Table 8-8 below.

TABLE 8-8
CAPITAL EXPENDITURES BY MWC
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Nature of Work	2027 Forecast	2028 Forecast	2029 Forecast	2030 Forecast	Total
1	74	Install Gas AMI Gas Modules and Infrastructure	$122,915	$122,699	$105,839	$83,494	$434,947
2	2F	Build IT Applications and Infrastructure	5,010	1,945	–	–	6,955
3	Total		$127,925	$124,644	$105,839	$83,494	$441,902

PG&E forecasts capital expenditures using two main methods. The first method includes deriving 2024 labor and materials unit costs for the Gas AMI Program and multiplying the forecast of gas modules by the expected unit cost, adding an escalation where appropriate. The second method includes non-labor assumptions and escalation where appropriate. Descriptions of activities included in each capital MWC are provided below.

a. Build IT Applications and Infrastructure (MWC 2F)

PG&E forecasts $5.0 million of IT capital expenditure in 2027 and $1.9 million of capital expenditure in 2028. PG&E plans to complete the integration of its Gas AMI head-end system begun in the previous GRC

55 Reference WP 8-11 to WP 8-12, "Detail Expense Forecast by Major Work Category" for the calculation of incremental costs associated with billing operations.

period by the end of 2028. PG&E estimates the number of hours of labor each year at a fully loaded rate of $200 per hour to derive the cost estimates.[56]

b. Install Gas AMI Modules and Infrastructure (MWC 74)

PG&E forecasts $122.9 million of capital expenditure for gas modules and related infrastructure in 2027, $122.7 million in 2028, $105.8 million in 2029 and $83.5 million in 2030. The capital expenditure forecast includes the purchase and installation of gas meters and modules as part of Required Maintenance (described above in Section C.1), the purchase and installation of gas modules as part of Lifecycle Replacement (described above in Section C.2), and the purchase and installation of network communications infrastructure (described above in Section C.3).

F. Compliance with Prior Commission Decisions

In its 2023 GRC decision (D.23-11-069), the Commission denied PG&E's requested cost recovery for gas module replacements and associated Gas AMI program costs forecasted to be incurred from 2023 through 2026. Nonetheless, PG&E continued to perform necessary maintenance and program management activities to maintain its Gas AMI system and ensure the continuity of its customer billing services. However, consistent with D.23-11-069, PG&E did not include these costs in customer rates.

Additionally, in D.23-11-069, the Commission allowed PG&E to submit a separate application to further consider cost recovery associated with its Gas AMI between 2023 to 2026. PG&E subsequently filed Application A.24-03-011 (Comprehensive Gas AMI Replacement Program Application) in March 2024. The Commission's Scoping Memo was issued in October 2024 to confirm the scope of the application and outline a procedural schedule. In November 2024, the Commission issued D.24-11-010 authorizing PG&E to establish the Gas AMI Memorandum Account (GAMIMA) effective March 14, 2024. Pursuant to D. 24-11-010, PG&E filed Advice Letter (AL 5007-G/7446-E) with the Commission in December 2024 to track costs in the GAMIMA. The Commission

---

56 Reference WP 8-14 to WP 8-16, "Detail Capital Expenditure Forecast by Major Work Category" for calculations.

approved the Advice Letter in January 2025. PG&E is tracking all pertinent costs in GAMIMA.

Following Commission's decision on A.24-03-011,[57] if approved, PG&E will recover all costs recorded to the GAMIMA through the next available rate change or the next Annual Electric True-up (AET) and Annual Gas True-up (AGT). Upon approval of the AET and AGT advice letters, PG&E will file a Tier 1 advice letter to close the GAMIMA.

G. Conclusion

PG&E's Gas AMI Program proposed in this Application is necessary to continue to provide the required and affordable gas service to its over four million gas customers while providing additional safety, environmental, operations, and customer service capabilities and benefits. Based upon the information submitted above and the associated workpapers, PG&E requests that the Commission approve its 2027 to 2030 forecasted costs associated with the Gas AMI Program as presented in this chapter. PG&E's 2027-2030 cost forecasts are reasonable and prudent and should be approved by the Commission.

---

57 On March 14, 2024, Pacific Gas and Electric Company, Public Advocates Office at the California Public Utilities Commission, The Utility Reform Network, and Small Business Utility Advocates submitted a joint motion for settlement for Commission review and approval. A.24-03-011 is pending a Commission decision as of March 2025.

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 9

ELECTRIC AMI PROGRAM

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 9
ELECTRIC AMI PROGRAM

TABLE OF CONTENTS

A. Introduction 9-1
1. Scope and Purpose 9-1
2. Summary of Request 9-4
a. Expense 9-4
b. Capital Expenditure 9-5
B. Background 9-6
C. Program Description and Activities 9-8
1. Program Overview 9-8
2. Wildfire Safety and Mitigation 9-9
a. Overview and Scope of Work 9-9
1) Detection of Secondary and Service Wire Faults 9-11
2) Identification of Vegetation Contact on Secondary and Service Wires 9-13
3) Identification of Series Arcing on Primary Wires 9-13
b. Costs and Forecast 9-14
c. Cost & Benefits Overview 9-15
3. Customer Electrification 9-15
a. Overview and Scope of Work 9-15
b. Costs and Forecasts 9-20
c. Costs & Benefits Overview 9-20
1) Transformer Upgrade Deferral from Customer Electrification 9-20
2) Elimination of Customer Panel and Service Line Upgrades 9-21
4. Centralized Project Management 9-22
D. Support for Electric AMI Program 9-22

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 9
ELECTRIC AMI PROGRAM

TABLE OF CONTENTS
(CONTINUED)

1. Industry Trends Support the Program 9-22

2. Technology Obsolescence and Market Risk Mitigation 9-24

a. Technology Obsolescence 9-24

b. Supplier and Market Risk Mitigation 9-24

E. Cost Forecasts by Major Work Category (MWC) and Estimating Methodologies 9-25

1. Expense Forecasts by MWC 9-25

2. Capital Expenditures Forecast by MWC 9-25

F. Conclusion 9-26

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 9
ELECTRIC AMI PROGRAM

A. Introduction

1. Scope and Purpose

Pacific Gas and Electric Company (PG&E or the Company) respectfully submits and requests approval from the California Public Utilities Commission (CPUC or the Commission) to recover 2027-2030 forecasted costs to: (1) strategically deploy approximately 300,000 next-generation electric smart meters (also known as Electric 2.0 Meters),[1] (2) enable distributed intelligence applications ("DI apps")[2] on these meters, and (3) implement necessary improvements to its Electric Advanced Metering Infrastructure system (collectively referred to as the "Electric AMI Program").[3] As further described in this chapter, PG&E's Electric AMI Program will provide significant safety, environmental and operational benefits for customers by enabling PG&E to proactively address critical issues including enhancing wildfire risk mitigation, facilitating advancement

---

1 Electric 2.0 Meters are next-generation smart meters with the capability to use real-time data and grid-edge computing to facilitate improved operational awareness capabilities to enable enhanced energy management and grid reliability. Reference WP 9-7 to WP 9-9, "Glossary of Key Terms" for a definition of "Electric 2.0 Meters" and other key terms used in this chapter.

2 Distributed intelligence applications (DI apps) are purpose-built applications that run directly on smart meters and other grid-edge devices. These applications process data locally enabling real-time decision making without relying on a centralized utility system. These new DI apps allow smart meters to detect issues, optimize performance and communicate with other grid devices autonomously. Reference WP 9-7 to WP 9-9, "Glossary of Key Terms" for a definition of "distributed intelligence applications" and other key terms used in this chapter.

3 Reference WP 9-10 to WP 9-12, "Project Summary."

of electrification[4] and decarbonization,[5] and improving energy affordability for customers.

PG&E's Electric Advanced Metering Infrastructure ("Electric AMI")[6] system consists of an operating system, a backhaul and field network, and meter endpoints. Initially deployed between 2006-2013, PG&E designed and implemented its Electric AMI system to accommodate future technology upgrades. This system fungibility allows PG&E to deploy recently available Electric 2.0 Meters alongside current generation meters without requiring a wholesale replacement of the entire underlying AMI platform.[7] PG&E's incremental approach to enhance its Electric AMI system is key in maintaining customer affordability while helping the Company, California, and customers achieve energy and environmental goals.

PG&E's Electric AMI system continues to provide the essential data that allows it to perform critical foundational activities including producing timely and accurate customer bills and effectively managing outage responses. The Electric AMI system also provides customers with access to their electric usage data that can help them manage their energy consumption and leverage energy efficiency programs to reduce their monthly bills. PG&E's Electric AMI system also reduces PG&E operational costs through

---

4 Electrification is the process of replacing energy-consuming systems and devices that use fossil fuels with electricity-powered alternatives to reduce carbon emissions and save customers' money. Reference WP 9-7 to WP 9-9, "Glossary of Key Terms" for a definition of "electrification" and other key terms used in this chapter.

5 Statewide decarbonization goals include three million climate-friendly homes by 2030, seven million climate-friendly homes by 2035 and carbon neutrality by 2045. Reference Governor Gavin Newsom's letter to California Air Resources Board (CARB) Chair Liane Randolph, (July 22, 2022), available at: https://www.gov.ca.gov/wp-content/uploads/2022/07/07.22.2022-Governors-Letter-to-CARB.pdf (accessed April 22, 2025). Also reference Executive Order No. B-55-18 (Sept. 10, 2018), available at: https://archive.gov.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf (accessed April 22, 2025).

6 Electric AMI is PG&E's two-way communication system that securely and automatically transmits customer electric energy usage to the Company's billing system. Electric AMI includes head-end application software and network communication equipment which connect to PG&E's billing system. Reference WP 9-7 to WP 9-9, "Glossary of Key Terms" for a definition of "Electric AMI" and other key terms used in this chapter.

7 Itron is the vendor of PG&E's current Electric AMI system. PG&E's Electric AMI system is distinct as it uses mesh-network technology (from the original AMI vendor Silver Spring Network) that allows the Company to incrementally upgrade its AMI technology without replacing its entire system.

remote disconnect/reconnect, load management and outage management capabilities.

Currently available electric meter technology is far more advanced compared to the legacy technology originally deployed by PG&E and will likely continue to develop and improve.[8] As proposed herein, PG&E's Electric AMI Program will strategically deploy approximately 300,000 Electric 2.0 Meters with enhanced capabilities.[9] The strategy of deploying DI app-enabled Electric 2.0 Meters in targeted areas will enhance public safety and energy affordability for customers and support California's environmental, energy, and electrification goals. In implementing this program, PG&E will be able to leverage its existing AMI platform to unlock the benefits of Electric 2.0 Meters without a wholesale system replacement or impacting its foundational functionalities such as customer billing and the facilitation of energy efficiency programs.

In the alternative, if the Commission does not approve PG&E's request to recover 2027-2030 forecasted costs associated with this program and the Company does not implement this program, it will continue its standard process of solely replacing electric meters as they fail (known as break-fix meter replacements).[10] As the industry increasingly relies on grid-edge computing,[11] foregoing the opportunity to implement this program will preclude PG&E from leveraging the enhanced functionality of Electric 2.0

---

8 Reference WP 9-13 to WP 9-16, "Electric AMI Next-Generation Technologies" for more information.

9 See Section C of this chapter "Program Description and Activities" for details on PG&E's Electric AMI deployment plan.

10 Electric meter break-fix (also known as corrective maintenance) is PG&E's standard process to replace meters within its customer service area that have failed, are non-functional, or contribute to an unacceptable operating condition. See WP 9-7 to WP 9-9, "Glossary of Key Terms" for a definition of "electric meter break-fix" and other terms used in this chapter. Meter purchases and installations relating to break-fix and new business processes are outside of the scope of this chapter.

11 Grid edge computing is the process of processing data generated by sensors and devices on the power grid, like smart meters, directly at the source instead of sending all the data to a central data center, allowing faster real-time analysis and decision-making to optimize grid operations, improve reliability, and integrate distributed energy resources (DERs) like solar panels and electric vehicles more effectively. See WP 9-7 to WP 9-9, "Glossary of Key Terms" for a definition of "grid edge computing" and other terms used in this chapter.

Meters for specific customer benefits including wildfire risk mitigation and electrification adoption.

This chapter provides an overview of PG&E's Electric AMI Program, summarizes PG&E's 2027-2030 cost forecasts associated with the program, demonstrates the program's significant value and benefits to customers, and establishes that implementation of the program is supported by industry and technology trends.

2. Summary of Request[12]

a. Expense

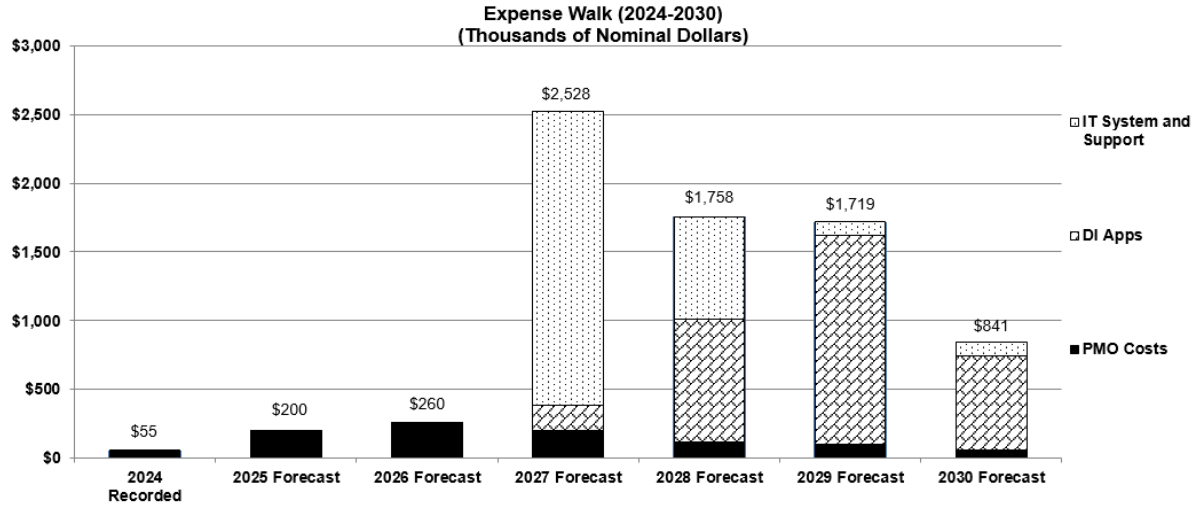
PG&E requests that the Commission adopt its 2027-2030 expense forecast of $6.8 million associated with its Electric AMI Program. PG&E's expenses include project management office (PMO) support for this program. PMO expenses include activities to efficiently plan, coordinate and execute the program with a focus on safety, quality, cost, project delivery and the overall customer experience. Responsibilities of the PMO include: (1) budget forecasting and management, (2) coordination of industry technology assessments, (3) planning and execution of PG&E's technology roadmap, (4) regularly performing electric meter lifespan analyses, (5) resource planning and work execution, (6) developing program metrics and evaluating program effectiveness, and (7) coordinating supplier and product management.

Expense costs also include vendor app maintenance and hosting, additional personnel to deploy the new DI apps on Electric 2.0 Meters, and IT system support associated with implementing these apps. Expense costs also may include management of customer communications, and any necessary employee engagement and training associated with the program. Table 9-1 below summarizes

12 See Section E, "Cost Forecasts by Major Work Category and Estimating Methodologies" for a more detailed description of cost forecasts.

PG&E's 2027-2030 expense forecast by Major Work Category (MWC).[13]

TABLE 9-1
EXPENSE FORECAST BY MWC
(THOUSANDS OF NOMINAL DOLLARS)



Note: PG&E does not have recorded expenses associated with the project prior to 2024.

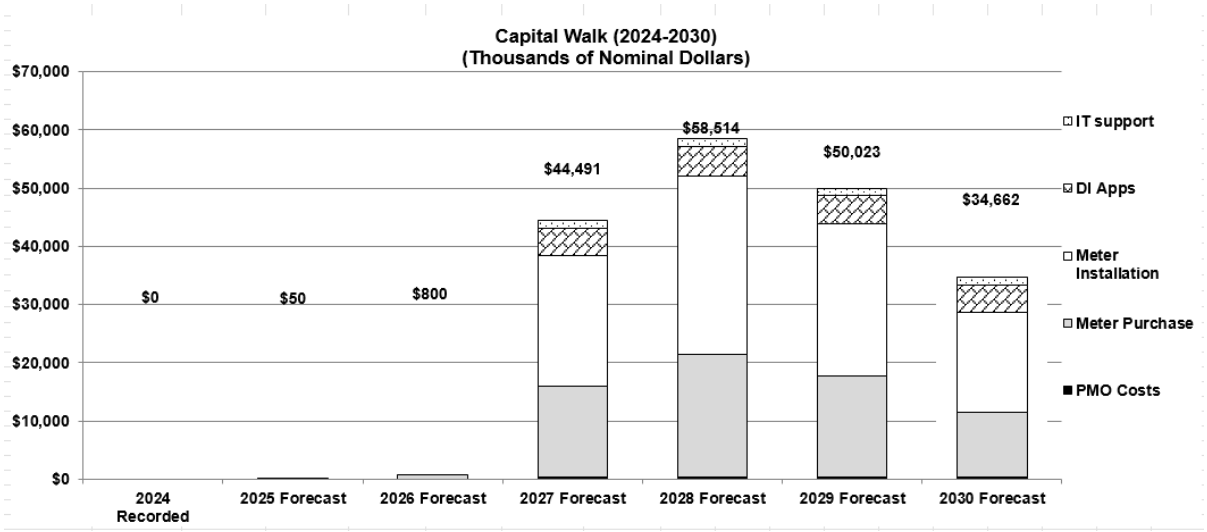
b. Capital Expenditure

PG&E requests that the Commission adopt its 2027-2030 total capital expenditure forecast of $187.7 million to support its Electric AMI Program. Capital costs associated with this program include the purchase and installation of approximately 300,000 Electric 2.0 Meters, vendor licensing costs for the development of new DI apps, IT related app development and implementation costs, and the management of the meter deployment. Table 9-2 below summarizes PG&E's 2027-2030 capital expenditure forecast by MWC.[14]

[13] Reference WP 9-1, "Recorded Adjusted and Forecast Expenses by Major Work Category (Nominal Dollars)." PG&E intends to file an Errata with the Commission to add MWC JV (or other appropriate MWCs) and move IT related support costs from MWC EZ to MWC JV.

[14] Reference WP 9-3, "Forecast Capital Expenditures by Major Work Category (Nominal Dollars)." PG&E intends to file an Errata with the Commission to add MWC 2F (or other appropriate MWCs) and move IT related support costs from MWC 25 to MWC 2F.

TABLE 9-2
CAPITAL EXPENDITURE FORECAST BY MWC
(THOUSANDS OF NOMINAL DOLLARS)



Note: PG&E does not have recorded capital costs associated with this project prior to 2025.

B. Background

Between 2006 and 2013, PG&E deployed its original Electric AMI system including approximately 5.6 million electric smart meters and supporting software, hardware, and network communication platform. PG&E was an early adopter of AMI technology and one of the first gas and electric utilities to deploy AMI at such a large scale. Since its initial deployment, PG&E's Electric AMI system has provided significant benefits to customers including time-varying tariff rate capabilities and automated electric usage data collection, which has become the foundation for timely and accurate customer billing. Electric AMI enables customers to better manage their electric consumption through energy usage tools, time-of-use rates, demand response programs, outage information and numerous energy efficiency programs. In addition, PG&E's Electric AMI system continues to provide additional cost savings for customers by eliminating long-term operational costs such as manual meter reading and on-site meter disconnection and reconnection service.

With its Electric AMI Program, PG&E will strategically start deploying a new generation of electric smart meters with advanced functional and analytical capabilities. These DI app-enabled meters will significantly benefit customers by enhancing wildfire risk mitigation, facilitating electrification, and supporting customer energy affordability. PG&E is uniquely positioned to leverage its

existing Electric AMI platform to roll out new DI apps with enhanced capabilities without a wholesale AMI system replacement. This system adaptability facilitates PG&E's ability to efficiently maintain and upgrade its existing AMI system. Routine firmware, software, and security updates keep the AMI platform up-to-date, while continuous investments in network infrastructure enhance speed, reliability, and capacity. PG&E's current AMI system is designed for seamless integration, allowing new DI apps to be added without disrupting existing operations. By upgrading and staying current with timely software releases, PG&E is able to deploy new capabilities more quickly and cost effectively.[15]

The increasing use of electric smart meters deployed by utilities over the past ten years has in many ways paralleled the tremendous growth of smartphones. Both are electronic communication devices embedded with microprocessors, memory, and modems whose affordability have increased with the reduction in computing, storage, and bandwidth costs. Meter equipment and network vendors are now adopting the smartphone "app store" model as well. Specialized features packaged as purpose-built code are published by the meter vendor or third-party developer to the smart meter store, to be downloaded to run on a utility's smart meters to accomplish a specific goal. Whereas the first generation of smart meters concentrated on helping consumers manage their energy usage, apps now are increasingly available for utilities to maintain the health of the grid by alerting anomalies[16] or concerning load and voltage patterns found on the electric distribution network.

As further detailed in the next section, PG&E's Electric AMI Program includes deploying and enabling approximately 300,000 Electric 2.0 Meters with

---

15 PG&E plans to advance Electric AMI 2.0 with a standards-based approach to enhance grid efficiency, security, and interoperability. The Company collaborates with the Edison Electric Institute (EEI) NextGen AMI Subcommittee and LF Energy Grid Edge Interoperability & Security Alliance (GEISA) to align with industry best practices for cybersecurity, and hardware and software interoperability.

16 Anomaly detection uses data analysis techniques to identify unusual patterns in electricity consumption data that may indicate potential issues like equipment malfunction, power theft, or unexpected energy usage spikes – allowing electric utilities to proactively address problems before they cause significant disruptions. See WP 9-7 to WP 9-9, "Glossary of Key Terms" for a definition of "anomaly detection" and other terms used in this chapter.

DI apps that have demonstrated critical benefits to customers including mitigation of wildfire risks and support of electrification.

C. Program Description and Activities

1. Program Overview

PG&E's Electric AMI Program will begin to strategically deploy next-generation Electric 2.0 Meters from 2027 through 2030 by replacing approximately 300,000 of the approximately 6 million legacy smart meters currently at customer locations constituting around 5 percent of the total electric meter population. PG&E will deploy these Electric 2.0 Meters in locations where they provide the most value to support enhanced wildfire risk mitigation, advance grid management capabilities and support customer electrification initiatives. Where it makes economic sense, PG&E will invest in the development and implementation of DI apps necessary to leverage the enhanced capabilities of Electric 2.0 Meters – for example, like fault anomaly detection apps that would run on the Electric 2.0 Meters strategically deployed in areas of high wildfire risk. PG&E's Electric AMI system will require targeted upgrades to unlock the capabilities of Electric 2.0 Meters and associated DI apps. The incremental program costs associated with the IT development and vendor licensing for new app development are included in the scope of this program forecast.[17]

Through this investment, PG&E's Electric AMI Program will provide significant value to customers, support critical wildfire risk reduction efforts and customer electrification goals, and capture the operational benefits of advanced electric meter capabilities. PG&E expects that these DI app-enabled Electric 2.0 Meters will significantly reduce or delay maintenance and upgrades of electric service transformers resulting in substantial cost savings and supporting customer affordability. In addition, the program will reduce electric meter supply risk as manufacturers ramp-down production of older generation meters and eventually

[17] Costs associated with PG&E's ongoing system-wide Electric AMI maintenance are not included in this chapter's forecast. Electric AMI system maintenance and upgrades are included in PG&E Exhibit (PG&E-7), Ch. 7, IT & Data Management.

discontinue production of these meters altogether along with related components and support systems.

The following sections of this chapter further describe the proposed components of PG&E's Electric AMI Program:

- **Wildfire Safety and Mitigation:** Enhanced wildfire detection and protection on PG&E's electric secondary distribution network by: (1) strategically deploying approximately 150,000 Electric 2.0 Meters; (2) enabling apps to enhance wildfire safety and risk mitigation capabilities of these meters; and (3) upgrading the Electric AMI system as needed to enable the advanced capabilities of these meters.
- **Electrification:** Support of customer electrification adoption by reducing the need for electrical service panel, service wire, secondary conductor, and transformer upgrades by: (1) deploying approximately 150,000 Electric 2.0 Meters; (2) enabling apps on these meters to automatically manage and shift customer electric load if needed, and (3) upgrading the Electric AMI system as needed to enable the advanced capabilities of these meters.

2. Wildfire Safety and Mitigation

a. Overview and Scope of Work

As part of its Electric AMI Program, PG&E proposes to strategically install approximately 150,000 Electric 2.0 Meters during the 2027-2030 GRC period in areas with high wildfire risk, where the required density of these advanced electric meters could identify potential primary, secondary, and individual electrical service issues.[18] PG&E will implement DI apps on these meters and complete necessary upgrades to its Electric AMI system to enable the functionality of these meters for wildfire safety and risk mitigation purposes. PG&E's installation of 150,000 Electric 2.0 Meters will target Tier 3 High Fire Threat Districts

[18] Deployment of 150,000 Electric 2.0 Meters will cover approximately 51 percent of electric meters in PG&E's Tier 3 HFTD areas and approximately 20 percent of electric meters in PG&E's HFTD overall. This coverage will enable sufficient density in prioritized circuit segments to help mitigate potential ignitions and prepare PG&E to scale deployment in the future.

(HFTD)[19] representing PG&E's customer service areas with the highest wildfire risk. These meters will be installed with sufficient density on prioritized circuit segments to identify common issues across secondary circuit segments and individual service lines representing approximately 51 percent of electric meters in PG&E's Tier 3 HFTD.[20] PG&E will prioritize circuit segments[21] based on wildfire risk as determined in the Wildfire Distribution Risk Model (WDRM).[22] Deployment of these Electric 2.0 Meters, DI apps and AMI system upgrades will enhance wildfire ignition detection and protection on PG&E's electric distribution network through three use cases: (1) detection of faults on secondary and service wires[23] to help prevent cascading failures; (2) identification of vegetation contact on secondary wires; and (3) identification of series arcing on primary wires that can evolve into outages or ignitions.[24]

---

19 The High Fire Threat Districts (HFTD) map, adopted by the Commission in January 2018, designates three types of fire threat area: Tier 3 ("extreme risk"), Tier 2 ("elevated risk"), and a much smaller Zone 1 (made up of areas on the California Department of Forestry and Fire Protection /U.S. Forest Service High Hazard Zones map that are not subsumed within the Tier 2 and Tier 3 HFTD areas). See D.17-12-024, p. 158, Ordering Paragraph 12, and Appendix D. See WP 9-7 to WP 9-9, "Glossary of Key Terms" for a definition of "HFTD" and other terms used in this chapter.

20 As of May 2024, approximately 290,000 electric meters were located in PG&E's Tier 3 HFTD. PG&E's Electric AMI Program deploying approximately 150,000 Electric 2.0 Meters represents approximately 51 percent of the total meters in PG&E's Tier 3 HFTD.

21 PG&E currently has 617 circuit segments in Tier 3 HFTD. PG&E will prioritize the installation locations of Electric 2.0 meters by matching circuits in Tier 3 HFTD with the Wildfire Distribution Risk Model (WDRM).

22 The WDRM provides predictions of where, why, and how much wildfire risk occurs during a typical wildfire season, quantifies risk for equipment, and contact risk drivers. PG&E's installation of Electric 2.0 Meters pursuant to this program will be based on the most recently updated risk model at the time of deployment planning.

23 Fault location detection is the process of identifying the precise location of a disruption in the electrical circuit within a distribution system, typically using specialized monitoring equipment and algorithms to analyze voltage and current measurements, allowing utilities to quickly isolate and efficiently restore power to affected areas. See WP 9-7 to WP 9-9, "Glossary of Key Terms" for a definition of "fault location" and other terms used in this chapter.

24 Series arcing faults involve thermal build-up due to high-resistance terminations or connectors. These can occur when there are bad connections or splices, switch mis-operation, or other forms or arcing contact on electrical equipment.

1) Detection of Secondary and Service Wire Faults

In PG&E's service area, secondary and service level ignitions accounted for approximately 16 percent of all ignitions reported to the Commission from 2020 to 2024.[25] By using advanced algorithms on detected grid parameters like voltage and current, electric meter DI apps can more quickly identify abnormal conditions and produce alerts for necessary corrective actions. For secondary and service fault detection, PG&E currently has limited visibility into asset health on these wires and therefore cannot monitor faults and other risks that may cause ignitions on those lines. The installation of next-generation Electric AMI technologies provides this visibility to allow PG&E to take corrective actions sooner.

PG&E's Electric Program Investment Charge (EPIC)[26] 3.43 project deployed and evaluated new technologies to determine if they can reliably alert anomalies on its electric distribution system that may lead to ignitions.[27] The EPIC 3.43 project focused on the merit of two DI apps ("Location Awareness" and "High Impedance"

---

25 Reference WP 9-17, "Reportable Ignitions in PG&E Service Area." All ignitions reported to the CPUC in prior years are available at: https://www.cpuc.ca.gov/industries-and-topics/wildfires (accessed April 23, 2025).

26 The Commission established the Electric Program Investment Charge (EPIC) in 2011 and renewed the program in 2020. The Commission's mission for EPIC is to "invest in innovation to ensure equitable access to safe, affordable, reliable, and environmentally sustainable energy for electricity ratepayers." In D.21-11-028, the Commission instructed PG&E, along with Southern California Edison and San Diego Gas & Electric, to each file an EPIC Investment Plan Application covering the years 2021-2025 (this period is known as EPIC 4).

27 See EPIC Interim Report, Riva Meter Distributed Intelligence Evaluation, (Oct. 16, 2024) for a description and preliminary results of PG&E's EPIC 3.43 project. PG&E is drafting the final report at the time of the submission of this testimony. When complete, the final report will be available at: https://www.pge.com/en/about/corporate-responsibility-and-sustainability/taking-responsibility/emerging-electric-technology-programs.html#tabs-d02cb684bb-item-5c49c0f2ab-tab.

apps)[28] loaded on approximately four hundred Electric 2.0 Meters with functionality to potentially lower the risk of outages and ignitions. The project demonstrated that the Location Awareness app was highly accurate in both identifying mistakes and providing missing critical information on how the electric distribution network is wired. Correcting instances when the wrong transformer is registered to a service drop can identify instances of transformer overloading, which in turn can reduce the risk of overheating or arcing that may lead to an ignition. The project also found that the High Impedance app was highly accurate in identifying conductor and connection anomalies consistent with potential ignitions along the shared secondary network.[29] For example, the High Impedance app correctly identified faults that occurred between the meter panel and the secondary side of the transformer on four of the 410 app-enabled electric meters (approximately 1 percent of installations). In all instances, these fault anomalies detected in the secondary and service wires were quickly corrected before any ignitions occurred.[30] PG&E estimates that the approximately 150,000 DI app-enabled Electric 2.0 Meters that the Company deploys potentially may prevent between two to four ignitions per year.[31]

---

28 The "Location Awareness" app identifies misregistered meter-transformer pairs that may indirectly identify transformers that are servicing loads that are too large for the transformer's capacity. This app also identifies the phase of transformers which provides visibility to load imbalances by phase. The "High Impedance" app potentially decreases outage and ignition risk by identifying service drops with an anomaly between meter panels and the terminals on the secondary side of the service transformer.

29 High impedance faults describe a situation where a power line contacts a surface that has high electrical resistance, like a tree branch, resulting in fault current too low to be detected by standard overcurrent protection devices (i.e., the fault current is too small to trigger a protective relay to trip the circuit), making it difficult to identify and potentially causing safety hazards due to arcing. See WP 9-7 to WP 9-9, "Glossary of Key Terms" for a definition of "high impedance" and other terms used in this chapter.

30 See EPIC Interim Report, Riva Meter Distributed Intelligence Evaluation, (Oct. 16, 2024), pp. 23-27.

31 Reference WP 9-21, "Potential Secondary Ignition Preventions."

In conjunction with its EPIC 3.43 project, PG&E's EPIC 4.20 project[32] is piloting next-generation AMI technology that addresses gaps that current electric meters have in detecting risk precursors and potentially will enable PG&E to measurably reduce equipment failures, outages, and ignitions as well as make inspections more effective. As the benefits of these and other DI apps are validated by PG&E and other utilities, PG&E will begin to capitalize on these benefits by enabling these apps on the Electric 2.0 Meters strategically deployed as part of its Electric AMI Program.

2) Identification of Vegetation Contact on Secondary and Service Wires

From 2020 through 2024, 46 percent of ignitions associated with service drops in HFTDs within PG&E's service area were caused by vegetation with 23 suspected vegetation-caused service drop ignitions in HFTDs during this period.[33] PG&E deploys layers of wildfire protection that are largely focused on primary lines and equipment, not secondary conductor and service drops. DI app-enabled Electric 2.0 Meters help to close this gap by identifying vegetation contact, faulty splices, and loose connections on wires via voltage anomalies at the meter that may be a precursor to failures and ignitions.

3) Identification of Series Arcing on Primary Wires

PG&E's current wildfire mitigation measures on primary wires, such as Enhanced Powerline Safety Settings (EPSS) and Down Conductor Detection, are unable to detect series arcing faults.[34]

---

32 When initial EPIC project findings are complete, the report will be available at: https://www.pge.com. Search "Emerging Electric Technology Programs" and click on "Project Reports."

33 Reference WP 9-18, "Ignition Trends HFTD Distribution Service", data as of December 31, 2024.

34 Series arcing can persist from hours to days, building up heat and often melting electric equipment before it causes an ignition or an outage. For traditional protection devices, series arcing mimics normal load on the system, so it appears normal on monitoring systems. For ignitions attributed to series arcing, no precursors have been identified through inspections or outages before the ignitions were detected.

Electric 2.0 Meters can close these gaps by detecting and locating faults that are not detected by traditional protection mechanisms. These enhanced meter capabilities can prevent ignitions and outages by identifying equipment issues and enabling a response before an ignition occurs.

By installing approximately 150,000 Electric 2.0 Meters in Tier 3 HFTDs, PG&E will provide an initial step toward essential fault detection and grid monitoring coverage in wildfire areas. Installing these meters on all feeders on secondary lines will enable detection of issues on both secondary (such as service wire faults and vegetation contact) and primary electric lines (such as series arcing) currently not available.[35]

b. Costs and Forecast

Table 9-3 below depicts the forecasted deployment of DI app-enabled Electric 2.0 Meters to be installed for wildfire risk mitigation purposes including forecasted costs associated with meter purchases, meter installation labor, meter apps, IT systems and support, and project management.[36]

TABLE 9-3
FORECASTED INCREMENTAL UNITS AND COSTS
FOR WILDFIRE SAFETY & MITIGATION PROGRAM 2027-2030

Line No.	Wildfire Safety & Mitigation Program	2027	2028	2029	2030	Total
1	Volume in Units					
2	Electric 2.0 Meters Deployed	47,000	66,000	32,500	4,500	150,000
3	Thousands of Nominal Dollars					
4	Capital Expenditures	$27,499	$38,962	$19,975	$4,101	$90,537
5	Expense	$1,220	$682	$498	$134	$2,534

35 This portion of the program is a climate-informed investment that supports wildfire risk reduction mitigation efforts. For more information on what climate resilience means at PG&E, where PG&E is in its journey to build climate resilience, and the relationship between this GRC filing and PG&E's climate resilience journey, see Exhibit (PG&E-2), Ch. 1.

36 Reference WP 9-19 to WP 9-20, "Wildfire Safety & Mitigation Meter Deployment Volume and Cost Assumptions" for more information.

c. Cost & Benefits Overview

PG&E expects that the installation of approximately 150,000 DI app-enabled Electric 2.0 Meters with fault anomaly detection capabilities in Tier 3 HFTDs will significantly contribute to the Company's mitigation of wildfire caused by secondary and service wire ignitions. PG&E's ability to identify fault conditions in near real-time has significant wildfire safety benefits including the following:

- **Early Detection and Response** – Fault sensing technology identifies anomalies in milliseconds enabling swift corrective action before a fault can lead to an ignition.
- **De-energization of Hazardous Lines** – When a high-risk fault is detected, affected circuits can be de-energized swiftly to prevent arc flashes, sparks, or downed live conductors from igniting dry vegetation.
- **Reduction of Fire Starts Caused from Equipment Failures** – Fault sensing helps pinpoint failing equipment before catastrophic malfunctions occur, reducing likelihood of electrical ignitions.
- **Enhanced Situational Awareness** – Operators receive near real-time grid data, improving decision making and allowing for pre-emptive maintenance.
- **More Accurate Identification of Fault Conditions** – This technology will augment human inspection to provide enhanced identification of potential fault conditions.

3. Customer Electrification

a. Overview and Scope of Work

In addition to the approximately 150,000 DI app-enabled Electric 2.0 Meters that PG&E will install to mitigate wildfire risk, the Company will deploy approximately 150,000 Electric 2.0 Meters to support customer electric vehicle (EV) adoption and home electrification.[37] PG&E will enable DI apps on these meters and upgrade its Electric AMI system as necessary to provide these meters with the functionality to automatically

[37] The actual volume of Electric 2.0 Meters deployed will be driven by customer adoption rate for EV charging programs and other electrification initiatives.

manage and shift customer electric load if needed. PG&E expects that unlocking the capabilities of Electric 2.0 Meters to support customer electrification will drive adoption of EVs, defer electric distribution investments, and enable load management solutions that negate home electrical service panel upgrades by customers. These enhancements will promote customer electrification at a lower cost to customers and provide customers with real-time access to electric consumption data to help them better manage their energy usage.

Customer electrification is of paramount importance with the increasing emphasis on sustainability, decarbonization, EV adoption, and reduction of greenhouse gas (GHG) emissions. Current statewide decarbonization goals include three million climate-ready and climate-friendly homes by 2030 and seven million climate-friendly homes by 2035[38] with a goal of carbon neutrality by 2045.[39] An ongoing challenge for the State of California and electric utilities is how to maintain customer energy affordability while promoting electrification.

Approximately half of all residential electrical panels in California are rated to accommodate fewer than 200 amps[40] and approximately one-third of California single-family homes have older 100-amp electrical panels that may not provide the required capacity for their current and future electrical needs.[41] Increasing the electrical load in these homes,

---

38 Governor Gavin Newsom's letter to California Air Resources Board (CARB) Chair Liane Randolph, (July 22, 2022), available at: https://www.gov.ca.gov/wp-content/uploads/2022/07/07.22.2022-Governors-Letter-to-CARB.pdf (accessed April 22, 2025).

39 Governor's Executive Order No. B-55-18 (Sept. 10, 2018), available at: https://archive.gov.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf (accessed April 22, 2025).

40 SPUR, "Solving the Panel Puzzle," (May 2024), p. 8, available at: https://www.spur.org/sites/default/files/2024-05/SPUR_Solving_the_Panel_Puzzle.pdf (accessed April 22, 2025).

41 Lawrence Berkeley Lab, "Electrical Service Panel Capacity in California Households with Insights for Equitable Building Electrification" (August 2024), p. 9, available at: https://homes.lbl.gov/sites/default/files/2024-08/aceee_2024_panels_in_ca.pdf (accessed April 22, 2025).

especially to charge EVs with a Level 2 charger[42] or to add an electric heat pump, likely will require costly electrical panel and/or service line upgrades. These upgrades are a substantial barrier for customer electrification, typically costing customers between $2,000 to $4,500 to upgrade the electrical service panel alone.[43] Including potential service upgrades and other costs, customer out-of-pocket costs may reach $30,000.[44] In many instances, PG&E's Electric AMI Program will enable customers to avoid paying for these costly upgrades through deployment of next-generation electric meter technology. Preventing electrical panel and/or service line upgrades also will save customers time and remove EV adoption barriers by simplifying and reducing customer touchpoints that otherwise would be required to electrify their homes.

Electrical panel, service line and associated distribution system upgrades should be avoided as much as possible to minimize costs for customers. California policies coupled with consumer market electrification trends reinforce the need to mitigate service panel and/or service transformer upgrades at scale and remove customer electrification barriers. By 2035, all new in-state passenger vehicles

---

42 A Level 2 EV charger is a device that uses 240-volt AC power to charge an EV battery. See WP 9-7 to WP 9-9, "Glossary of Key Terms" for a definition of "Level 2 EV Charger" and other terms used in this chapter.

43 Customer costs are categorized by (1) the service upgrade paid to the utility; (2) the customer-owned electrical panel upgrade paid to a third-party contractor; and (3) other customer costs such as trenching. Costs include labor, materials, and permit costs. NV5, "Service Upgrades for Electrification Retrofits Study Final Report," (May 27, 2022), pp. 5-6 available at: https://pda.energydataweb.com/api/view/2635/Service%20Upgrades%20for%20Electrification%20Retrofits%20Study%20FINAL.pdf (accessed April 22, 2025).

This study was conducted on behalf of PG&E and San Diego Gas & Electric to examine the processes and costs required to upgrade electrical service capacity when completing residential electrification retrofits.

44 Customer costs depend on factors like meter and pole location, construction and trenching requirements, and distance to the distribution infrastructure. Additional customer costs may include trenching, permits, conduit replacements, and potential pole and transformer partial cost replacements. NV5, "Service Upgrades for Electrification Retrofits Study Final Report" (May 27, 2022), p. 6.

sales will need to be zero-emissions vehicles,[45] of which a majority will be electric. PG&E is already beginning to realize the effects of these electrification policies. EV adoption in PG&E's service territory is among the highest in the nation, upwards of 40 percent of new vehicle sales in some counties,[46] with nearly one in eight EVs in the U.S. in PG&E's service area.

Recent studies commissioned by the Commission estimate the need for $26 billion to $50 billion in traditional distribution grid upgrade investments by 2035 to meet California electrification goals – assuming load management measures are not implemented.[47] PG&E's deployment of DI app-enabled Electric 2.0 Meters is a critical step to mitigate these costs and other barriers for customer adoption of home electrification.

PG&E currently is validating the efficacy of DI app-enabled Electric 2.0 Meters in mitigating the need for customers to upgrade their electrical service panel when pursuing electrification efforts in their

---

45 California Air Resources Board (CARB) Advanced Clean Cars II rule establishes a year-by-year roadmap so that, by 2035, 100 percent of new cars and light trucks sold in California will be zero-emission vehicles, including plug-in hybrid electric vehicles. See California moves to accelerate to 100 percent new zero-emission vehicle sales by 2035 (Aug. 25, 2022), available at: https://ww2.arb.ca.gov/news/california-moves-accelerate-100-new-zero-emission-vehicle-sales-2035. The regulation codifies the light-duty vehicle goals set out in Governor Gavin Newsom's Executive Order N-79-20. See Governor's Executive Order No. N-79-20 (Sept. 23, 2020), available at: https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf (accesses April 22, 2025).

Additionally, see Exhibit (PG&E-4), Ch. 10, Section B for a broader discussion of electrification policies driving adoption and demand.

46 California Energy Commission, "New ZEV Sales in California" available at: https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics-collection/new-zev (accessed April 22, 2025).

47 The Public Advocates Office "Distribution Grid Electrification Model Findings," Technical Report (August 1, 2024), available at: https://www.publicadvocates.cpuc.ca.gov/press-room/reports-and-analyses/distribution-grid-electrification-model-findings (accessed April 22, 2025). Reference also "Electrification Impacts Study Part 1: Bottom-Up Load Forecasting and System-Level Electrification Impacts Costs Estimates," p. 6, dated May 9, 2023 (Proceeding R.21-06-017, Order Instituting Rulemaking to Modernize the Electric Grid for a High Distributed Energy Resources Future).

Reference also AES Indiana/Camus, "Getting ahead of the EV Tipping point", (October 2024), p. 5, available at: https://www.aes.com/sites/aes.com/files/2024-10/Electric-Vehicle-EV-Charging-FINAL.pdf (accessed April 23, 2025).

homes. PG&E's ongoing EPIC 4.02 project[48] will pilot up to 1,000 Electric 2.0 Meters in residential homes to allow customers with less than 200 amp electrical service panels to use Level 2 EV charging without upgrading the panel or the residential electrical service.[49] This solution will wirelessly connect customer-owned EV chargers to the Electric 2.0 Meters which will run an application that continuously measures the load on the electrical service panel, secondary service wire and service transformer. The application will post limits to the charger and reduce a customer's residential electric usage in real-time, avoiding or deferring the need for upgrades.[50]

The EPIC 4.02 project is providing PG&E with the core capabilities to assist its customers in electrifying their homes by avoiding electrical service panel and secondary service upgrades.[51] PG&E will leverage and apply the foundational knowledge obtained from this EPIC pilot to its Electric AMI Program to scale to its larger customer base. This technology is readily expandable to any electrification load (not only EVs) and has the potential to eliminate the need for electrification-driven service panel upgrades. In addition, this technology may allow PG&E to defer secondary transformer upgrades, deferring significant costs in support of customer affordability.[52]

---

48 When initial project findings are complete, the report will be available at: https://www.pge.com. Search "Emerging Electric Technology Programs" and click on "Project Reports."

49 Deferred residential electrical service includes distribution transformer, secondary and service upgrade work to serve increased loads related to residential EV charging. The total cost of a residential service upgrade includes equipment, materials, labor, and other costs of adding load to the associated secondary system.

50 Funding for PG&E's EPIC 4.02 project includes costs associated with distributed intelligence (DI) system implementation that enables the functionality allowing customers with less than 200-amp electrical service panels to use Level 2 EV home charging without customer panel upgrades or residential transformer upgrades.

51 As part of its EPIC 4.02 project, PG&E is coordinating with vendors to enable miniature add-on electrical service panels ("smart panels") that allow customers to add electric load to their homes without requiring upgrades to their existing service panels.

52 Service wires, service transformers and secondary transformers may still need to be replaced based on age, low voltage, secondary configuration, and existing overloads.

b. Costs and Forecasts

Table 9-4 below depicts the forecast costs associated with the Electric AMI Program from 2027 through 2030 based on the installation of approximately 150,000 Electric 2.0 Meters.[53] The forecast includes costs associated with meter purchases, meter installation labor, meter app development and licensing, IT support to deploy the apps, and project management.

TABLE 9-4
FORECASTED INCREMENTAL UNITS AND COSTS
FOR CUSTOMER ELECTRIFICATION PROGRAM 2027-2030

Line No.	Customer Electrification Program	2027	2028	2029	2030	Total
1	Volume in Units					
2	Electric 2.0 Meters Deployed	25,000	28,000	47,000	47,000	147,000
3	Thousands of Nominal Dollars					
4	Capital Expenditures	$16,992	$19,552	$30,048	$30,562	$97,154
5	Expense	$1,308	$1,076	$1,221	$707	$4,312

c. Costs & Benefits Overview

1) Transformer Upgrade Deferral from Customer Electrification

When customers increase electric load (e.g., by installing an EV charger at their home), it can contribute to the overload and premature aging of the secondary transformer serving that location. With the expected continued rise in EV adoption and an overall increase in electrification in California, PG&E's Electric AMI Program will help mitigate this risk by installing approximately 150,000 Electric 2.0 meters enabled with automated electric load balancing technology for customers electrifying their homes. The DI apps enabled on these meters will query customer meters attached to the same secondary transformer and limit load based on the capacity of the secondary transformer.

---

53 Reference WP 9-22 to WP 9-23, "Customer Electrification Meter Deployment Volume and Cost Assumptions."

This technology will help prevent transformer overload, defer transformer upgrades, and reduce operational costs while allowing customers to manage their electric service load. PG&E's economic analysis demonstrates that implementation of this technology pursuant to this program results in a lower total net present value (NPV) than if not implemented. Over a 15-year period, the NPV of not implementing this technology is approximately $2.0 billion versus approximately $1.4 billion if implemented – a savings of approximately $600 million. These savings exceed the total implementation cost of this program.[54]

2) Elimination of Customer Panel and Service Line Upgrades

Customer expenses associated with EV adoption and electrification in general can be a significant barrier to customers seeking to electrify their homes.[55] Many new EV customers will need to upgrade their electrical service panels, especially those who reside in older homes. Customer costs to upgrade service panels range from $2,000 to $4,500, not including other potential costs to customers such as trenching, permits, easements, conduit replacements, and potential pole and transformer replacements. In addition, a significant percentage of customers currently requesting an EV rate fail an electrical service line audit. According to one report from May 2022, the upgrade costs paid by customers can range from $300 to $16,000[56] in excess of the service upgrade

---

54 Reference WP 9-24 to WP 9-35, "Transformer Upgrade Deferral Economic Analysis" showing the economic analysis and assumptions used to determine the net present value (NPV) of the alternatives.

55 An estimated 50 percent of single-family homes in PG&E's service territory have less than 200-amp electrical service capacity. "Solving the Panel Puzzle," SPUR, (May 2024), p. 8.

56 The factors that determine these costs include meter and pole location, construction and trenching requirements, and distance to the distribution infrastructure. NV5, "Service Upgrades for Electrification Retrofits Study Final Report," (May 27, 2022), p. 6.

residential allowance of $2,154 at that time.[57] PG&E's Electric AMI Program will mitigate electrical panel, service line and/or transformer upgrades, directly saving customers money when electrifying their homes and indirectly through deferred upgrades to PG&E assets like transformers. Using conservative cost estimates, the total estimated customer avoided costs from this program over the 2027-2030 GRC period is approximately $905 million or an average of $6,155 per customer.[58] Avoiding these costs can serve as a catalyst for customers to switch to EVs or electrify their homes sooner than they otherwise would.

4. Centralized Project Management

PG&E will manage its Electric AMI Program via a centralized PMO. In conjunction with its sourcing organization, the PMO will be responsible for contract and supplier management. The PMO will coordinate with key organizations throughout PG&E to ensure that the program is implemented on-schedule, and within scope and budget. To ensure the program successfully meets its objectives, the PMO will develop an Electric AMI technology roadmap to continually evaluate capabilities of next-generation AMI electric meters, equipment, and technologies. The PMO also will develop near-term and longer-term Electric AMI technology lifecycle management and risk mitigation strategies. Customer communications and external outreach will be included in this program where appropriate.

D. Support for Electric AMI Program

1. Industry Trends Support the Program

PG&E's original Electric AMI implementation began almost two decades ago, and the Company continues to work with its vendor partners to best

---

57 Electric Rules 15 and 16 are electric utility tariff rules that outline requirements for PG&E distribution line extensions and service line extensions. Per Rule 15, the current residential allowance for distribution line extensions, service extensions, or a combination thereof, for a permanent residential service is $3,255 per meter or dwelling unit (Rule 15, Section C). Per Rule 16, the allowance will first be applied to the residential service facilities with any excess allowance applied to the distribution line extension to which the service extension is connected.

58 Reference WP 9-36, "Customer Avoided Costs of Electric Panel and Service Line Upgrades."

utilize the data and capabilities that AMI technology provides to benefit customers. AMI enables robust two-way communication between electric utilities and their customers, provides new and expanded services for customers, and enhances energy grid resiliency and operations. PG&E and other electric utilities leverage smart meter data to monitor the health of the energy grid, restore electric service more quickly when outages occur, integrate distributed energy resources (DERs), and deliver energy services and solutions to customers. PG&E is uniquely positioned as its existing Electric AMI platform allows the Company to deploy and enable Electric 2.0 Meters with advanced functionality to meet the demands of today's electric grid without a wholesale replacement of its Electric AMI system which is a key value in maintaining customer affordability.

Next-generation AMI solutions can leverage data beyond billing and grid outage restoration. Electric utilities can apply these advanced technologies to deploy customer-centric solutions and improve utility planning and operations.[59] The advanced capabilities of Electric 2.0 Meters will enable PG&E to better understand how electricity is used in real time or near real-time for the benefit of its customers. Leveraging advanced AMI technologies is a key part of PG&E's transition to a cleaner energy grid and its strategy to meet decarbonization goals. Enhanced AMI capabilities will provide customers with energy management and demand response programs that shift electricity usage away from peak demand times. As the number of connected home and building devices like smart thermostats continues to grow, customers will have more opportunities to save energy and money while reducing carbon emissions. Electric 2.0 Meters have the capability to dynamically manage DERs, meet EV charging demands, support grid balancing, and integrate more renewables and grid interactive

[59] Electric utilities can leverage advanced AMI capabilities for grid management benefits including: (1) load disaggregation, (2) fault location and prediction analysis, (3) high impedance fault detection, (4) detection of anomalies and equipment health issues on low voltage secondary lines, (5) monitoring of service transformers, and (6) detection of energy diversion or theft.

assets. These meters also will enhance security since edge devices can store and process sensitive data locally.[60]

2. Technology Obsolescence and Market Risk Mitigation

a. Technology Obsolescence

PG&E's current Electric AMI system uses 15-year-old technology that retains its core functionality of providing accurate and timely electric usage data for billing and providing customers access to their electric usage data. While this system continues to provide significant benefits to customers as originally designed nearly two decades ago, it is not equipped to address all the critical challenges of the modern electric grid. PG&E's upgrades to its Electric AMI system will unlock the benefits of currently available and future DI apps discussed earlier in this chapter.

PG&E initially will implement these new Electric AMI technologies strategically and incrementally by building modular, scalable systems, and validating customer benefits prior to a wider deployment. By adopting emerging Electric AMI technologies and integrating real-time data analytics, PG&E will be able to enhance its smart grid management capabilities including data-driven decision-making to help predict and address potential grid issues proactively. As it implements these emerging AMI technologies, PG&E will maintain robust cybersecurity and privacy standards to ensure customer data security and the security of the Electric AMI system.

b. Supplier and Market Risk Mitigation

PG&E currently purchases electric meters from multiple meter manufacturers with built-in network communication cards (NICs) that are compatible with its Electric AMI platform. As vendors begin the development and commercialization of next-generation Electric 2.0 Meters and PG&E begins deployment of these meters, the Company plans to utilize a diversified electric meter manufacturing vendor base compatible with its Electric AMI platform and will seek opportunities to

---

60 Reference WP 9-13 to WP 9-16, "Electric AMI Next-Generation Technologies" for more information.

expand its vendor pool to mitigate supplier and market risks. PG&E will closely monitor the Electric AMI marketplace including shifts in regulations, consumer demand, and vendor technology development trends to ensure that the Company's sourcing strategy provides customers with the best value possible while minimizing risks.

E. Cost Forecasts by Major Work Category (MWC) and Estimating Methodologies

1. Expense Forecasts by MWC

PG&E's expense forecast for its Electric AMI Program from 2027-2030 totals $6.8 million as summarized in Table 9-5 below.

TABLE 9-5
EXPENSE BY MWC (NOMINAL DOLLARS IN THOUSANDS)

Line No.	MWC	2027	2028	2029	2030	Total
1	EZ	$2,528	$1,758	$1,719	$841	$6,846

In MWC EZ, PG&E forecasts $2.5 million in expense in 2027, $1.8 million in expense in 2028, $1.7 million in expense in 2029, and $0.8 million in expense in 2030. These expenses include program management activities to implement the Electric AMI program, vendor hosting and maintenance costs for DI app use, and IT related support costs.[61]

2. Capital Expenditures Forecast by MWC

PG&E's capital forecast for its Electric AMI Program from 2027-2030 totals $187.7 million as summarized in Table 9-6 below.

[61] Reference WP 9-37, "Detail Expense Forecast by Major Work Category." PG&E intends to file an Errata with the Commission to add MWC JV (or other appropriate MWCs) and move IT related support costs from MWC EZ to MWC JV.

TABLE 9-6
CAPITAL COSTS BY MWC
(NOMINAL DOLLARS IN THOUSANDS)

Line No.	MWC	2027	2028	2029	2030	Total
1	25	$44,491	$58,514	$50,023	$34,662	$187,690

PG&E forecasts $44.5 million in capital expenditures in 2027, $58.5 million in capital expenditures in 2028, $50.0 million in capital expenditures in 2029, and $34.7 million in capital expenditures in 2030. These capital expenditures include the costs to purchase and install the new electric meters, program management activities to implement the Electric AMI program, vendor licensing costs for the DI apps, and IT and vendor support costs.[62]

F. Conclusion

Based on the information provided above and the associated workpapers, PG&E requests that the Commission approve PG&E's 2027-2030 forecasted costs associated with its Electric AMI Program as presented in this chapter. PG&E's Electric AMI Program will enhance wildfire safety risk mitigation and facilitate the advancement of customer electrification. The strategy of deploying DI app-enabled Electric 2.0 Meters in targeted areas will enhance public safety and energy affordability for customers and support California's environmental, energy, and electrification goals. PG&E's 2027-2030 cost forecasts are reasonable and prudent and should be approved by the Commission.

62 Reference WP 9-38 to WP 9-39, "Detail Capital Expenditure Forecast by Major Work Category." PG&E intends to file an Errata with the Commission to add MWC 2F (or other appropriate MWCs) and move IT related support costs from MWC 25 to MWC 2F.

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 10

CUSTOMER AND ENTERPRISE SOLUTIONS BUSINESS OPERATIONS

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 10
CUSTOMER AND ENTERPRISE SOLUTIONS BUSINESS OPERATIONS

TABLE OF CONTENTS

A. Introduction and Summary 10-1
1. Overview 10-1
2. Summary of Request 10-1
a. Expense 10-3
B. C&ES Business Operations Forecast 10-4
1. Enterprise Lean Office (MWC EZ) 10-4
a. Overview 10-4
b. Forecast 10-5
2. C&ES Business Operations and Strategy (MWC EZ) 10-7
a. Overview 10-7
b. Forecast 10-8
3. Utility Partnerships and Innovation Business Operations (MWC EZ) 10-10
a. Overview 10-10
b. Forecast 10-11
4. C&ES Risk and Compliance (MWC EZ) 10-13
a. Overview 10-13
b. Forecast 10-14
5. C&ES Operational Management (MWC OM) and Operational Support (MWC OS) 10-16
a. Overview 10-16
b. Forecast 10-16
6. UP&I Operational Management (MWC OM) 10-18
a. Overview 10-18
b. Forecast 10-18

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 10
CUSTOMER AND ENTERPRISE SOLUTIONS BUSINESS OPERATIONS

TABLE OF CONTENTS
(CONTINUED)

C. Compliance 10-20

1. Deferred Work Analysis 10-20

D. Conclusion..... 10-22

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 10
CUSTOMER AND ENTERPRISE SOLUTIONS BUSINESS OPERATIONS

A. Introduction and Summary

1. Overview

The purpose of this chapter is to demonstrate Pacific Gas and Electric Company's (PG&E or the Company) expense forecasts for Customer and Enterprise Solutions (C&ES) Business Operations are reasonable and should be approved. C&ES Business Operations includes the following primary functions:

- Enterprise Lean Office ensures the enterprise deployment of PG&E's Lean Operating system, which facilitates continuous improvement and waste elimination at all levels of the company.
- C&ES Business Operations and Strategy drives business performance, strategy and planning for the C&ES functional area, and supports the Office of the Executive Vice President (EVP) and Chief Customer and Enterprise Solutions Officer to deliver safe, high quality customer experiences.
- Utility Partnerships and Innovation (UP&I) Business Operations drives business performance, strategy and planning for the UP&I organization, and supports the Office of the Vice President (VP), UP&I.
- C&ES Risk and Compliance develops risk mitigation strategies and compliance management practices, manages Sarbanes-Oxley controls testing, and provides regulatory proceedings case management support for the C&ES functional area.

C&ES Business Operations' expense forecasts also include Operational Management (OM) costs for the C&ES functional area and UP&I organization, and Operational Support (OS) costs for C&ES.

2. Summary of Request

PG&E requests that the Commission adopt the expense forecasts in Section A.2, Table 10-1. PG&E does not present a 2027-2030 capital expenditures forecast for C&ES Business Operations activities.

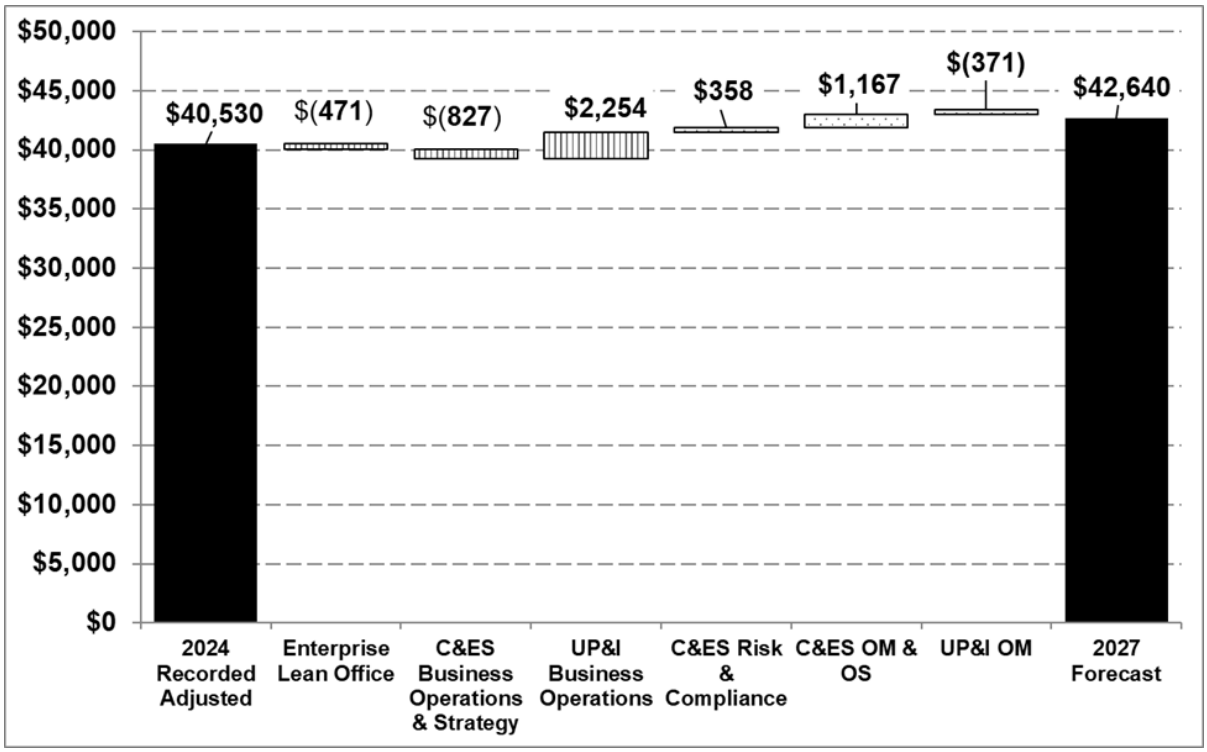
TABLE 10-1
SUMMARY OF EXPENSE
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted 2020	2021	2022	2023	2024	Forecast 2025	2026	2027
1	AB	Misc Expense	–	–	$249	$1	–	–	–	–
2	EZ	Manage Var Cust Care Processes	6,913	9,104	14,088	19,270	27,983	30,103	30,665	29,297
3	OM	Operational Management	2,798	3,289	1,222	4,773	12,154	12,015	12,466	12,933
4	OS	Operational Support	(489)	–	–	221	393	381	396	410
5		Total	$9,222	$12,393	$15,558	$24,265	$40,530	$42,500	$43,527	$42,640

a. Expense

Figure 10-1 provides an expense walk identifying key drivers for the $2.1 million increase in the 2027 forecast of $42.6 million as compared to 2024 recorded adjusted costs of $40.5 million. Each driver is summarized below:

FIGURE 10-1
EXPENSE WALK 2024-2027
(THOUSANDS OF NOMINAL DOLLARS)



The key change drivers in the 2027 expense forecast compared to 2024 Recorded include:

- Enterprise Lean Office: Decrease due to consulting costs related to Lean Maturity;
- C&ES Business Operations: Decrease due to planned headcount changes;
- UP&I Business Operations: Increase due to planned headcount and labor escalation;
- C&ES Risk and Compliance: Increase due to labor escalation;
- C&ES OM and OS: Increase due to labor escalation; and
- UP&I OM: Increase due to labor escalation

B. C&ES Business Operations Forecast

Table 10-2 provides an overview of C&ES Business Operations activities as well as their supporting functions and associated Major Work Category (MWC). PG&E discusses these activities and their forecasts in further detail below.

TABLE 10-2
C&ES BUSINESS OPERATIONS
ACTIVITY, FUNCTION, AND MWC MAPPING

Line No.	Activity	Function	MWC
1	Enterprise Lean Office	Plan Deployment Lean Coaching Assessment and Training	EZ
2	C&ES Business Operations and Strategy	Business Performance Planning and Strategy Office of the EVP Operational Management Operational Support	EZ EZ EZ OM OS
3	UP&I Business Operations	Office of the VP Strategy Alignment & Portfolio Management Business Performance Operational Management	EZ EZ EZ OM
4	C&ES Risk and Compliance	Risk Management Compliance Requirements Management Sarbanes-Oxley Controls Testing Gap Remediation Internal and External Audit Coordination Regulatory Proceedings Case Management Support	EZ

1. Enterprise Lean Office (MWC EZ)

a. Overview

The Enterprise Lean Office is responsible for enterprise deployment of PG&E's Lean Operating system, which facilitates continuous improvement and waste elimination at all levels of the company.

PG&E's Lean Operating System aims to maximize customer quality, delivery, and overall value through:

- Visual management: Being able to see at a glance, how PG&E is performing against the most important metrics across safety, customer, delivery, and quality.
- Employee operating reviews: Brief, focused meetings to identify and address issues and barriers to getting the right work done, meant to involve the people closest to the work in decision-making. These are done daily, weekly and monthly.
- Problem solving: Resolving issues and gap to target trends that impede performance as soon as they are flagged by the people closest to the work
- Standard work: Standardizing effective work processes and best practices so PG&E can continue to improve.
- Waste elimination: Eliminating non-value-added work that exceeds what PG&E's customers are willing to pay for (or what they expect and value from PG&E).

Beyond day-to-day operations, PG&E's Lean Operating System represents a philosophical and cultural change in the way PG&E approaches its work on behalf of customers. Lean drives better decision making, reduces obstacles that coworkers face every day and delivers better outcomes for our customers and stakeholders.

b. Forecast

Table 10-3 below identifies the historical (2020-2024) and forecast (2025-2027) costs for the Enterprise Lean Office. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $0.471 million decrease from 2024 recorded costs, and the customer benefits associated with the forecasted work.

TABLE 10-3
HISTORICAL AND FORECAST COSTS – ENTERPRISE LEAN OFFICE
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	Manage Var Cust Care Processes	$1,203	$4,166	$10,481	$16,615	$23,243	$22,725	$22,350	$22,771
2		Total	$1,203	$4,166	$10,481	$16,615	$23,243	$22,725	$22,350	$22,771

PG&E's 2027 forecast for the Enterprise Lean Office is $0.471 million lower than 2024 recorded costs due to changes to planned Lean maturity work plan.

The 2027 expense forecast for the Enterprise Lean Office was developed using 2024 recorded adjusted costs as a base. These costs were adjusted for escalation, consistent with labor and non-labor escalation rates described in Exhibit (PG&E-8), Chapter 3, and Exhibit (PG&E-10), Chapter 15, respectively. Further adjustments were made to reflect changes to program scope, as described above.

2. C&ES Business Operations and Strategy (MWC EZ)

a. Overview

The C&ES Business Operations and Strategy team is responsible for using the Lean Playbook to drive C&ES business performance, planning and strategy, and provide overall support to the Office of the EVP.

- **Business Performance**: Oversee delivery of C&ES key performance indicators and strategic initiatives using lean visual management and operating review cadence to deliver operational excellence in service of our customers.
- **Budget Adherence**: Oversee financial performance, risks, opportunities, waste elimination projects for C&ES for continued benefits to customers.
- **Planning and Strategy**: Partner with senior leaders and strategic plan owners to advance the C&ES multi-year strategic plan (also known as our True North Strategy - TNS). Drive and coordinate C&ES Business Plan Deployment (BPD) process. BPD activities include alignment of key performance indicators (KPIs), development of balanced and optimized work, resource and financial plan to achieve our KPI outcomes.

Office of the EVP: Chief of Staff activities include Board of Director preparation, internal and external communications, driving cross-functional alignment, problem solving and decision support.

Through these efforts, C&ES Business Operations and Strategy enables the C&ES functional area to deliver safe, high quality customer experiences.

b. Forecast

Table 10-4 below identifies the historical (2020-2024) and forecast (2025-2027) costs for C&ES Business Operations and Strategy. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $0.827 million decrease from 2024 recorded costs, and the customer benefits associated with the forecasted work.

TABLE 10-4
HISTORICAL AND FORECAST COSTS – C&ES BUSINESS OPERATIONS AND STRATEGY
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	Manage Var Cust Care Processes	$1,461	$924	$894	$694	$1,789	$3,556	$3,156	$962
2		Total	$1,461	$924	$894	$694	$1,789	$3,556	$3,156	$962

PG&E's 2027 forecast for C&ES Business Operations and Strategy is $0.827 million lower than 2024 recorded costs due to planned work changes.

The 2027 expense forecast for C&ES Business Operations and Strategy was developed using 2024 recorded adjusted costs as a base. These costs were adjusted for escalation, consistent with labor and non-labor escalation rates described in Exhibit (PG&E-8), Chapter 3, and Exhibit (PG&E-10), Chapter 15, respectively. Further adjustments were made to reflect changes to program scope, as described above.

3. Utility Partnerships and Innovation Business Operations (MWC EZ)

a. Overview

The Utility Partnerships and Innovation (UP&I) team is responsible for developing and implementing innovative solutions for customers to interact with the energy system. This request includes a subset of the UP&I teams that are focused on Business Operations, detailed below.

- **Office of the VP**: The Office of the VP supports the UP&I Vice President through developing materials for internal and external speaking engagements, driving internal alignment on cross cutting issues, and support on problem solving activities.
- **Strategy Alignment & Portfolio Management:** The Strategy Alignment & Portfolio Management team is responsible for ensuring that the UP&I portfolio of work is run efficiently and effectively. Primary activities include driving coordination and alignment for financial planning, key performance indicators and multi-year True North strategies and policies, identifying opportunities for waste elimination, and managing the UP&I portfolio by reviewing cost effectiveness of programs for continued benefits to customers.
- **Business Performance**: The Business Performance team is responsible for supporting initiatives and business processes that cross-cut UP&I teams. Activities include supporting and championing the Lean Playbook, implementing standard processes and procedures, leading annual financial planning processes, implementing a strong

safety culture in UP&I, and leading risk and compliance management activities.

b. Forecast

Table 10-5 below identifies the historical (2020-2024) and forecast (2025-2027) costs for UP&I Business Operations. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $2.3 million increase from 2024 recorded costs, and the customer benefits associated with the forecasted work.

TABLE 10-5
HISTORICAL AND FORECAST COSTS – UP&I BUSINESS OPERATIONS
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	Manage Var Cust Care Processes	$205	$140	$138	$806	$1,375	$2,125	$3,496	$3,629
2		Total	$205	$140	$138	$806	$1,375	$2,125	$3,496	$3,629

PG&E's 2027 forecast for UP&I Business Operations is $2.3 million higher than 2024 recorded costs due to an increase in labor, industry membership and work management tool costs. The Strategy Alignment & Portfolio Management team and the Business Performance team's 2027 forecasted headcount targets are higher than the 2024 recorded actuals due to an anticipated increase in work to efficiently manage the UP&I portfolio. The Strategy Alignment & Portfolio Management team is a newly formed group with the specific purpose of ensuring UP&I is an efficiently managed organization so that all work is aligned and focused on providing maximum benefits to customers.

The 2027 expense forecast for UP&I Business Operations was developed using 2024 recorded adjusted costs as a base. These costs were adjusted for escalation, consistent with the labor and non-labor escalation rates described in Exhibit (PG&E-8), Chapter 3, and Exhibit (PG&E-10), Chapter 15, respectively. Further adjustments were made to reflect changes to program scope, as described above.

4. C&ES Risk and Compliance (MWC EZ)

a. Overview

The Risk and Compliance team supports the business in developing coordinated risk mitigation strategies informed by shared regulatory intelligence and compliance management practices for the Customer and Enterprise Solutions (C&ES) functional area. The team is responsible for the following activities:

- Conducting functional area-wide risk evaluations of identified risks in accordance with PG&E's Enterprise and Operational Risk Management Program standards and tools, and supporting the functional area in the Company's risk identification and risk mitigation processes;
- Maintaining an inventory of CPUC and other state and federal compliance requirements that govern C&ES work processes;
- Managing Sarbanes-Oxley controls testing in accordance with Corporate Accounting guidelines to ensure the accuracy of PG&E's financial statements;

- Conducting gap remediation activities, including control design and implementation;
- Monitoring internal and external audit activity within the organization for the timely and sustainable remediation of any audit findings;
- Developing coordinated implementation strategies to operationalize policy directives and commitments in a cost-efficient and timely manner; and
- Providing case management support, including guidance on cost-recovery mechanisms, data requests, advice letters, and regulatory proceedings, including the General Rate Case and rulemakings related to disconnections, de-energization, demand flexibility, and emergency disaster relief.

Through these efforts, PG&E has the resources and infrastructure to ensure that C&ES is minimizing risk to the business and customers, particularly in areas that impact customer safety and affordability; adhering to legal and regulatory requirements; and maintaining a commitment to meeting ethical standards.

b. Forecast

Table 10-6 below identifies the historical (2020-2024) and forecast (2025-2027) costs for C&ES Risk and Compliance. In the section below, PG&E describes the methodology for its 2027 forecast, the drivers of the $0.4 million increase from 2024 recorded costs, and the customer benefits associated with the forecasted work.

TABLE 10-6
HISTORICAL AND FORECAST COSTS – C&ES RISK AND COMPLIANCE
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	EZ	Manage Var Cust Care Processes	$4,044	$3,874	$2,575	$1,156	$1,576	$1,697	$1,663	$1,934
2		Total	$4,044	$3,874	$2,575	$1,156	$1,576	$1,697	$1,663	$1,934

PG&E's 2027 forecast for C&ES Risk and Compliance is $0.4 million higher than 2024 recorded costs primarily due to escalation consistent with the labor escalation rates described in Exhibit (PG&E-8), Chapter 3. The Risk and Compliance forecast benefits customers by ensuring that C&ES teams understand their regulatory commitments and have appropriate compliance controls in place for work that impacts the customer experience, including billing, metering, rate implementation, credit and collections, communications, outreach, and delivery of income-qualified programs. The Risk and Compliance team also coordinates implementation of requirements that are shared across multiple teams in C&ES and with other functional areas, particularly in areas that impact customer safety and affordability. For example, Risk and Compliance coordinates the implementation of emergency consumer protections to customers impacted by wildfires and other emergencies to ensure that customers receive all required protections and assistance.

5. C&ES Operational Management (MWC OM) and Operational Support (MWC OS)

a. Overview

Operational Management (MWC OM) and Operational Support (MWC OS) represent the costs of non-billable employees who manage, supervise, or support billable PG&E personnel. It also includes the costs for the five Regional Vice Presidents, and administrative staff working for supervisors and managers.

b. Forecast

Table 10-7 below identifies the historical (2020-2024) and forecast (2025-2027) costs for the C&ES functional area.

TABLE 10-7
HISTORICAL AND FORECAST COSTS – C&ES OM AND OS
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	OM	Operational Management	$860	$1,769	$62	$3,775	$10,423	$10,752	$11,156	$11,574
2	OS	Operational Support	(489)	–	–	221	393	381	396	410
3		Total	$371	$1,769	$62	$3,996	$10,816	$11,133	$11,552	$11,984

The 2027 forecast of $12.0 million for MWC OM and MWC OS is a $1.2 million increase over 2024 recorded adjusted cost of $10.8 million. The increase is primarily due to labor escalation. In addition, the 2027 forecast for MWC OM includes the five Regional Vice Presidents (RVPs).[1] The RVPs' labor is recorded in MWC OM as described in the 2023 GRC Exhibit (PG&E-6), Chapter 1A, in order to track the non-billable RVPs' supervision and management costs within the same C&ES organization as the billable personnel they support.

6. UP&I Operational Management (MWC OM)

a. Overview

Operational Management (MWC OM) represents the costs of non-billable employees who manage, supervise, or support billable PG&E personnel in the UP&I organization. It also includes administrative staff working for supervisors and managers.

b. Forecast

Table 10-8 below identifies the historical (2020-2024) and forecast (2025-2027) costs for the UP&I organization.

[1] See Exhibit (PG&E-6), Ch. 2, for a detailed discussion of the RVPs' roles and responsibilities, and their teams' roles, responsibilities and costs.

TABLE 10-8
HISTORICAL AND FORECAST COSTS – UP&I OM
(THOUSAND OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted					Forecast		
			2020	2021	2022	2023	2024	2025	2026	2027
1	OM	Operational Management	$1,938	$1,520	$1,160	$998	$1,730	$1,263	$1,310	$1,359
2		Total	$1,938	$1,520	$1,160	$998	$1,730	$1,263	$1,310	$1,359

The 2027 forecast of $1.3 million for MWC OM is a $0.400 million decrease from 2024 recorded adjusted cost of $1.7 million. The decrease is primarily due to changes in labor costs.

C. Compliance

1. Deferred Work Analysis

The 2023 GRC decision directs PG&E to continue to follow the directives in the 2020 GRC Deferred Work Settlement and to include testimony in this GRC on "deferred work" where the following criteria are met:

1. The work was requested and authorized based on representations that it was needed to provide safe and reliable service (Check 1);
2. PG&E did not perform all of the authorized and funded work, as measured by authorized (explicit or imputed) units of work (Check 2); and
3. PG&E continues to represent that the curtailed work is necessary to provide safe and reliable service (Check 3).

The results from C&ES's review to determine if any work was deferred are summarized in the Deferred Work Analysis Summary workpaper.[2] Each C&ES witness reviewed all the MWCs that are included in their 2027 GRC chapter and answered each of the three questions listed above for determining if work meets the Deferred Work Settlement criteria. The three questions are shown as Check 1, Check 2, and Check 3 in the workpaper. For purposes of the deferred work analysis, Check 2 is divided into two Checks (2a and 2b). The answers to each Check are listed in Columns A through D by MWC. After answering the three deferred work questions, the witness provided the reason that work meets or does not meet the deferred work criteria in Column F.

To analyze whether "the work was requested and authorized based on representations that it was needed to provide safe and reliable service" (Check 1), C&ES answered "Yes" for the following: (1) MWCs activities identified as safety, reliability, or maintenance (SRM)-related in the 2023 Risk Spending Accountability Report (RSAR); and (2) any activities not

[2] See Exhibit (PG&E-6), WP 10-10.

captured in the 2023 RSAR under (1), but some or all of the work was requested in the 2023 GRC based on representations that the work was "needed to provide safe and reliable service."

Next, to analyze whether "PG&E did not perform all of the authorized and funded work, as measured by authorized (explicit or imputed) units of work" (Check 2), C&ES first evaluated whether units were imputed for the work based on the 2023 GRC decision. PG&E then compared PG&E's 2023 and 2024 recorded units and 2025 and 2026 forecasts to the units imputed for the period 2023-2026. Under PG&E's analysis, Check 2 applies where PG&E's 2023 and 2024 actuals and the 2025 and 2026 forecast indicate that the imputed units of work will not be completed by the end of 2026.

Finally, to analyze whether "PG&E continues to represent that the curtailed work is necessary to provide safe and reliable service" (Check 3), PG&E reviewed its 2023 GRC testimony to establish whether it is again proposing the same work for safety and reliability in the 2027 GRC. The response to Check 3 is "No" for work meeting the following conditions:

Demand-Driven Work: Demand-driven work is conducted on an "as-needed" basis. The actual number of units completed depends on the work that materializes during the rate case period, whether there are more or fewer units of work. For example, PG&E completes Natural Gas Appliance Testing (NGAT) following the installation of energy efficiency measures through the Energy Savings Assistance (ESA) Program. The number of NGATs completed is therefore dependent on the volume of work completed in the ESA Program.

Compliance Work: PG&E expects to complete all compliance work regardless of the number of units imputed and forecast. For example, PG&E answers all emergency calls received through the Contact Centers regardless of whether the number of calls received result in costs that vary from its forecasts.

Other: Work is not being requested again for other reasons and work undertaken for safety, integrity and reliability will be achieved with fewer units.

For those areas of work where one or more of the three checks were not met, PG&E determined that the area of work did not qualify as “deferred work” as this term is used in the Deferred Work Settlement. After performing the above analysis, C&ES determined that it is not requesting funding in this GRC for any work meeting the definition of “deferred work” under the Deferred Work Settlement.

D. Conclusion

Based on the evidence discussed above and supporting workpapers, PG&E requests that the Commission grant the requests presented in this chapter for C&ES Business Operations.

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 11

CUSTOMER AND ENTERPRISE SOLUTIONS

TECHNOLOGY VALUE STREAMS

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 11
CUSTOMER AND ENTERPRISE SOLUTIONS
TECHNOLOGY VALUE STREAMS

TABLE OF CONTENTS

A. Introduction and Summary 11-1
1. Overview 11-1
2. Summary of Request 11-3
a. Expense 11-5
b. Capital 11-6
B. C&ES Technology Value Streams Forecast 11-7
1. Customer Experience & Insights Value Stream 11-7
a. Overview 11-7
b. Costs and Forecasts 11-9
2. Rates, Billing & Revenue Value Stream 11-12
a. Overview 11-12
b. Costs and Forecasts 11-13
3. Non-Project Application Enhancements 11-15
a. Overview 11-15
b. Costs and Forecasts 11-15
C. Conclusion 11-16

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 11
CUSTOMER AND ENTERPRISE SOLUTIONS TECHNOLOGY VALUE STREAMS

A. Introduction and Summary

1. Overview

Technology is essential for Pacific Gas and Electric Company (PG&E) to provide customer service and information quickly and accurately. The technology described in this chapter also supports various regulatory directives; see Table 11-1 below. As the technology landscape continues to evolve, it is critical for PG&E to continue investing in technology enabling the Company to meet customers' needs, align with market and industry performance standards, and provide accessibility.

This chapter describes PG&E's expense and capital forecasts for the Information Technology (IT) "value streams" supporting PG&E's Customer and Enterprise Solutions (C&ES) functional area. A value stream is not a discrete program or system—it is a framework for understanding, organizing, and delivering value to PG&E's customers that can include several projects. As explained in Exhibit (PG&E-7), Chapter 7, value streams are akin to sustained, large-scale efforts or investment to deliver technical capabilities for functional areas. Each value stream represents aspects of the Company where technology solutions are of long-term strategic importance and where ongoing investment will consistently deliver improved customer and co-worker experiences leading to increased satisfaction.

PG&E also presents C&ES-related non-project enhancement forecasts that represent smaller, emergent technology investment. These changes are referred to as Non-Project Application Enhancements (NPAE) and typically cost less than $150,000 to implement.

Historically, IT projects have been delivered using the "waterfall" methodology. Waterfall projects are typically delivered in one release after the plan, analyze, design, build, and test phases. As described in Exhibit (PG&E-6) Chapter 5, the Scaled Agile Framework methodology has gained

favor by delivering capabilities in multiple releases, thus overall IT initiatives are broken into smaller pieces and delivered as functionality becomes available. New functions and features are introduced more quickly which creates a faster return on investment. With delivery broken into smaller 'projects,' the minimum capitalization thresholds may not be met, but functionality is implemented without waiting for the full scope of the project to be completed.

In this chapter, PG&E forecasts costs for two IT value streams, each of which are executed by PG&E's IT organization in partnership with the C&ES functional area. These values streams support crucial technology features and capabilities that deliver a positive and seamless customer experience for services, ranging from starting and stopping service to paying bills to helping customers manage their energy usage. PG&E describes each value stream in further detail below:

- Customer Experience & Insights Value Stream: Delivers, maintains and operates technology used to (a) engage and communicate with customers; (b) manage customer information, accounts, and data privacy; and (c) manage and operate customer programs. This allows PG&E to better learn about customer preferences and direct feedback across multiple channels, including after calling the call center or after having scheduled a service. This value stream supports the Customer Service activities described in Exhibit (PG&E-6), Chapter 5. The primary goal of this value stream is to enable and improve customers' interactions with PG&E by improving tools they access through self-service and live-agent experiences.
- Rates, Billing & Revenue Value Stream: Delivers, maintains, and operates customer technology solutions used to (a) deliver gas and electric rates; (b) track customer energy usage and generate bills; and (c) process financial transactions and/or billing exceptions. This allows PG&E to bill customers for services delivered. In addition, this allows PG&E to provide accurate, timely reports on revenue collected from customer bill payments. This value stream also supports the Customer Programs and Billing, Revenue, and Credit activities described in Exhibit (PG&E-6), Chapters 3 and 6, respectively.

In instances when technology work does not require PG&E IT delivery (e.g., when the work is delivered by a vendor specializing in system integration), the costs associated with that work are included in the chapter whose teams are responsible for delivering the solution. For example, PG&E forecasts electrification enhancements in Exhibit (PG&E-6), Chapter 2, and rate tools in Exhibit (PG&E-6), Chapter 3. Moreover, costs to operate and maintain IT systems are included in Exhibit (PG&E-7), Chapter 7.

2. Summary of Request

PG&E requests that the Commission approve the following:

- Adopt the expense forecasts in Section A.2, Table 11-1; and
- Adopt the capital forecasts in Section A.2, Table 11-2.

TABLE 11-1
SUMMARY OF EXPENSE
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted 2020	2021	2022	2023	2024	Forecast 2025	2026	2027	Workpaper Reference
1	JV	Maintain IT Apps & Infra	$11,060	$9,442	$8,487	$7,284	$7,266	$8,269	$9,315	$4,718	WP 11-1
2		Total	$11,060	$9,442	$8,487	$7.284	$7,266	$8,269	$9,315	$4,718	WP 11-1

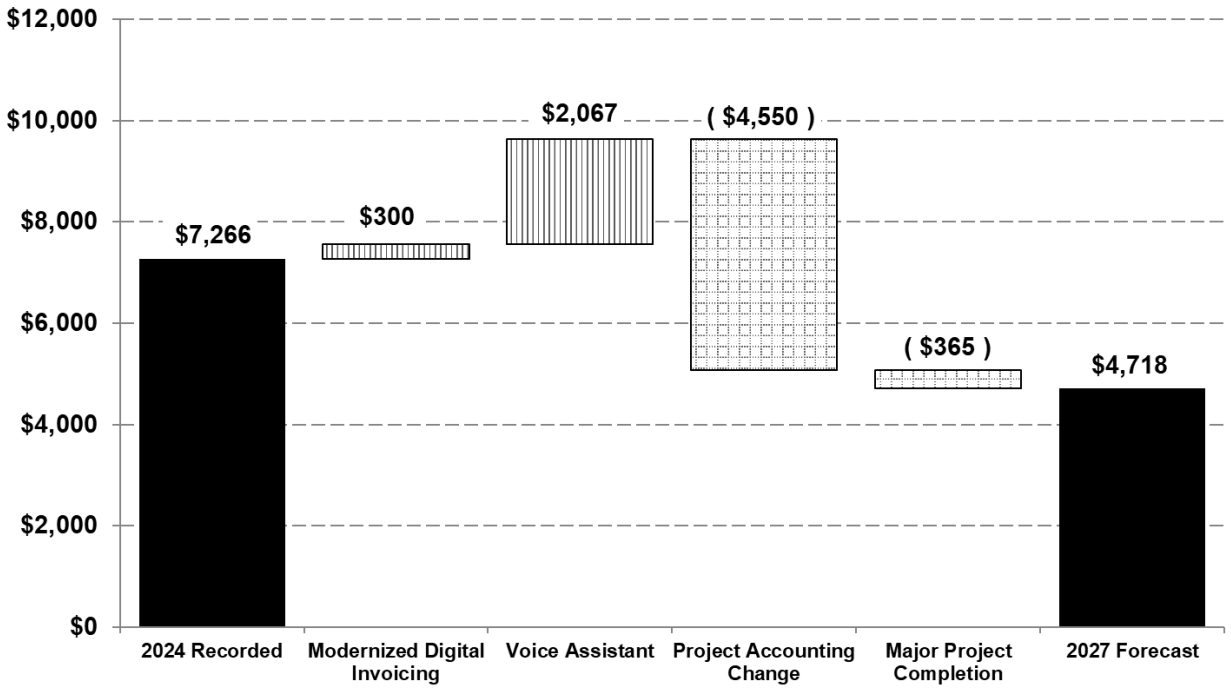
TABLE 11-2
SUMMARY OF CAPITAL
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Description	Recorded Adjusted 2020	2021	2022	2023	2024	Forecast 2025	2026	2027	2028	2029	2030	Workpaper Reference
1	21	Misc Capital	–	$197	$1,291	$6,861	$6,808	$5,505	$2,520	$5,605	$2,645	$2,695	$2,735	WP 11-3
2	2F	Build IT Apps & Infra	$14,850	33,103	44,422	69,033	60,308	39,896	39,236	61,364	63,549	65,399	68,913	WP 11-3
3		Total	$14,850	$33,300	$45,714	$75,893	$67,117	$45,401	$41,756	$66,969	$66,194	$68,094	$71,648	WP 11-3

a. Expense

Figure 11-1 provides an expense walk identifying key drivers for the $2.5 million decrease in the 2027 forecast ($4.7 million) compared to 2024 recorded costs of $7.3 million. Each driver is summarized below.

FIGURE 11-1
C&ES TECHNOLOGY VALUE STREAMS
EXPENSE WALK (2024-2027)
(THOUSAND OF NOMINAL DOLLARS)



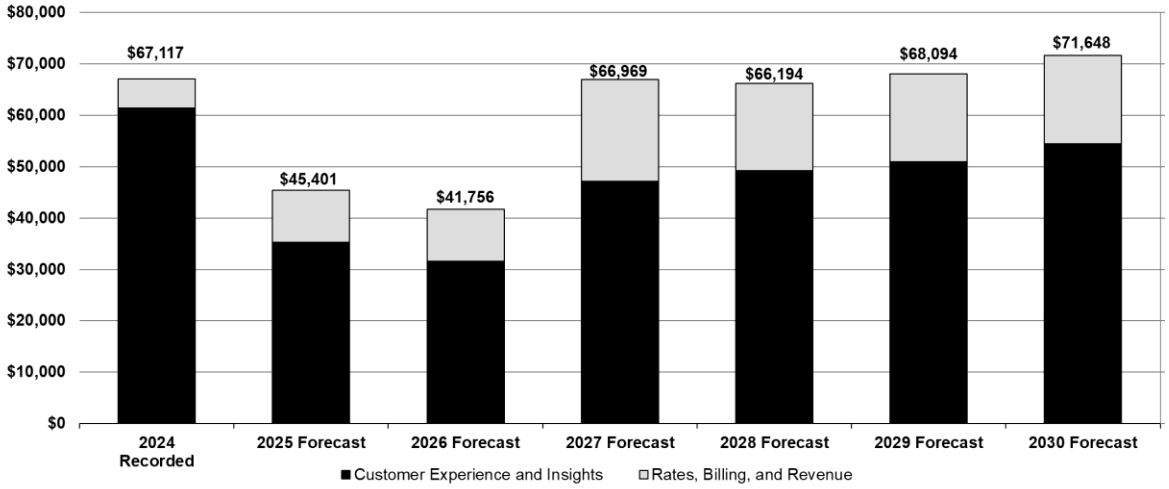
1) PG&E forecasts an increase of $0.3 million in expense costs related to investment in modernizing digital bill presentment and invoicing (further described in section B.2.b below). Additionally, PG&E forecasts an increase of $2.1 million related to per-minute voice assistant call handling through PG&E's Interactive Voice Response (IVR) technology.
2) PG&E forecasts an overall reduction in expense forecasts of $2.5 million. The main driver for the forecast reduction is a change in PG&E accounting practices for project expense forecasts, resulting in a forecast reduction of $4.6 million. As described in

Exhibit (PG&E-7), Chapter 7, current accounting policy for IT hardware and software asset implementations treats some IT costs as expense and others as capital within a given program or project. PG&E plans to treat all IT program and project costs as capital when they are necessary to deploy capital IT assets. Further, previous major project investment, as described in the Customer Experience and Insights value stream section below, will be completed, resulting in a reduction of $0.4 million in forecast.

b. Capital

Figure 11-2 provides a capital walk identifying key drivers for the $0.1 million decrease in the 2027 forecast ($67.0 million) compared to 2024 recorded costs of $67.1 million. Each driver is summarized below.

FIGURE 11-2
C&ES TECHNOLOGY VALUE STREAMS
CAPITAL WALK (2024-2027)
(THOUSAND OF NOMINAL DOLLARS)



1) A $6.1 million increase associated with PG&E's plans discussed in Exhibit (PG&E-7), Chapter 7 to treat all IT program and project costs as capital when they are necessary to deploy capital IT assets.
2) A $6.2 million decrease associated with the completion of major technology re-platform efforts (e.g., PGE.com, Contact Center Service Platform). In 2027, investment in these initiatives shifts to enhancing the capabilities of these platforms to continue supporting a positive and seamless customer experience.

B. C&ES Technology Value Streams Forecast

This section describes the expense and capital forecasts for C&ES Technology value streams, which include the Customer Experience & Insights and Rates, Billing & Revenue value streams.

1. Customer Experience & Insights Value Stream

a. Overview

Customer Experience & Insights delivers, operates and maintains technology solutions used to: (1) engage and communicate with customers, (2) manage customer information, accounts and data privacy, and (3) manage and operate customer programs. In particular, PG&E's 2027 forecast aims to deliver and improve capabilities such as customer self-service management, call center management, customer feedback management, customer data management, web content management and artificial intelligence to deliver improvements in self-service, Customer Satisfaction Scores and Customer Transaction Scores,[1] including capabilities from regulatory directives. These solutions are described below:

[1] Discussed further in Exhibit (PG&E 6), Ch. 5.

TABLE 11-3
ENABLING SOLUTIONS

Line No.	Enabling Solution	Description	Directive Reference
1	Demand Response Management System	Orchestrates core Demand Response (DR) processes, market integration, market bids and dispatch during DR events	D.17-12-003, OPs 10, 15, 19, 23
2	Share My Data 2.0	Secure delivery of electric and gas meter usage and billing data to authorized third parties upon customer approval from the Teradata platform	D.23-09-006, OP 1.a-f.2
3	Wildfire Customer Experience and Insights	Solicit customer feedback to improve PG&E's execution of wildfire response and PSPS events	2023-2025 Wildfire Mitigation Plan, Section 8.4.1
4	Emergency Web Remediation	Highly available and scalable web site for emergency communications for customers, the public and the media	
5	Customer Data Warehouse	Primary system for customer data, meter interval usage, billing data for gas and electric customers used for cancel rebill purposes in CC&B, for delivery to authorized internal resources and external vendors. It is also the source system the Teradata platform uses to apply analytics for business decisions and CPUC reporting and to deliver authorized third party data.	Rule 21, Rule 24 Section C.2.h
6	Customer Revenue and Critical Reporting (CRCR)	Primary technical platform that transforms transactional data from CC&B and SAP to deliver reports to Corporate Accounting, Finance, Regulatory Affairs and the business to measure Billing Operations, Credit and Collections, Workforce Management, Unbilled Revenue, Revenue Reconciliation and Remittance of Taxes and Fees	Sarbanes-Oxley
7	PolyAI – Peggy IVR Voice Bot	Artificial Intelligence enabled voice self-service channel	D.17-05-013, Section 4.2.4.4

PG&E's vision for the future is to create a seamless, integrated ecosystem that is fed from strong, governed data so that customers have consistent experiences in every interaction with the Company whether it be via technology or a live agent.

By investing in real-time data synchronization, building workflow automation, and developing advanced reporting analytics to provide customer experience feedback, PG&E will increase operational efficiency, agility, and improve risk management by quicker identification of outliers or issues. Centralized data and automation will streamline

processes, ensuring timely and consistent responses across channels like e-mail, text, phone, social media and webchat, while enabling PG&E to scale efficiently without sacrificing service quality.

The Company's initiative to provide customer service with a simple, modern, consistent experience requires continued investment in technology across key channels, including Web, IVR and Contact Center Service Platform. The investment allows customers to engage with the Company in the manner of their choosing.

PG&E is investing in PolyAI, a leading provider of voice assistance to call centers to enhance customer service interactions and automate tasks using technologies such as Generative Artificial Intelligence (AI), which learns from data, and utilizes bot assistants to provide personalized engagement, empowering customer self-service ability for transactions such as bill management, energy usage, outages and program enrollment with ease (for example, the Poly AI call-handling referenced in Exhibit (PG&E-6), Chapter 5.)

PG&E remains committed to a value-based and customer-first approach in the design and development of these technologies, continuing to invest in both infrastructure and a simple, modern customer experience. This includes having dedicated teams to further the enhancements of these major technology investments enabling Customer Service driven by customer feedback.[2] To change and adapt technology to customer expectations more quickly, PG&E has worked to improve operational mechanisms that support the rapid release of features and functionality customers are requesting, by developing products (software or web site changes for example) in smaller increments that can be rapidly developed and deployed.

b. Costs and Forecasts

Tables 11-4 (Expense) and 11-5 (Capital) identify the historical (2020-2024) and forecast (2025-2027) costs for the Customer Experience & Insights value stream.

---

2 See Exhibit (PG&E-6), Ch. 5, pp. 5-5 to 5-6.

TABLE 11-4
C&ES TECHNOLOGY VALUE STREAMS
HISTORICAL AND FORECAST EXPENSE – CUSTOMER EXPERIENCE & INSIGHTS VALUE STREAM
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	JV	$5,603	$5,808	$6,274	$4,668	$4,565	$3,512	$4,561	$2,317
2	Total	$5,603	$5,808	$6,274	$4,668	$4,565	$3,512	$4,561	$2,317

TABLE 11-5
C&ES TECHNOLOGY VALUE STREAMS
HISTORICAL AND FORECAST CAPITAL – CUSTOMER EXPERIENCE & INSIGHTS VALUE STREAM
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast					
		2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
1	21	–	$197	$1,291	$6,861	$6,808	$5,505	$2,520	$5,605	$2,645	$2,695	$2,735
2	2F	$2,935	23,250	37,464	63,805	54,608	29,760	29,100	41,516	46,590	48,325	51,719
3	Total	$2,935	$23,447	$38,755	$70,666	$61,416	$35,265	$31,620	$47,121	$49,235	$51,020	$54,454

The 2027 expense forecast of $2.3 million for this value stream represents a $2.3 million (50 percent) decrease from 2024 recorded costs of $4.6 million. This decrease is due to the planned accounting policy change detailed in Exhibit (PG&E-7), Chapter 7, wherein expense activities directly contributing to the delivery of a capital asset will be treated as capital beginning in 2027. The 2027 capital forecast of $47.1 million represents a $14.3 million (23 percent) decrease over 2024 recorded costs of $61.4 million.

Key drivers of forecast spend in the Customer Experience & Insights value stream include:

- PGE.com Maturity: The re-platform of PG&E's website, PGE.com, is planned for completion in Q2 2025. PGE.com is PG&E's primary customer touchpoint, with over 180 million page views per year. Websites require constant updates based on Customer Transaction Score feedback and data. Customer feedback data has highlighted key areas of opportunity, including logging in, understanding the bill and financial assistance offers. With the new platform in place, the

Customer Experience and Insights value stream will continue to make smaller, targeted investments in the website providing improved customer experience.[3]

- Contact Center Service Platform Maturity: PG&E's call centers handled over 6.3 million calls in 2024. The Contact Center Service Platform is utilized by Customer Service Representatives to support customers and provide answers or information. The Platform must be regularly updated to offer new rates[4] as they are implemented, to improve employee and public safety when changes are identified (locked gates, dogs, other situational safety opportunities), and to add functionality not yet available within the Platform agent console. Additional ongoing improvements include:
  - Support for Multi-Factor Authentication (a method to verify a user's sign-on credentials through multiple channels, like a password and text code) on pge.com;
  - Ability to provide bill copies within the agent console;
  - Sending applications (CARE/FERA e.g.) through e-mail;
  - Consolidated solar service; and
  - Net Billing Tariff Implementation support.
- IVR Maturity: PG&E's Interactive Voice Response (IVR) system handles 12 million calls annually, meaning that customers can call and perform transactions without needing to call to a Customer Service Representative. PG&E's IVR requires regular updates to maintain parity with the services offered on the web and by contact center Customer Service Representatives. Artificial intelligence described in Section B.1 above has significantly improved the capabilities of Voice Response and PG&E plans on continued investment in IVR AI capabilities to improve self-service at a lower cost to a Customer Service Agent, improving affordability. Similarly, AI chatbots have become increasingly capable of handling service

---

3 PGE.com is also referenced when discussing Electrification in Exhibit (PG&E-6), Ch. 2, as well as in Exhibit (PG&E-6), Ch. 5.

4 Similar to the discussion in Section B.2, new rates implemented via memorandum accounts are not in this forecast and are tracked separately (e.g., Net Billing Tariff).

requests via text messaging and chat channels which is another area Customer Experience and Insights value stream supports.

- Outage Response: Outage response is critical for both public safety and customer satisfaction. PG&E plans to continue improving outage notification for planned and unplanned outages and optimizing the customer's experience during outages.
- Voice of the Customer Maturity: PG&E uses technology to collect, categorize, and act on customer feedback and insights. PG&E will continue to invest in technology that will make it easier for customers to provide feedback and enable PG&E to implement changes to better serve customers.

2. Rates, Billing & Revenue Value Stream

a. Overview

The Rates, Billing & Revenue value stream delivers, operates and maintains technology solutions used to: (1) maintain and build new gas and electric rates, (2) track customer energy usage and generate bills, and (3) process financial transactions and/or billing exceptions. In particular, PG&E is requesting costs to deliver capabilities such as: billing management, customer data management, customer program management, master data management, data analysis, data and information architecture, data capture, relational data storage, application delivery, client operating system, and backup and recovery and analytic applications. These capabilities deliver critical system availability and improve Customer Satisfaction Scores and Customer Transaction Scores.

Additionally, as California transitions to energy systems of the future, this value stream will deliver improvements to technology systems that will enable customers to take advantage of rates and programs that serve their needs. Recent years have seen the proliferation of Net Energy Metering and related customer generation technologies, and technologies and programs will continue to evolve. For example, the introduction of EV Submetering requires the measurement of usage specific to the charging of an Electric Vehicle

separately from the non-EV usage. The billing system will require flexibility to segregate the usage between EV and non-EV, assign the correct usage across the respective accounts, and apply the appropriate billing values for EV and non-EV rates. Further, as PG&E continues to implement Distributed Energy Resources (DER) across the service territory, capabilities may be required to segment customer charges based on the reality of how PG&E serves customer demand. As newer technologies and programs emerge with the energy transition, the capabilities from this value stream will evolve as well, enabling access to and management of customer energy usage and generation, bill and payment control, and efficient deployment of new rates and program services.

b. Costs and Forecasts

Tables 11-6 (Expense) and 11-7 (Capital) identify the historical (2020-2024) and forecast (2025-2027) costs for the Rates, Billing & Revenue value stream.

TABLE 11-6
C&ES TECHNOLOGY VALUE STREAMS
HISTORICAL AND FORECAST EXPENSE – RATES, BILLING, & REVENUE VALUE STREAM
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	JV	$1,175	$807	$531	$1	$669	$2,650	$2,650	$300
2	Total	$1,175	$807	$531	$1	$669	$2,650	$2,650	$300

TABLE 11-7
C&ES TECHNOLOGY VALUE STREAMS
HISTORICAL AND FORECAST CAPITAL – RATES, BILLING, & REVENUE VALUE STREAM
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast					
		2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
1	2F	$11,915	$9,853	$6,958	$5,228	$5,700	$10,136	$10,136	$19,848	$16,959	$17,074	$17,193
2	Total	$11,915	$9,853	$6,958	$5,228	$5,700	$10,136	$10,136	$19,848	$16,959	$17,074	$17,193

The 2027 expense forecast of $0.3 million for this value stream represents a $0.4 million decrease over 2024 recorded costs of

$0.7 million. This decrease is due to the planned accounting policy change detailed in Exhibit 7, Chapter 7, wherein expense activities directly contributing to the delivery of a capital asset will be treated as capital beginning in 2027. The 2027 capital forecast of $16.8 million represents a $14.8 million increase over base year 2024 recorded.

Key drivers of forecast spend in the Rates, Billing & Revenue value stream include the ongoing implementation of rates and investment in modernized digital invoicing. PG&E notes that it is currently implementing new rate functionality that was unknown, and therefore not forecasted, during 2023 GRC. PG&E has received approval to track costs to various memorandum accounts for these projects, resulting in a reduction in GRC recorded actuals.[5] Further, regarding rates, there are proceedings with existing decisions and proceedings underway or not yet established, which have resulted or are expected to result in GRC-funded rate project directives that need to be implemented in the 2027 GRC cycle. This GRC forecast assumes a level of GRC-funding for rate projects that reflects GRC recorded costs over the past several years. If any rate design proceeding (such as the 2023 GRC Phase II, decision expected Q4, 2026) results in currently unknown directives that exceed the assumptions used here for the 2027 forecast, PG&E may seek authorization to track these costs in the appropriate memorandum accounts for later recovery.

It is worth noting that the costs for Rate Tools are not included in the tables above. These are defined and captured in Exhibit 6, Chapter 3, Customer Programs.

---

5 PG&E has been authorized to record costs to Memorandum Accounts for several rate projects that were not known or planned for in the 2023 GRC Phase I, including the Net Billing Tariff (Net Billing Tariff Memorandum Account), the Base Services Charge, previously known as the Income Graduated Fixed Charge (Fixed Charge Memorandum Account) and the RTP Expanded Pilots (Dynamic and Real Time Pricing Memorandum Account). At this time, PG&E plans to continue recording any costs related to these projects through the 2027-2031 GRC Cycle to these already established memorandum accounts.

3. Non-Project Application Enhancements

a. Overview

PG&E's Functional Areas regularly request minor changes to business applications to meet new process or compliance requirements, optimize workflows, or otherwise address emerging business needs. These requests can require IT developers to create or modify database fields, add or remove options from a user interface, tweak report views, update dataflows or workflow logic, and more. These enhancements are typically small enough that they can be completed in a few days to a few weeks, such that they do not require the same level of coordination and oversight as a full project. Costs in this chapter include such Non-Project Application Enhancements (NPAE) associated with Customer and Enterprise Solutions applications

b. Costs and Forecasts

Table 11-8 identifies the historical (2020-2024) and forecast (2025-2027) expense costs for C&ES non-project application enhancements.

TABLE 11-8
C&ES TECHNOLOGY VALUE STREAMS
HISTORICAL AND FORECAST EXPENSE – NPAE
(THOUSANDS OF NOMINAL DOLLARS)

Line No.	MWC	Recorded Adjusted					Forecast		
		2020	2021	2022	2023	2024	2025	2026	2027
1	JV	$4,282	$2,827	$1,682	$2,615	$2,032	$2,107	$2,104	$2,101
2	Total	$4,282	$2,827	$1,682	$2,615	$2,032	$2,107	$2,104	$2,101

The 2027 expense forecast of $2.1 million for these enhancements represents a $0.1 million (5 percent) increase over 2024 recorded costs of $2.0 million. PG&E's use of 2024 recorded costs as a starting point for its 2027 forecast aligns with recorded costs for NPAEs since 2021 and its 2027 forecast reflects a negligible increase associated with escalation. PG&E anticipates that NPAE work in 2027 will be primarily focused on website and Contact Center applications as the re-platform efforts are completed. This work benefits customers because it enables

PG&E to be nimble in implementing minor technology modifications that support a smooth and positive customer experience via customer-facing and back-end platforms. In the absence of this funding, PG&E would be constrained in its ability to implement new functionality that is requested by customers, system updates that promote more efficient workflows between systems and teams, and modifications needed to support compliance requirements that are not funded by a separate cost recovery mechanism (e.g., a separate application or a balancing or memorandum account).

C. Conclusion

Based on the evidence discussed above and the associated attachments and workpapers, PG&E requests that the Commission grant the requests presented in this chapter for C&ES Technology Value Streams.

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 12

MOBILE HOME PARK UTILITY UPGRADE PROGRAM

(PG&E-6)

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 12
MOBILE HOME PARK UTILITY UPGRADE PROGRAM

TABLE OF CONTENTS

A. Introduction 12-1

1. Summary of Attachments Supporting This Chapter 12-1

B. Summary of Costs 12-1

C. Standard of Review for Reasonableness 12-2

D. Procedural History 12-3

E. Balancing Account and Uncertainty of Project Costs 12-5

F. Selection of Contractors 12-7

G. Organizational and Project Management Structure 12-8

H. Ongoing Efforts to Minimize Costs 12-9

1. Contract Resources 12-9

2. Project Management, Monitoring, and Control 12-9

3. Cost Review 12-9

4. Project Close-Out 12-10

5. Program Monitoring 12-10

6. Policies and Procedures 12-10

7. Communication and Guidance 12-11

8. Continuous Improvement 12-11

I. Safety Enhancements 12-12

J. Cost Table as Reported in February 2024 Annual Report 12-13

1. Explanation of Cost Categories 12-15

K. Conclusion 12-15

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 12
MOBILE HOME PARK UTILITY UPGRADE PROGRAM

A. Introduction

This chapter demonstrates the reasonableness of the Pacific Gas and Electric Company's (PG&E or the Company) costs incurred to execute the Mobile Home Park (MHP) Conversion Program (MHP Program) for projects completed between January 1, 2021, and December 31, 2024. In accordance with Ordering Paragraph (OP) 8 of Decision (D).14-03-021, this chapter serves as the reasonableness review for the costs incurred for those program activities. PG&E is not seeking cost recovery nor presenting a forecast for the MHP Program in the General Rate Case (GRC) as the costs incurred for these projects have been recovered through the electric and gas Mobile Home Park Balancing Accounts (MHPBA).

The MHP Program began as a voluntary three-year pilot program (from 2015-2017) to upgrade a portion of California's eligible MHP residential units to direct utility service. Many MHPs built in California before 1997 received electricity or natural gas from the local utility under a master-metered configuration through the MHP owner or operator, who then distribute utilities to sub-metered individual coaches or homes. The MHP Program seeks to replace these privately-owned distribution systems to improve safety and reliability. With the issuance of D.20-04-004, the California Public Utilities Commission (Commission or CPUC) established the current 10-year MHP Utility Conversion Program.

1. Summary of Attachments Supporting This Chapter

There are two attachments to this chapter: (1) Attachment A is the 2024 Annual Report to the CPUC for PG&E's Mobile Home Park Utility Upgrade Program;(2) Attachment B is the Mobile Home Park Utility Upgrade Program, Supplemental Individual Project and Cost Information for projects completed between January 1, 2021 and December 31, 2024.

B. Summary of Costs

As shown in Table 12-1 below, PG&E incurred $214.31 million ($212.03 million of capital expenditures and $2.3 million of expense costs) for

projects completed by year-end 2024 in executing the ongoing MHP Program.[1,2]

TABLE 12-1
CAPITAL AND EXPENSE MOBILE HOME PARK (MHP) UTILITY
2021 THROUGH 2024 FOR COMPLETED PROJECTS
(MILLIONS OF DOLLARS)

Line No.	MHP Program	Electric Cost Incurred for Completed Projects	Gas Cost Incurred for Completed Projects	Total
1	Capital	$103.35	$108.68	$212.03
2	Expense	1.5	0.78	2.3
3	Total	$104.84	$109.47	$214.31

Table 12-1 shows costs incurred for 58 completed projects through December 2024. These 58 projects cover 6,142 spaces (or five percent) of approximately 105,318 spaces within PG&E's service territory designated by the Commission for service upgrade through the MHP program in D.20-04-004.[3] As discussed below, the costs incurred for completion of these projects are reasonable and justified because: (1) the work performed under the MHP Program was mandated by the Commission; and (2) PG&E has performed the work consistent with the Commission's directives in D.14-03-021 to improve safety and reliability.

C. Standard of Review for Reasonableness

In San Diego Gas & Electric Company's Application (A.) 12-12-016, the Commission described reasonableness review for its MHP Program. The standard of proof to be applied by the Commission in an after-the-fact reasonableness review is preponderance of the evidence.[4] Preponderance of

---

1 The $214.31 million presented here pertains to 58 MHPs that completed conversion between January 1, 2021 and December 31, 2024. Other costs incurred for projects currently in progress will be presented for reasonableness review in subsequent GRCs as those projects are completed. These are projects reported as financially closed.

2 See Table 12-2 below for additional cost information.

3 D.20-04-004, Appendix B, Evaluation of 2015-2018 Mobile Home Park (MHP) Utility Conversion Pilot Program Revision of January 2020, p. 14.

4 *Assigned Commissioner and Administrative Law Judges' Scoping Memo and Ruling* (Apr. 1, 2015) A.14-12-016, p. 5; see also D.14-06-007, p. 13.

the evidence is defined "in terms of probability of truth, e.g., 'such evidence as, when weighed with that opposed to it, has more convincing force and the greater probability of truth."[5] As such, PG&E must present more evidence that supports the requested result than an alternative result.

As part of the assessment for reasonableness of costs incurred, the Commission applies a reasonable manager standard where the utilities "should comport with what a reasonable manager of sufficient education, training, experience and skills using the tools and knowledge at his disposal would do when faced with a need to make a decision and act,"[6] and "are held to a standard of reasonableness based upon the facts that are known or should be known at the time"[7] where "action taken should logically be expected, at the time the decision is made, to accomplish the desired result at the lowest reasonable cost consistent with good utility practices."[8]

The Commission has clarified that:

> …reasonable and prudent acts do not require perfect foresight or optimum outcomes, but may fall within a spectrum of possible acts consistent with utility needs, ratepayer interests, and regulatory requirements.[9]
>
> A decision may be found to be reasonable and prudent if the utility shows that its decision making process was sound, that its managers considered a range of possible options in light of information that was or should have been available to them, and that its managers decided on a course of action that fell within the bounds of reasonableness, even if it turns out not to have led to the best possible outcome.[10]

D. Procedural History

R.11-02-018 was initiated to:

> …examine what the Commission can and should do to encourage the replacement by direct utility service of the master-meter/submeter systems that supply electricity, natural gas, or both to mobile home parks and

---

5 D.14-06-007, p.13, and D.08-12-058, p. 19.

6 D.90-09-088, p. 16.

7 D.90-09-088, p. 15.

8 D.90-09-088, p. 16.

9 D.97-08-055, p. 54.

10 D.89-02-074, p. 169, Conclusion of Law 3.

manufactured housing communities located within the franchise areas of electric and/or natural gas corporations.[11]

The rulemaking "grapple[d] with issues that have proven intractable for decades"[12] and, "[a]fter three years of review, we [the Commission] approve[d] a three-year pilot program to incentivize voluntary conversions"[13] known as the MHP Pilot Program. These conversions are required to be completed on a "to-the-meter" (TTM) and "beyond-the-meter" (BTM) basis.[14]

The scope of the approved MHP Program is to convert master-metered/sub-metered natural gas and/or electric services to direct utility services for approximately 10 percent of spaces in MHPs and manufactured housing communities (collectively, MHPs) within each utility's service territory where the "[c]riteria for conversion must focus on safety first and then, on reliability and capacity improvements."[15]

As the MHP Program is a Commission-mandated safety and reliability program, the Commission stated the following regarding cost recovery:

> Utilities will be authorized to fully recover the reasonably incurred, actual costs of the conversion program in distribution rates. Reasonable incremental expenses for program development and administration, not otherwise recovered in rates, should be entered as incurred for annual recovery in the utility's pilot program balancing account. Reasonable expenditures for actual construction costs should be entered as incurred and recovered in the year following cut over to direct utility service. "To the meter" construction costs will be capitalized at the utility's then current authorized rate of return on rate base, based on actual (not forecast) expenditures. 'Beyond the meter' construction costs also will be capitalized based on actual (not forecast) expenditures but, consistent with their status

---

11 *Decision Granting Petition in Part and Instituting Rulemaking Into Issues Concerning Transfer of Electric and Natural Gas Master-Metered Service at Mobilehome Parks and Manufactured Housing Communities to Direct Service by Electric and/or Natural Gas Corporations*, (OIR) R.11-02-018 (Issued Feb. 25, 2011), p. 1.

12 D.14-03-021, p. 3. The Commission also discussed efforts commenced in the 1990s to encourage California MHPs with master-metered service to convert to direct utility service, noting that over a period of 17 years little more than two dozen conversions occurred. *Id.*, p. 4-5.

13 D.14-03-021, p. 2.

14 D.14-03-021, p. 75, OP 2.

15 D.14-03-021, p. 3.

as a regulatory asset, will be amortized over ten years at the utility's then-current authorized return on rate base.[16]

The Commission also requires that each electric and/or gas corporation must annually prepare a report for the conversion program approved in OP 2.[17]

In addition, the reasonableness of costs incurred from the program is to be reviewed by the Commission in an after-the-fact reasonableness review:

> Each electric and/or gas corporation is authorized to fully recover in distribution rates the costs of the conversion program approved in Ordering Paragraph 2, subject to reasonableness review. The following ratemaking is approved: actual, prudently incurred program costs shall be entered in a balancing account for recovery in the first year following cut over of service; 'to the meter' construction costs must be capitalized based on actual (not forecast) expenditures at the utility's then -current authorized return on rate base; 'beyond the meter' construction costs must be capitalized based on actual (not forecast) expenditures and consistent with their status as a regulatory asset, these costs must be amortized over ten years at a rate equivalent to the utility's then -current authorized return on rate base. Review for reasonableness of 'to the meter' costs will occur in the general rate case where those costs are put into rate base. Review for reasonableness of 'beyond the meter' costs will occur in the first general rate case after service cut over.[18]

E. Balancing Account and Uncertainty of Project Costs

The Commission has recognized that:

> …[t]he numerous uncertainties that underlie the parties' construction cost estimates and the lack of record based-specificity on the administrative functions and associated costs necessary to implement a pilot MHP conversion program, makes forecast ratemaking particularly speculative.[19]

Therefore, a two-way balancing account was established to allow the utilities to recover costs that were reasonably incurred for executing the program instead of the use of forecast ratemaking as:

> …[t]he estimates for conversion of SLRH [San Luis Rey Homes, Inc.] may or may not prove to accurately reflect actual construction costs at that MHP; moreover, they may or may not be a very accurate proxy for other MHPs.[20]

---

16 D.14-03-021, p. 3.

17 D.14-03-021, p. 78, OP 10.

18 D.14-03-021, p. 77, OP 8.

19 D.14-03-021, p. 69, Finding of Fact 35.

20 D.14-03-021, p. 49.

The electric and gas Mobile Home Park Balancing Accounts were established per Advice Letter 3473-G/4415 on May 9, 2014.

The uncertainty of project costs was borne out through the project implementation. In R.11-02-018, the Commission used the SLRH MHP as a sample park. The SLRH was not ultimately representative of the MHPs selected and prioritized by the Commission's Safety and Enforcement Division (SED) for PG&E's MHP Program, which included parks with less than ideal construction conditions being addressed first. Based on the SLRH sample project, PG&E provided an estimate for the construction portion of the conversions (Common Case Cost Estimate) of $23,001 per space in 2012.[21] For the 58 MHP conversions combined, PG&E incurred costs within 5 percent of the Common Case Cost Estimate with escalation for the construction portion of the work performed while other costs (such as Program Management Office, estimating and design) were purposefully excluded from the Common Case Cost Estimate.

Based on the experience from projects completed to date, projects often differed from the SLRH sample park in several respects, which affected total project cost including:

- Some project sites are near waterways or below sea level, which makes water management for sub structure installation challenging and labor intensive.
- Many MHPs have unique layouts where an efficient design was not always achievable. For example, the layout of some MHPs did not support providing services from both sides of the main and the program had to install additional footage to convert the mobile homes to direct utility service. In addition, spaces between each MHP can be vastly different, and, as a result, increase the footage of trench needed to complete the conversion. Mobile home parks with unique designs that differed from those forecasted in the original case exhibits occurred more frequently, resulting in the program incurring a higher cost per space due to additional trenching needed to install gas and electric services.
- Many projects had subsurface conflicts (i.e., unmarked abandoned or privately owned utilities) located in areas where the program intended to

[21] D.14-03-021, Appendix B.

install the new infrastructure. These subsurface conflicts were not easily detected during the design stages and were uncovered during the construction excavation stage.

- The geographic locations of some MHPs are rural where transportation and material delivery for the projects are more time consuming and costly.
- The linear footage per space is also relatively larger at MHPs located in rural areas. As the geographic footprint of the MHPs are much larger, the spaces between mobile homes are greater, which drove higher costs.

PG&E provides additional information about specific project costs, project characteristics, and execution challenges for each of the 58 MHP conversions completed in Attachment B.

F. Selection of Contractors

The Commission ordered utilities to perform the program work or otherwise select licensed contractors to do so, as follows:

> Each utility will perform or select a qualified, licensed contractor to perform all necessary 'to-the-meter' [TTM] construction, plumbing and/or electrical work. Each MHP owner, in consultation and coordination with the utility, will select a qualified, licensed contractor to perform all necessary 'beyond-the-meter' [BTM] construction, plumbing and/or electrical work…The utility will reimburse the MHP owner for all prudently occurred and reasonable 'beyond-the-meter' construction expenditures, which shall not include any modification or retrofit of the coach or manufactured home.[22]

PG&E conducted a Request for Information (RFI) in 2022 to develop a list of qualified vendors and references for BTM cost. BTM costs include work related to the connection from the utility meters to the mobile home. The work is performed by qualified contractors selected by the MHP owner. They are not directly managed by PG&E. If the MHP owner selects a vendor that is not part of PG&E's list of qualified vendors, PG&E will then validate if the selected BTM vendor has a valid contractor's license. Upon completion of the BTM construction, PG&E reviews all BTM costs submitted for reimbursement. If the cost submitted for reimbursement is beyond the reference cost developed through the RFI at the beginning of the program, PG&E will then request that the

[22] D.14-03-021, pp. 47-48.

SED review and approve the cost prior to continuing the program with the MHP Owner.

The to-the-meter costs recorded include costs for utility and contracted services. Utility labor includes meter set-up, engineering design reviews, gas, and electric service turn-ons, and the removal of the master meter. Contracted services include construction inspection, engineering services, material procurement, construction services, Program Management Office (PMO) and project management services.

G. Organizational and Project Management Structure

PG&E's MHP Program utilizes an Engineering, Procurement, and Construction (EPC) contracting model to execute the work with an organizational structure of four main workstreams (PMO, Engineering Design, Project Execution and Construction Inspection) with support from matrixed organizations (Customer Outreach, Land and Environmental). The EPC model was chosen due to resource flexibility, and to mitigate risk by leveraging industry resources.

The PMO is responsible for maintaining the project schedules, cost reporting, program standards and controls.

The Engineering Design team is responsible for reviewing and providing feedback to the various vendors to ensure that the design of each project meets PG&E standards. Once the designs are approved, the vendors will develop the construction scope of work with pricing that will be reviewed by the Project Execution team prior to construction.

The Project Execution team consists of project managers and project engineers that manage the scope, schedule, and cost of the MHP Program. After receiving the scope of work, the Project Execution team monitors and controls the project through completion, including ensuring invoice accuracy. Although PG&E does not manage the BTM work, the Project Execution team is responsible for coordinating the interconnection activities with the new PG&E system and reviewing the BTM vendor's pricing to ensure costs incurred for BTM work are aligned with bids received through the completed RFIs.

The Construction Inspection team is responsible for the inspection and assessment of construction work performed by various vendors, coordination of clearances to tie in the new assets, and review of construction documents.

H. Ongoing Efforts to Minimize Costs

In this section PG&E describes its ongoing efforts to minimize the costs of the MHP Program.

1. Contract Resources

With PG&E leveraging an EPC contracting model, contract costs for services and materials are about 90 percent of the program cost. As contract resources are an important aspect to the prudent execution of the MHP Program, retaining capable contractors and vendors at reasonable rates is one of the main focuses of the program. To control program costs through pre-negotiated rates, PG&E conducted in 2022 multiple rounds of competitive solicitations for TTM construction activities within its service territory to identify and select qualified and licensed construction contractors. Contractors known to perform the scope of work for MHP projects were selected by an experienced team of Program/Project management and Sourcing employees. PG&E conducted multiple Request for Proposals (RFP) throughout the program. PG&E invited 10 contractors to participate in the 2022 RFPs and a total of five contractors submitted proposals for consideration.

2. Project Management, Monitoring, and Control

PG&E's MHP Project Management and Inspection team oversees TTM construction activities to confirm that work is safely performed in accordance with PG&E standards, project scope, schedule, and budget. Each project is assigned a project manager, a gas inspector (when gas assets are installed) and/or an electric inspector (when electric assets are installed) who are responsible for reviewing and assessing the activities of the TTM contractor. At the beginning of each project, the project manager holds a pre-construction meeting with follow-up weekly meetings with the selected TTM contractor to review project details, reporting, safety, and other deliverables.

3. Cost Review

PG&E tracks the costs of construction for each project using the Earned Value methodology which recognizes the value of the project based on monitoring the project plan, completed work and value of completed

milestones to monitor if a project is on track. The Earned Value methodology was chosen based on project management best practices. Costs in excess of estimates require further review and approvals through reauthorization. Upon invoicing for TTM and BTM work, documentation is required and is reviewed by the program's project management and inspection group to validate that completed work was in scope and done in accordance with contractual agreements at the negotiated rates and budget.

4. Project Close-Out

PG&E performs reconciliation and quality assurance following completion of every project to confirm that:

a) Records in support of both program and project compliance are reviewed;
b) Oversight is provided for project decisions and/or associated changes that occurred;
c) Documents are stored in centralized repositories for proper records management; and
d) Total project financial records are reviewed for validity and compared against estimates when final costs have been recorded.

5. Program Monitoring

PG&E produces routine financial and schedule reports for its management teams to allow continuous oversight over the program, to monitor project progress, and to identify the risks and issues impacting schedule and costs.

6. Policies and Procedures

PG&E established a Change Control Board (CCB), which is held regularly, where team members can propose changes (such as where efficiencies can be gained on the program). PG&E also established a Program Management Plan (PMP) which is used to document the MHP Program's guidelines and core processes and to facilitate uniformity of repeatable processes. The PMP and supporting documentation are periodically modified and updated to reflect lessons learned through MHP Program activities and changes from the Change Control Board.

7. Communication and Guidance

PG&E fosters open channels of communication with external program stakeholders, including the Commission's SED, the California Department of Housing and Community Development, and other utilities as well as local and state entities to promote awareness of the program. The MHP Program team shares observations and findings, seeks guidance, and provides information to better coordinate activities such as inspections.

8. Continuous Improvement

PG&E continually evaluates and implements improvements to its MHP Program processes. Though not exhaustive, the following are examples of continuous improvements applied through program implementation:

- Organizational alignment changes to improve planning and estimation of individual projects;
- Changed meter locations to the front of mobile homes when possible to reduce trenching and restoration lengths;
- Implementing gas stubs for vacant spaces not in use when possible so as to reduce trenching, restoration, and idle gas risers.
- Driving continuous improvements in value engineering and constructability walks to minimize scope changes and enhance on-site efficiency;
- Introduced mobile as-built documentation to improve record accuracy and reduce administrative burden; developed and implemented improved safety procedures for pre-construction activities, focusing on the identification and management of unmapped privately owned utilities. This initiative included enhanced site surveys, advanced detection technologies, and collaborative efforts with MHP owners and EPC Vendors to minimize risks and ensure a safer work environment for all personnel involved;
- Meet with partner utilities to share lessons learned, schedules on joint projects and program level risks;
- Conduct monthly reviews with all contractors to share lessons learned and best practices;
- Require EPC vendors to procure materials from the lowest cost qualified vendor; and

- Review PG&E internal standards from various organizations and make changes as appropriate.

Through ongoing efforts to improve existing processes and the implementation of these changes, the efficiency and cost-effectiveness of future MHP Program projects are also improved.

In addition to these ongoing efforts to minimize costs, PG&E has also adopted a new metric, Cost per Foot, to benchmark the costs of the MHP projects with other PG&E internal projects. As Cost per Space was frequently used during the pilot phase of the program, PG&E found that Cost per Space was difficult to benchmark with other internal and external projects due to difference in scope, cost structures of various organizations and standards (such as cross bore prevention standards and environmental stewardship standards) that are applied to the projects.

I. Safety Enhancements

With criteria for conversion focusing on safety first, PG&E has performed gas leak surveys as a safety measure to ensure PG&E is not exposing the public, contractors, or PG&E employees to mitigatable risk via natural gas ignition on the owner's legacy system. As of December 31, 2024, PG&E found 1,282[23] leaks on customer owned-facilities in 191 MHPs that serve almost 16,497 sub metered tenants by using state-of-the-art-methane leak detection instruments. As many of these facilities have since been decommissioned and replaced with direct utility services that are in compliance with current codes and standards (General Order (GO) 128, GO 95, GO 112 and applicable National Electrical Codes), the MHP Program has furthered the goal of delivering safe, reliable utility services to the mobile home park residents.

In addition to mitigating gas leaks, the MHP Program also provided many other safety enhancements to the mobile home park residents and community. Some of the benefits include:

- Reduction of greenhouse gases associated with gas leaks;
- Decommissioning of old transformers that may contain environmental contaminating substances;

[23] The number of leaks found through leak surveys include MHPs that are yet to be completed.

- New utilities installed under the program are now included into GO 165 and 112 maintenance programs;
- Mobile home park residents at converted MHPs can now utilize more modern appliances, especially for residents located in areas more sensitive to extreme temperature conditions;
- New gas lines, installed to meet appropriate depth and clearance requirements, do not traverse under mobile homes and other structures; and
- Mobile home residents at converted MHPs have access to PG&E's field services that will respond to operational and maintenance issues such as outages and gas leaks.

J. Cost Table as Reported in February 2024 Annual Report

Per D.14-03-021, PG&E files annual reports for the MHP Program. PG&E's tenth annual report, filed in February 2025, covers the costs on projects completed to date, including the 58 completed MHP projects discussed in this chapter.[24] The 2024 report summarizes the Program's findings such as the program timeline, progress and cost. The costs from the 2024 report are presented below in Table 12-2.

[24] See Attachment B.

TABLE 12-2
MHP PROGRAM COSTS JANUARY 1, 2021 THROUGH DECEMBER 31, 2024

Line No.	Item	Cost
1	TTM Contractor Costs	
2	Civil/Trenching	$72,027,904
3	Electric System	
4	Labor	18,562,261
5	Material/Structure	8,569,504
6	Gas System	
7	Labor	13,831,262
8	Material/Structure	3,993,894
9	Subtotal TTM Contractor Costs	$116,984,826
10	TTM Costs for Utility Crews Supporting Program	
11	Labor	$4,221,102
12	Materials Purchasing, Warehouse	297,9606
13	Subtotal TTM Utility Crew Costs	$4,519,062
14	Other Non-Labor Costs	$13,170,070
15	Property Taxes	–
16	AFUDC	6,690,489
17	Subtotal Other TTM Non-Labor Costs	$19,860,558
18	Subtotal TTM Costs	$141,364,446
19	BTM Contractor Costs	
20	Civil/Trenching	–
21	Electric System	
22	Labor	$14,71,892
23	Material/ Structure	2,772,313
24	Gas System	
25	Labor	17,596,273
26	Material/ Structure	2,122,631
27	Other	
28	Subtotal BTM Costs	$37,163,109
29	Program Management Costs (PMC)	-
30	Program Management Office (PMO)	$12,703,605)
31	Outreach	588,149
32	Design/Construction Management (CM)	$22,329,514
33	Cancelled Project Costs	158,517
34	Subtotal Program Management Costs	$35,779,834
35	Total	$214,307,389

1. Explanation of Cost Categories[25]

- TTM Contractor Costs include trenching, purging the legacy system, removal of the master meter, installing conduit and pipe, and restoration.
- TTM Costs for Utility Crews Supporting Program include the costs of Company labor in support of the program, such as setting meters and gas relights, and the procurement and warehousing of materials.
- BTM Contractor Costs are costs reimbursed to the MHP owner/operator to perform BTM construction work. BTM contractors are selected by the MHP owner/operator.
- Program Management Costs (PMC)[26] are comprised of:
  - PMO Costs, which include overall Program Management (e.g., Program Controls, Contract management, Change management, Schedule management and project management);
  - Design/ Construction Management Costs, which include the cost of Inspectors, Associate Distribution Estimators, and other support personnel who also perform work at multiple construction sites; and
  - Outreach activities related to Customer Impact cost.
- Cancelled Project Costs are costs related to preliminary project costs (such as engineering and design costs) for projects where the MHP Owner/Operator(s) decided to opt out or canceled the project due to numerous reasons such as costs not covered by the MHP Program.

K. Conclusion

For the reasons discussed in this chapter, PG&E requests the Commission find that the $214.31 million in costs PG&E incurred for projects completed in January 1, 2021, through December 31, 2024 were reasonably incurred.

---

25 See D.20-04-004; see also Appendix B for additional discussion of cost categories.

26 PMC are tracked separately from TTM costs and BTM contractor costs and allocated to each MHP as part of the project.

(PG&E-6)

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 12

ATTACHMENT A

MOBILE HOME PARK UTILITY UPGRADE PROGRAM,

2024 CPUC ANNUAL REPORT

Pacific Gas and Electric Company®





Mobilehome Park Utility Conversion Program 2024 Report to the California Public Utilities Commission

Filing Date: January 31, 2025

PUBLIC VERSION

PACIFIC GAS AND ELECTRIC COMPANY
MOBILEHOME PARK UTILITY CONVERSION PROGRAM
2024 REPORT TO THE CALIFORNIA PUBLIC UTILITIES COMMISSION

TABLE OF CONTENTS

A. Mobilehome Park Utility Conversion Program Overview 1

1. Executive Summary 1

2. Procedural History 1

3. Program Vision 2

4. Report Objectives 2

5. Program Timeline and Current Progress 2

6. Cost Assessment 7

B. Conclusion 7

Attachment 1: Annual Report Template Atch1-1

Attachment 2: Mobilehome Park List Atch2-1

Attachment 3: Officer Verification Atch3-1

A. Mobilehome Park Utility Conversion Program Overview

1. Executive Summary

Through the California Public Utilities Commission's (CPUC or Commission) Mobilehome Park Utility Conversion Program (UCP or Program), participating utilities work to replace mobilehome park (MHP) owned and operated utility systems with direct public utility gas and electric service for individual MHP residents. Decision (D.) 20-04-004 directed Pacific Gas and Electric Company (PG&E) to convert approximately 2.5 percent of mobilehome spaces in its service territory annually with an annual soft cap of $80 million dollars. PG&E has met this requirement in 2024.This report provides a programmatic review of 2024's trends, spending, and conversions in the Program.

2. Procedural History

On March 14, 2014, the Commission issued D.14-03-021, approving a three year "living pilot" Program (Pilot) to convert 10 percent of MHP spaces in California from master-meter service to direct utility service.[1]

PG&E filed Advice Letters 3822-G/5033-E, 3822-G-A/5033-E-A, 3822-G-B/5033-E-B on March 17, 2017, March 28, 2017, and August 10, 2017, respectively, to confirm completion of the Pilot Program and request to continue the Program beyond 2018 consistent with Commission direction. These were subsequently approved in Resolution E--4878, allowing PG&E to continue its MHP Pilot until the earlier of either December 31, 2019, or the issuance of a Commission decision for the continuation, expansion, or modification of the program beyond December 31, 2019. The number of spaces converted in 2018 and 2019 was not to exceed the levels specified in each IOU's respective advice letter filings.

On March 18, 2019, Resolution E-4958 authorized all participating electric and gas utilities to continue their MHP Pilot until the earlier of either December 31, 2021, or the issuance of a Commission decision for the continuation, expansion, or modification of the program beyond December 31, 2021.

---

1 D.14-03-021.

On April 16, 2020, the Commission issued D.20-04--004, establishing a 10--year MHP UCP, beginning in 2021, which modified certain eligibility, annual target conversion rates, and cost targets from the Pilot.

On December 19, 2024, D.24-12-037 to adopt a 200-amp electric service standard for the existing MHP UCP. D.24-12-037 only applies to parks that have not yet been converted, and does not apply retroactively to parks that have already signed MHP UCP agreements or have already completed design or construction.

3. Program Vision

Working with the CPUC's Safety Enforcement Division (SED) and the California Department of Housing and Community Development (HCD), PG&E will provide safe, and reliable energy for MHP residents.

4. Report Objectives

Pursuant to D.20-04-004,[2] PG&E uses the Revised Annual Report Template to prepare an annual report for the MHP UCP.[3] This annual report is a comprehensive accounting of the 2024 year and includes:

- A narrative assessment of the MHP Program.
- An updated conversion data and financials displayed with the use of Table 5 in D.20-04-004.
- An updated list of all MHP conversions completed, including city and county, space count, gas utility company and electric utility company performing each conversion.

5. Program Timeline and Current Progress

PG&E completed its second full year of the MHP UCP in 2023, after transitioning from the Pilot in 2021. As of December 31, 2024, PG&E has completed 193 MHP projects, which includes 16,544 permitted mobilehome spaces.

As of January 17, 2025, there are 204 active parks in PG&E's portfolio in different project phases:

---

2 D.20-04-004, Ordering Paragraph 10.

3 D.20-04-004, Appendix B, Table 5: New Annual Report Data Template.

1) Outreach (115 parks);
2) Planning (7 parks);
3) Application (30 parks);
4) Design (24 parks);
5) Construction (23 parks); and
6) Closeout (5 parks).

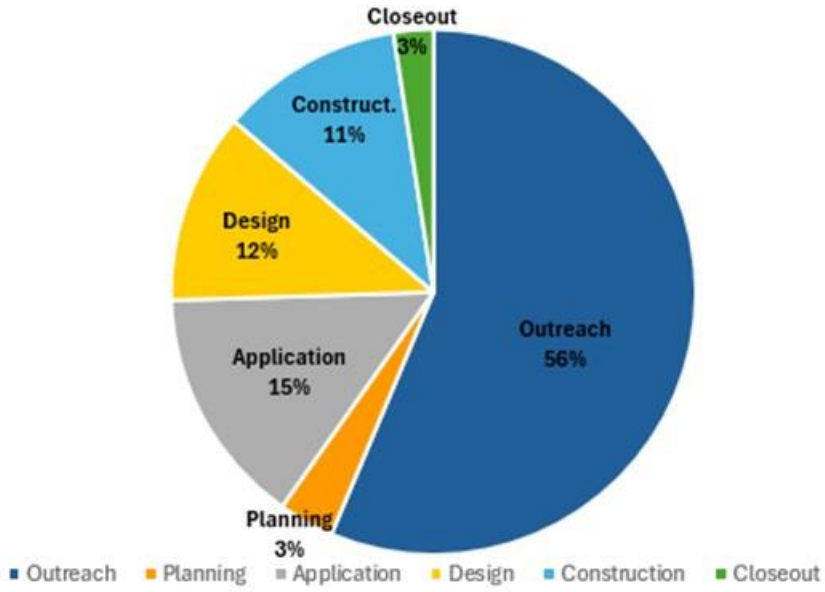


Figure 1: PG&E 2025 MHP UCP Portfolio Breakdown

The 115 parks in the outreach phase do not have forecasted schedules as they will be determined upon the beginning of the planning phase. The schedule is subject to change and assumes that there are no obstacles to prevent an MHP's participation in the Program, such as the MHP owner's ability and willingness to: (1) complete and move forward with a detailed application, (2) execute the Program Agreement, (3) grant the required easements, (4) secure a qualified Beyond-The-Meter (BTM) contractor, (5) finance the BTM construction activities and To-The-Meter (TTM) scope that are not covered under D.20-04-004, as well as (6) meet the prescribed program schedule.

Further assumptions include, but are not limited to, the total number of MHP spaces indicated on the Form of Intent completed by the MHP owners is accurate, the ability for a joint schedule to be developed, accepted, and executed by all impacted utilities where shared territory requires joint

construction. The schedule is further dependent on availability of both TTM and BTM contractors having qualified crews to perform construction and HCD and/or other jurisdictional agencies having available trained resources to perform timely inspections on completed portions of the projects. PG&E's schedule is expected to change throughout the Program's life.

PG&E has successfully concluded outreach to all parks designated by the CPUC in Category 1 and is working to initiate the planning phase for the last of these parks. PG&E has also begun soliciting applications from Category 2 parks and successfully contacted 115 of the 418 parks listed, as of December 31, 2024.

5.1 Potential Delays

Going forward, PG&E anticipates several factors may begin, or continue, impacting the pace of conversion as PG&E progresses through the remaining MHPs on the SED's prioritization list, discussed below.

5.1.1 Supply Chain Delays

Construction schedules continue to be impacted by supply chain delays, as highlighted in last year's annual report. To date, pedestal and transformers availability appears to be the most significant of all material delays, with lead times exceeding 52 weeks at times. Furthermore, manufacturers and/or distributors have occasionally changed committed delivery dates with little notice, making it difficult to find alternative models or develop plans to mitigate delays.

Electric pedestals are classified as a BTM material. The MHP owner and the BTM contractor are responsible for procurement and installation. As the contractual relationship is between the MHP Owner and their choice of BTM contractor, this limits PG&E's intervention or ability to mitigate delays. PG&E will continue to partner with the owner and their representatives to the best of their ability.

Additional delays could materialize due to the adoption of the 200-amp standard. As of December 19, 2024, the CPUC ratified D.24-12-037 that mandates the implementation of a 200-amp electric service standard in place of the previous 100-amp standard. PG&E has been

re-evaluating program execution timelines to procure the 200-amp pedestals. PG&E anticipates an increase in lead times as manufacturers increase 200-amp pedestal production.

5.1.2 Santa Nella Utility Conversion Project (SNUC Project)

On April 27, 2023, the Commission issued D.23-04-057 to address the potential loss of natural gas service for a portion of the Santa Nella MHP, whose private master metered gas provider, SNME Inc., was experiencing financial difficulties. The Decision ordered the conversion of the SNME gas system from master metered service to direct metered service.[4] Simultaneously, both the TTM infrastructure and BTM infrastructure will be upgraded to accommodate 200-amp electric service to each home.[5] PG&E's MHP UCP will complete this work with resources, budget and scheduling originally allocated to the conversion of parks on the CPUC priority list.

As of December 2024, PG&E has been actively collaborating to develop a planning and design framework for approval of new installations. The design walk has been completed for both Santa Nella and the portion of MHP where all gas and electric meters have been in front of the homes. Additionally, the customer outreach team has conducted door-door visits to provide residents with project updates, share the latest status and collect new applications from residents with pending submissions. Planning and design completion is anticipated in 2025.

5.1.3 Recreational Vehicles and Park Models

Recreational vehicles (RV) and park trailers fall outside the inspection jurisdiction of HCD. Many mobilehome parks include RVs and park trailers occupying permitted mobilehome spaces. Due to these units being outside of the HCD jurisdiction, the lack of HCD inspection for these units present challenges in ensuring compliance with PG&E Gas Service Record (GSR) requirements. PG&E GSRs will not supply a gas meter to spaces that do not pass HCD inspection. As a result, it

---

4 D.23-04-057, Ordering Paragraph 1.

5 D.23-04-057, Ordering Paragraph 2.

has become increasingly difficult to pass inspection and provide direct gas service to these spaces.

5.1.4 HCD Jurisdiction Inspection Concerns

Throughout the year, the PG&E team has encountered inconsistencies with HCD inspections, particularly regarding bollards, inspection scheduling, rule enforcement and the clarity of installation guidelines. For example, bollards are installed according to PG&E standards – less than 3 feet away from driveways for electric equipment and less than 8 feet for gas equipment. However, HCD guidelines only state that equipment must be protected from vehicular damage in a manner that meets that approved by the enforcement agency, without providing specific details on how this protection should be implemented. Additionally, inspection delays have occurred due to a shortage of inspectors and requirements for additional inspections during cutovers, further impacting timelines. .

5.2 Programmatic Implementation

PG&E collaborated with the Commission on the following matters of programmatic implementation:

5.2.1 Gas Stubs

The MHP UCP Agreement indicates that vacant mobilehome spaces will receive a stub to the location of the future “Service Delivery Point”.[6]

In recent discussions with CPUC Staff, PG&E has highlighted its concerns for the Commission to consider modification of the MHP UCP Agreement in the upcoming revision window expected to begin in 2025 to forego the gas stub all together. PG&E will continue to install these stubs, in compliance, until further notice. For the year of 2024, gas stubs have been implemented and installed in all parks converted during this period. The gas stub installation requires additional fittings, such as ETS and other materials, to leave a 3-foot stub, which is considered costly for vendors and requires sourcing additional materials. PG&E continues the need for a modification to the MHP UCP agreement

[6] D.20-04-004, p. 224.

during the upcoming revision window, expected to begin in 2025. Specifically, PG&E recommends eliminated the gas stub requirement for vacant spaces to address cost concerns and reduce safety risks for idle facilities. Until further guidance, PG&E will proceed with installing short gas extensions in compliance with current agreement.

5.2.2 Existing Distribution System (Legacy System)

The MHP UCP agreement requires park owners to operate and maintain the existing legacy distribution system, ensuring ongoing maintenance. However, the absence or poor quality of records has created challenges for compliance with the UCP. Identifying the type and ownership of underground lines has proven difficult. PG&E remains committed to working with MHP owners to locate and identify these underground facilities. Additionally, there is a heightened safety risk associated with excavating unmarked or unmapped areas and potentially encountering energized Lines. PG&E recommends including additional language in the MHP agreement requiring park owners to provide accurate maps. Alternatively, the CPUC could consider a decision to allocate additional funding to cover exploration costs, given the increased liability faced by EPC vendors.

6. Cost Assessment

Attachment 1 ("Annual Report Template") reflects the space counts and costs of projects through December 31, 2024. These costs are believed to be all inclusive, subject to any potential trailing costs.[7]

B. Conclusion

Pursuant to D.14-03-021, Ordering Paragraph 8, a reasonableness review of all completed Program projects is performed in PG&E's General Rate Case (GRC). For further details regarding specific projects from Program inception through December 31, 2017, please refer to PG&E's 2020 GRC.[8] For projects completed between January 1, 2018, and December 31, 2020, please refer to

---

[7] Trailing costs include, but are not limited to, contractor invoices, internal labor charges, or other costs which may not have been received within PG&E's closing period.

[8] A.18-12-009, PG&E 2020 GRC, Exhibit (PG&E-12), Chapter 13 (Revised June 18, 2019).

PG&E's filing in Track 2 of its 2023 GRC.[9] PG&E will be submitting specific project details for all projects completed between 2021 and 2024 in PG&E's 2027 GRC.

[9] A.21-06-021, PG&E 2023 GRC, Track 2 Prepared Testimony, Chapter 5.

PACIFIC GAS AND ELECTRIC COMPANY

MOBILEHOME PARK UTILITY CONVERSION PROGRAM 2024

REPORT TO THE CALIFORNIA PUBLIC UTILITIES COMMISSION

ATTACHMENT 1

ANNUAL REPORT TEMPLATE

Annual Report Template*		Per-year costs; not cumulative									
	Descriptor	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Program Participation											
CARE/FERA enrollment	Number of individuals enrolled in CARE/FERA after the conversion	0	112 Customers	378 Customers	1,331 Customers	343 Customers	689 Customers	525 Customers	752 Customers	876 Customers	632 Customers
Medical Baseline	Number of individuals enrolled in Medical Baseline after the conversion	0	13 Customers	100 Customers	69 Customers	53 Customers	85 Customers	33 Customers	82 Customers	53 Customers	74 customers
Disadvantaged Community	Number of converted spaces within geographic zones defined by SB 535 map.	0	77	139	1,395	137	618	491	543	490	317
Rural Community**	Number of converted spaces within rural community	0	49	26	27	1,248	0	0	0	453	417
Urban Community**	Number of converted spaces within urban community	0	211	974	3,342	2,465	846	941	1,547	1,547	1,089
Leak Survey (Optional)	Number of Leaks identified during preconstruction activity (if known) *Note: gas leak figures are revised from previous report. PG&E previously reported the total quantity of leaks identified in program. The quantity of leaks reported in this report are those identified at financially closed parks only.*	0	33	90	370	246	38	65	143	121	176
Completed Spaces* **	Spaces converted that correspond to the project costs reported below. If a project incurs costs over multiple years, report all project costs and spaces converted in the year the project closes.										
Number of TTM MH and Covered Common Area Locations Converted (Gas)		0	265	890	3,054	3,535	1,168	828	1,567	2,022	1,450
Number of TTM MH and Covered Common Area Locations Converted (Electric)		0	167	844	2,903	3,114	1,123	695	1,412	1,186	1,485
Number of BTM MH Converted Register Spaces (Gas)		0	261	856	2,687	3,533	1,108	813	1,547	1,991	1,430
Number of BTM MH Converted Register Spaces (Electric)		0	167	818	2,633	2,979	1,057	692	1,411	1,173	1,485
Cost Information											
To The Meter - Capital Costs											
Construction Direct Costs											
Civil/Trenching	To the Meter Construction costs for civil related activities										
Electric		$ -	$ 3,389,445.66	$ 14,548,355.83	$ 16,518,576.87	$ 24,023,811.96	$ 7,701,185.08	$ 4,686,453.08	$ 8,879,333.00	$ 8,655,372.99	$11,795,608
Gas		$ -	$ 5,079,659.15	$ 17,651,853.52	$ 14,982,685.92	$ 25,886,529.08	$ 5,907,771.56	$ 5,535,325.60	$ 9,103,189.91	$ 13,537,271.39	$9,892,022
Gas System											
Labor	Cost for installation of distribution Gas assets, pre-inspection testing, decommissioning of legacy system (Gas Design cost was previously incorporated here)	$ -	$ 1,846,728.94	$ 6,417,396.86	$ 5,447,011.07	$ 9,411,143.72	$ 2,147,792.28	$ 2,012,388.17	$ 3,309,498.48	$ 4,921,525.26	$3,596,281
Material / Structures	Pipes, fittings and other necessary materials required for gas construction	$ -	$ 533,258.63	$ 1,853,077.72	$ 1,572,870.60	$ 2,717,547.49	$ 620,193.22	$ 581,094.13	$ 955,645.73	$ 1,421,132.12	$1,038,457
Electric System											
Labor	Cost for installation of distribution Electric assets, pre-inspection testing, decommissioning of legacy system (Electric Design cost was previously incorporated here)	$ -	$ 1,851,374.10	$ 7,946,564.65	$ 9,022,733.61	$ 13,122,223.38	$ 4,206,521.06	$ 2,559,822.08	$ 4,850,045.92	$ 4,727,715.07	$6,442,966
Material / Structures	Cables, conduits, poles, transformers and other necessary materials for electrical construction	$ -	$ 854,710.42	$ 3,668,632.73	$ 4,165,459.83	$ 6,058,041.47	$ 1,941,994.00	$ 1,181,774.45	$ 2,239,085.44	$ 2,182,609.85	$2,974,477
Design/Construction Management	Cost for engineering, design and construction inspection cost	$ -	$ 2,616,623.78	$ 7,530,961.37	$ 7,036,462.87	$ 13,019,473.31	$ 4,018,563.12	$ 3,214,477.49	$ 5,479,522.24	$ 6,486,102.81	$6,144,078

Annual Report Template*		Per-year costs; not cumulative									
Other											
Labor (Internal)	Meter installation, gas relights, easements, environmental desktop reviews and other support organizations	$ -	$ 720,980.74	$ 1,014,965.12	$ 758,081.34	$ 1,368,086.96	$ 553,509.37	$ 389,614.96	$ 884,662.71	$ 1,440,839.21	$1,341,755
Other Labor (Internal)****											
Non-Labor	Permits obtained internally	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Materials	meters, modules and regulators	$ -	$ 10,456.92	$ 459,899.73	$ 460,755.39	$ 599,760.87	$ 194,760.95	$ 18,074.71	$ (16,310.77)	$ 49,410.25	$244,662
Program - Capital Costs	Costs that are inconsistent among the other IOUs, driven by utility specific business models or cost accounting practices. These costs should be separated out so that others do not compare costs that are not comparable with others.										
Project Management Costs											
Project Management Office (PMO)	Program management office costs (Project Management, Program Management, schedulers, cost analysts and field engineers)	$ -	$ 1,034,504.08	$ 4,187,872.64	$ 3,275,972.63	$ 7,807,372.76	$ 2,564,788.87	$ 1,989,515.29	$ 2,484,568.53	$ 2,624,188.91	$2,274,083
Outreach											
Property Tax	Property tax on capital spending not yet put into service	$ -	$-	$-	$-	$-	$-	$-	$-		
AFUDC	AFUDC is a mechanism in which the utility is allowed to recover the financing cost of it's construction activities. AFUDC starts when the first dollar is recorded on the project and ends when HCD complete the first inspection so that the new assets are in use by the residents.	$ -	$ 493,360.94	$ 2,363,699.29	$ 2,301,853.83	$ 4,071,748.91	$ 693,184.39	$ 728,624.16	$ 1,611,021.97	$ 1,501,904.55	$2,343,341
Other											
Labor (Internal)****											
Non-Labor	Utility specific overhead driven by corporate cost model	$ -	$ 1,461,706.86	$ 2,984,508.77	$ 2,493,289.60	$ 4,325,937.32	$ 1,643,042.79	$ 981,662.58	$ 2,470,681.36	$ 3,841,760.37	$3,538,545
Sub-Total Capital Cost		**$ -**	**$ 19,892,810.21**	**$ 70,627,788.22**	**$ 68,035,753.56**	**$ 112,411,677.23**	**$ 32,193,306.68**	**$ 23,878,826.70**	**$ 42,250,944.52**	**$ 51,389,832.76**	**$ 51,626,275.00**
To The Meter - Expense Costs											
Project Management Costs											
Project Management Office (PMO)*****	Program startup cost	$ 3,589,133.34	$ 524,994.32	$ 617,274.79	$ 766,815.69	$ 395,054.77	$ 1,519,983.76	$ (1,071,120.36)	$ 105,043.01	$ 93,143.63	$524,212
Outreach	Outreach efforts to educate MHP Owners, residents, government and local agencies about the program	$ 1,464,287.53	$ 363,662.88	$ 373,846.31	$ 278,298.53	$ 214,408.80	$ 198,054.17	$ 419,866.66	$ 109,782.35	$ 21,215.43	$18,671
Other											
Labor (Internal)	Program startup cost for supporting organizations	$ 254,755.50	$ 104,036.52	$ 147,629.78	$ 150,353.89	$ 76,260.52	$ 9,730.55	$ 9,373.37	$ 5,526.92	$ 3,645.88	$-
Other Labor (Internal)****		$ 939.98	$ 281,952.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$-
Design/Construction Management	Training Cost for engineering, design and construction inspection cost	$ 643,724.95	$ 1,217,160.73	$ 418,743.57	$ 574,565.02	$ 460,494.64	$ 235,898.47	$ 229,496.67	$ 117,324.62	$ 127,754.67	$145,524
Non-Labor	Utility specific overhead driven by corporate cost model	$ -	$ 381,939.69	$ 448,445.71	$ 435,255.87	$ 284,532.57	$ 155,381.91	$ 314,677.26	$ 102,020.56	$ 25,613.62	$14,652
Cancelled project cost	Cancelled Project Costs from MHPs that have failed to complete the MHP agreement or have cancelled the project	$ -	$ -	$ 484,671.19	$ 175,573.00	$ 101,540.65	$ 21,505.73	$ 65,844.42	$ 92,672.32	$ -	$-
Sub-Total To The Meter		**$ 5,952,841.30**	**$ 22,766,556.35**	**$ 73,118,399.57**	**$ 70,416,615.56**	**$ 113,943,969.18**	**$ 34,333,861.27**	**$ 23,846,964.72**	**$ 42,783,314.30**	**$ 51,661,205.99**	**$ 52,329,334.00**
Beyond The Meter - Capital	Pass through cost where the MHP Owner is responsible for overseeing the vendor's work and IOU to reimburse per D.14-02-021										
Civil/Trenching	N/A										
Electric System											
Labor	Labor and material for installing BTM Electric	$ -	$ 1,559,073.58	$ 7,162,254.51	$ 8,403,547.07	$ 11,258,308.86	$ 3,677,832.26	$ 2,478,150.88	$ 4,168,932.62	$ 3,622,169.24	$4,358,246
Material / Structures	infrastructure (e.g. Pedestal, foundation, meter	$ -	$ 294,593.21	$ 1,353,336.76	$ 1,587,883.98	$ 2,127,302.68	$ 694,941.18	$ 468,256.56	$ 787,736.57	$ 684,423.43	$823,508
Gas System											
Labor	Labor and material for installing BTM Gas	$ -	$ 3,108,441.89	$ 9,264,600.90	$ 8,170,577.85	$ 12,506,295.31	$ 3,735,841.81	$ 2,479,778.62	$ 4,611,648.83	$ 5,748,968.30	$4,625,766
Material / Structures	infrastructure (e.g. houselines, meter	$ -	$ 374,970.03	$ 1,117,584.88	$ 985,613.34	$ 1,508,629.10	$ 450,653.01	$ 299,134.64	$ 556,301.24	$ 693,495.61	$558,004
Other	BTM Permits, including HCD fees										
Other Labor (Internal)****		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Sub-Total Beyond The Meter		**$ -**	**$ 5,337,078.71**	**$ 18,897,777.05**	**$ 19,147,622.24**	**$ 27,400,535.95**	**$ 8,559,268.26**	**$ 5,725,320.70**	**$ 10,124,619.26**	**$ 10,749,056.58**	**$ 10,365,524.00**
Total TTM & BTM		**$ 5,952,841.30**	**$ 28,103,635.06**	**$ 92,016,176.62**	**$ 89,564,237.80**	**$ 141,344,505.13**	**$ 42,893,129.53**	**$ 29,572,285.42**	**$ 52,907,933.56**	**$ 62,410,262.57**	**$ 62,694,858.00**

Annual Report Template*		Per-year costs; not cumulative									
Rate Impact and Revenue Requirement											
Rate Impact		**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**	**2024**
Gas											
Average Rate w/o MMBA recovery - non CARE	Average Non-CARE Residential Rate w/o MHPBA recovery - Core ($/therm)	$ 1.496570	$ 1.471460	$ 1.596710	$ 1.516020	$ 1.602300	$ 1.602300	$ 1.602300	$ 1.602300	$ 1.602300	$ 1.602300
Average Rate w/ MMBA recovery - non CARE	Average Non-CARE Residential Rate w/ MHPBA recovery - Core ($/therm)	$ 1.496660	$ 1.472710	$ 1.597840	$ 1.518670	$ 1.612440	$ 1.613640	$ 1.613290	$ 1.612850	$ 1.612430	$ 1.612010
Rate Change - non Care	Non-CARE Residential Rate Change - Core ($/therm)	$ 0.000090	$ 0.001250	$ 0.001130	$ 0.002650	$ 0.010140	$ 0.011340	$ 0.010990	$ 0.010550	$ 0.010130	$ 0.009710
% Rate Change - non Care	% Non-CARE Residential Rate Change - Core	0.01%	0.08%	0.07%	0.17%	0.63%	0.71%	0.69%	0.66%	0.63%	0.61%
Average Rate w/o MMBA recovery - Non-Core		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Average Rate w/ MMBA recovery - Non-Core		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Rate Change - Non-Core		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
% Rate Change - Non-Core		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Electric											
Average Rate w/o MMBA recovery - Total System		$ 0.171752	$ 0.177724	$ 0.187776	$ 0.195360	$ 0.195360	$ 0.195360	$ 0.195360	$ 0.195360	$ 0.195360	$ 0.195360
Average Rate w/ MMBA recovery - Total System		$ 0.171755	$ 0.177762	$ 0.187792	$ 0.195450	$ 0.195676	$ 0.195719	$ 0.195708	$ 0.195694	$ 0.195681	$ 0.195667
Rate Change - Total System		$ 0.000003	$ 0.000038	$ 0.000017	$ 0.000091	$ 0.000316	$ 0.000360	$ 0.000348	$ 0.000335	$ 0.000321	$ 0.000308
% Rate Change - Total System		0.00%	0.02%	0.01%	0.05%	0.16%	0.18%	0.18%	0.17%	0.16%	0.16%
Revenue Requirement		**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**	**2024**
Gas Revenue Requirement-TTM		$ 3,008,794	$ 1,949,069	$ 4,012,942	$ 12,653,985	$ 18,226,604	$ 19,562,465	$ 19,192,637	$ 18,602,911	$ 18,026,694	$ 17,463,480
Electric Revenue Requirement-TTM		$ 2,948,668	$ 1,743,681	$ 3,709,280	$ 13,209,572	$ 18,896,451	$ 20,134,466	$ 19,711,265	$ 19,084,547	$ 18,472,035	$ 17,872,307
Gas Revenue Requirement-BTM		$ -	$ 147,971	$ 3,256,959	$ 5,004,983	$ 8,150,581	$ 8,840,665	$ 8,336,032	$ 7,843,959	$ 7,351,553	$ 6,859,156
Electric Revenue Requirement-BTM		$ -	$ 134,950	$ 3,384,210	$ 4,250,109	$ 7,559,478	$ 8,356,323	$ 7,878,868	$ 7,414,811	$ 6,950,399	$ 6,485,997

*An appendix can be provided to define each category if needed

**The Census Bureau identifies two types of urban areas:
•Urbanized Areas (UAs) of 50,000 or more people;
•Urban Clusters (UCs) of at least 2,500 and less than 50,000 people.
"Rural" encompasses all population, housing, and territory not included within an urban area. The Census Bureau website is: https://www.census.gov/geo/reference/urban-rural.html.

***Completed space count includes spaces at parks affected by the Camp Fire that have scope eligible for recovery under the Rule 28 MHP Utility Conversion Program. For 2023, the total TTM + BTM spend does not include the cost associated borne from the Camp Fire parks as it is not available at the time of reporting. Cost accounting will be updated in 2024 annual report.

****Provide as many labor cost lines with descriptions as needed to clarify types of labor included in project.

***** The credit indicated in 2021 was due to a change order settlement with a vendor on project cost in 2020. Due to the timing of the change order, the cost was not reallocated to the associated capital projects in time within 2020 and was reallocated in 2021, causing a credit in 2021.

PACIFIC GAS AND ELECTRIC COMPANY

MOBILEHOME PARK UTILITY CONVERSION PROGRAM 2024

REPORT TO THE CALIFORNIA PUBLIC UTILITIES COMMISSION

ATTACHMENT 2

MOBILEHOME PARK LIST

2024 CPUC Annual Report - MHP List

HCDID	Category	Park Name	Space Count	Status	Electric Utility	Gas Utility	City	County
[redacted]	1	[redacted]		Conversion Complete	PG&E	PG&E	CASTRO VALLEY	ALAMEDA
	1			Conversion Complete	PG&E	PG&E	LIVERMORE	ALAMEDA
	1			Conversion Complete	PG&E	PG&E	SAN LEANDRO	ALAMEDA
	1			Conversion Complete	PG&E	PG&E	SAN LEANDRO	ALAMEDA
	1			Conversion Complete	PG&E	PG&E	CASTRO VALLEY	ALAMEDA
	1			Conversion Complete	PG&E	PG&E	HAYWARD	ALAMEDA
	1			Conversion Complete	PG&E	PG&E	UNION CITY	ALAMEDA
	1			Conversion Complete	PG&E	PG&E	OROVILLE	BUTTE
	1			Conversion Complete	PG&E	PG&E	GRIDLEY	BUTTE
	1			Conversion Complete	PG&E	PG&E	CHICO	BUTTE
	1			Conversion Complete	PG&E	PG&E	OROVILLE	BUTTE
	1			Conversion Complete	PG&E	PG&E	OROVILLE	BUTTE
	1			Conversion Complete	PG&E	PG&E	CHICO	BUTTE
	1			Conversion Complete	PG&E	PG&E	PALERMO	BUTTE
	1			Conversion Complete	PG&E	PG&E	PARADISE	BUTTE
	1			Conversion Complete	PG&E	PG&E	OROVILLE	BUTTE
	1			Conversion Complete	PG&E	PG&E	MAXWELL	COLUSA
	1			Conversion Complete	PG&E	PG&E	RODEO	CONTRA COSTA
	1			Conversion Complete	PG&E	PG&E	SAN PABLO	CONTRA COSTA
	1			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	1			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	1			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	1			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	1			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	1			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	1			Conversion Complete	PG&E	PG&E	CLOVIS	FRESNO
	1			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	1			Conversion Complete	PG&E	PG&E	PINEDALE	FRESNO
	1			Conversion Complete	PG&E	PG&E	ORLAND	GLENN
	1			Conversion Complete	PG&E	PG&E	EUREKA	HUMBOLDT
	1			Conversion Complete	PG&E	PG&E	EUREKA	HUMBOLDT
	1			Conversion Complete	PG&E	PG&E	ARCATA	HUMBOLDT
	1			Conversion Complete	PG&E	PG&E	EUREKA	HUMBOLDT
	1			Conversion Complete	PG&E	PG&E	RIO DELL	HUMBOLDT
	1			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	1			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	1			Conversion Complete	PG&E	Southern California Gas Company	BAKERSFIELD	KERN
	1			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	1			Conversion Complete	PG&E	PG&E	UKIAH	MENDOCINO
	1			Conversion Complete	PG&E	PG&E	UKIAH	MENDOCINO
	1			Conversion Complete	PG&E	PG&E	WILLITS	MENDOCINO
	1			Conversion Complete	PG&E	PG&E	ATWATER	MERCED
	1			Conversion Complete	PG&E	PG&E	MERCED	MERCED
	1			Conversion Complete	PG&E	PG&E	ATWATER	MERCED
	1			Conversion Complete	PG&E	PG&E	LOS BANOS	MERCED
	1			Conversion Complete	PG&E	PG&E	SEASIDE	MONTEREY
	1			Conversion Complete	PG&E	PG&E	SALINAS	MONTEREY
	1			Conversion Complete	PG&E	PG&E	AMERICAN CANYON	NAPA
	1			Conversion Complete	PG&E	PG&E	GRASS VALLEY	NEVADA
	1			Conversion Complete	PG&E	PG&E	GRASS VALLEY	NEVADA
	1			Conversion Complete	PG&E	PG&E	ROCKLIN	PLACER
	1			Conversion Complete	PG&E	PG&E	LOOMIS	PLACER
	1			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	1			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	1			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	1			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	1			Conversion Complete	PG&E	PG&E	HOLLISTER	SAN BENITO
	1			Conversion Complete	PG&E	PG&E	TRACY	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	LOCKEFORD	SAN JOAQUIN
	1			Conversion Complete	City of Lodi	PG&E	LODI	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	TRACY	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	TRACY	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	Southern California Gas Company	BAYWOOD PARK	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	Southern California Gas Company	ATASCADERO	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	Southern California Gas Company	SAN LUIS OBISPO	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	Southern California Gas Company	PASO ROBLES	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	Southern California Gas Company	ARROYO GRANDE	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	PG&E	BRISBANE	SAN MATEO
	1			Conversion Complete	PG&E	PG&E	EAST PALO ALTO	SAN MATEO
	1			Conversion Complete	PG&E	Southern California Gas Company	SANTA MARIA	SANTA BARBARA
	1			Conversion Complete	PG&E	Southern California Gas Company	SANTA MARIA	SANTA BARBARA
	1			Conversion Complete	PG&E	Southern California Gas Company	SANTA MARIA	SANTA BARBARA
	1			Conversion Complete	PG&E	Southern California Gas Company	SANTA MARIA	SANTA BARBARA
	1			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	MORGAN HILL	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	LOS GATOS	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	MOUNTAIN VIEW	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	BOULDER CREEK	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SANTA CRUZ	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SANTA CRUZ	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	APTOS	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SOQUEL	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SOQUEL	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SOQUEL	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SCOTTS VALLEY	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	CAPITOLA	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SCOTTS VALLEY	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	BURNEY	SHASTA
	1			Conversion Complete	PG&E	PG&E	REDDING	SHASTA
	1			Conversion Complete	City of Lake Shasta	PG&E	SUMMIT CITY	SHASTA
	1			Conversion Complete	PG&E	PG&E	ANDERSON	SHASTA
	1			Conversion Complete	PG&E	PG&E	COTTONWOOD	SHASTA
	1			Conversion Complete	PG&E	PG&E	REDDING	SHASTA
	1			Conversion Complete	PG&E	PG&E	REDDING	SHASTA
	1			Conversion Complete	PG&E	PG&E	VACAVILLE	SOLANO
	1			Conversion Complete	PG&E	PG&E	BENICIA	SOLANO
	1			Conversion Complete	PG&E	PG&E	VACAVILLE	SOLANO
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	COTATI	SONOMA
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1	LAMPLIGHTER MHP	109	Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA

HCDID	Category	Park Name	Space Count	Status	Electric Utility	Gas Utility	City	County
[redacted]	1	[redacted]	[redacted]	Conversion Complete	PG&E	PG&E	SONOMA	SONOMA
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	SONOMA	SONOMA
	1			Conversion Complete	PG&E	PG&E	HEALDSBURG	SONOMA
	1			Conversion Complete	PG&E	PG&E	OAKDALE	STANISLAUS
	1			Conversion Complete	PG&E	PG&E	OAKDALE	STANISLAUS
	1			Conversion Complete	PG&E	PG&E	YUBA CITY	SUTTER
	1			Conversion Complete	PG&E	PG&E	RED BLUFF	TEHAMA
	1			Conversion Complete	PG&E	PG&E	RED BLUFF	TEHAMA
	1			Conversion Complete	PG&E	PG&E	DAVIS	YOLO
	1			Conversion Complete	PG&E	PG&E	WEST SACRAMENTO	YOLO
	1			Conversion Complete	PG&E	PG&E	WEST SACRAMENTO	YOLO
	1			Conversion Complete	PG&E	PG&E	MARYSVILLE	YUBA
	1			Conversion Complete	PG&E	Southern California Gas Company	LOS ALAMOS	SANTA BARBARA
	2			Conversion Complete	PG&E	PG&E	IONE	AMADOR
	2			Conversion Complete	PG&E	PG&E	CHICO	BUTTE
	2			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	2			Conversion Complete	PG&E	PG&E	CLOVIS	FRESNO
	2			Conversion Complete	PG&E	PG&E	RIO DELL	HUMBOLDT
	2			Conversion Complete	PG&E	PG&E	MCKINLEYVILLE	HUMBOLDT
	2			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	2			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	2			Conversion Complete	PG&E	PG&E	MERCED	MERCED
	2			Conversion Complete	PG&E	PG&E	SALINAS	MONTEREY
	2			Conversion Complete	PG&E	PG&E	GRASS VALLEY	NEVADA
	2			Conversion Complete	PG&E	PG&E	GRANITE BAY	PLACER
	2			Conversion Complete	SMUD	PG&E	CITRUS HEIGHTS	SACRAMENTO
	2			Conversion Complete	PG&E	PG&E	SACRAMENTO	SACRAMENTO
	2			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	2			Conversion Complete	PG&E	PG&E	MOUNTAIN VIEW	SANTA CLARA
	2			Conversion Complete	PG&E	PG&E	ANDERSON	SHASTA
	2			Conversion Complete	PG&E	PG&E	SEBASTOPOL	SONOMA
	2.1			Conversion Complete	SMUD	PG&E	WEST SACRAMENTO	SACRAMENTO
	2.1			Conversion Complete	PG&E	PG&E	SALINAS	MONTEREY
	3			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	3			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	3			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	3			Conversion Complete	PG&E	PG&E	MADERA	MADERA
	3			Conversion Complete	SMUD	PG&E	ORANGEVALE	SACRAMENTO
	BUTTE			Conversion Complete	PG&E	PG&E	PARADISE	BUTTE
	2			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	2			Conversion Complete	PG&E	PG&E	CONCORD	CONTRA COSTA
	2			Conversion Complete	PG&E	PG&E	VALLEJO	SOLANO
	2			Conversion Complete	PG&E	PG&E	MILPITAS	SANTA CLARA
	3			Conversion Complete	PG&E	PG&E	CLOVIS	FRESNO
	2			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	2			Conversion Complete	PG&E	PG&E	PETALUMA	SONOMA
	3			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	3			Conversion Complete	PG&E	PG&E	LODI	SAN JOAQUIN
	3			Conversion Complete	N/A	PG&E	MARYSVILLE	YUBA
	3			Conversion Complete	Redding Electric Utility	PG&E	REDDING	SHASTA
	3			Conversion Complete	PG&E	PG&E	WEST SACRAMENTO	YOLO
	3			Conversion Complete	SMUD	PG&E	ELK GROVE	SACRAMENTO
	2			Conversion Complete	PG&E	PG&E	UKIAH	MENDOCINO
	2			Conversion Complete	SMUD	PG&E	RANCHO CORDOVA	SACRAMENTO
	2			Conversion Complete	PG&E	PG&E	ANTIOCH	CONTRA COSTA
	3			Conversion Complete	PG&E	PG&E	LODI	SAN JOAQUIN
	3			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	3			Conversion Complete	PG&E	PG&E	ESPARTO	YOLO
	2			Conversion Complete	PG&E	PG&E	MORGAN HILL	SANTA CLARA
	2			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	3			Conversion Complete	Redding Electric Utility	PG&E	REDDING	SHASTA
	BUTTE			Conversion Complete	PG&E	PG&E	PARADISE	BUTTE
	2			Conversion Complete	PG&E	PG&E	AUBURN	PLACER
	3			Conversion Complete	Redding Electric Utility	PG&E	REDDING	SHASTA
	BUTTE			Conversion Complete	PG&E	PG&E	PARADISE	BUTTE
	3			Conversion Complete	N/A	PG&E	HYDESVILLE	HUMBOLDT
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	2.1			Conversion Complete	PG&E	PG&E	NAPA	NAPA
	2.1			Conversion Complete	PG&E	PG&E	GRASS VALLEY	NEVADA
	2.1			Conversion Complete	PG&E	PG&E	ROHNERT PARK	SONOMA
	3			Conversion Complete	PG&E	PG&E	OROVILLE	BUTTE
	3			Conversion Complete	PG&E	PG&E	VACAVILLE	SOLANO
	3			Conversion Complete	PG&E	PG&E	MORGAN HILL	SANTA CLARA
	3			Conversion Complete	PG&E	PG&E	VALLEJO	SOLANO
	1.2			Conversion Complete	SMUD	PG&E	FOLSOM	SACRAMENTO
	1.2			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1.2			Conversion Complete	PG&E	Southern California Gas Company	GROVER BEACH	SAN LOUIS OBISPO
	1.2			Conversion Complete	PG&E	PG&E	PETALUMA	SONOMA
	1.2			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	1.2			Conversion Complete	PG&E	PG&E	PENNGROVE	SONOMA

Note: Some parks affected by the Camp Fire have scope eligible for recovery under the Rule 28 MHP Utility Conversion Program. Scope and associated costs eligible to be covered under the Rule 28 Mobilehome Park Utility Conversion Program Agreement were separated from scope and associated costs covered under the Butte County MHP Rebuild Agreement.

PACIFIC GAS AND ELECTRIC COMPANY

MOBILEHOME PARK UTILITY CONVERSION PROGRAM 2024

REPORT TO THE CALIFORNIA PUBLIC UTILITIES COMMISSION

ATTACHMENT 3

OFFICER VERIFICATION

VERIFICATION

I, Sandra Cullings, say:

I am an officer of Pacific Gas and Electric Company (PG&E), a California corporation, and am authorized pursuant to Rule 2.1 and Rule 1.11 of the Rules of Practice and Procedure of the California Public Utilities Commission to make this Verification for and on behalf of PG&E. I have read the foregoing Report and I am informed and believe that the matters therein concerning PG&E are true. Therefore, I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at Oakland, California, on this 28th day of January 2025.

/S/

Sandra Cullings
Vice President, Portfolio and Program Management

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 12

ATTACHMENT B

MOBILE HOME PARK UTILITY UPGRADE PROGRAM

SUPPLEMENTAL INDIVIDUAL PROJECT AND

COST INFORMATION

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 12
ATTACHMENT B
MOBILE HOME PARK UTILITY UPGRADE PROGRAM
SUPPLEMENTAL INDIVIDUAL PROJECT AND
COST INFORMATION

TABLE OF CONTENTS

A. Section 1 – Description of Cost Types for MHP Conversion Projects 12-1

B. Section 2 – Description of Ongoing Non-Project Specific Costs..... 12-4

C. Section 3 – Individual Project and Cost Information 12-5

1. Project Name: Project 1 12-5
2. Project Name: Project 2 12-6
3. Project Name: Project 3 12-7
4. Project Name: Project 4 12-8
5. Project Name: Project 5 12-10
6. Project Name: Project 6 12-11
7. Project Name: Project 7 12-12
8. Project Name: Project 8 12-13
9. Project Name: Project 9 12-14
10. Project Name: Project 10 12-15
11. Project Name: Project 11 12-16
12. Project Name: Project 12 12-17
13. Project Name: Project 13 12-18
14. Project Name: Project 14 12-19
15. Project Name: Project 15 12-20
16. Project Name: Project 16 12-22
17. Project Name: Project 17 12-23
18. Project Name: Project 18 12-24
19. Project Name: Project 19 12-25

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 12
ATTACHMENT B
MOBILE HOME PARK UTILITY UPGRADE PROGRAM
SUPPLEMENTAL INDIVIDUAL PROJECT AND
COST INFORMATION

TABLE OF CONTENTS
(CONTINUED)

20. Project Name: Project 20 12-26
21. Project Name: Project 21 12-27
22. Project Name: Project 22 12-29
23. Project Name: Project 23 12-30
24. Project Name: Project 24 12-31
25. Project Name: Project 25 12-32
26. Project Name: Project 26 12-33
27. Project Name: Project 27 12-34
28. Project Name: Project 28 12-35
29. Project Name: Project 29 12-36
30. Project Name: Project 30 12-37
31. Project Name: Project 31 12-38
32. Project Name: Project 32 12-39
33. Project Name: Project 33 12-41
34. Project Name: Project 34 12-42
35. Project Name: Project 35 12-43
36. Project Name: Project 36 12-45
37. Project Name: Project 37 12-46
38. Project Name: Project 38 12-47
39. Project Name: Project 39 12-48
40. Project Name: Project 40 12-49
41. Project Name: Project 41 12-50

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 12
ATTACHMENT B
MOBILE HOME PARK UTILITY UPGRADE PROGRAM
SUPPLEMENTAL INDIVIDUAL PROJECT AND
COST INFORMATION

TABLE OF CONTENTS
(CONTINUED)

42. Project Name: Project 42 12-51
43. Project Name: Project 43 12-52
44. Project Name: Project 44 12-54
45. Project Name: Project 45 12-55
46. Project Name: Project 46 12-56
47. Project Name: Project 47 12-57
48. Project Name: Project 48 12-58
49. Project Name: Project 49 12-59
50. Project Name: Project 50 12-61
51. Project Name: Project 51 12-62
52. Project Name: Project 52 12-63
53. Project Name: Project 53 12-64
54. Project Name: Project 54 12-65
55. Project Name: Project 55 12-67
56. Project Name: Project 56 12-68
57. Project Name: Project 57 12-69
58. Project Name: Project 58 12-70

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 12
ATTACHMENT B
MOBILE HOME PARK UTILITY UPGRADE PROGRAM
SUPPLEMENTAL INDIVIDUAL PROJECT AND
COST INFORMATION

In this attachment, Pacific Gas and Electric Company (PG&E) describes project execution and costs incurred for the 58 mobile home park (MHP) conversions (fifteen gas-only conversions, three electric-only conversions and 40 combined gas and electric conversions) completed as of December 31, 2024. In total, for all 58 MHP conversions included in this report, PG&E on average underspent on the To-The-Meter (TTM) and Beyond-The-Meter (BTM) construction costs for the items identified in the Common Case Cost Estimate (CCCE) with escalation.

This document is organized as follows:

- Section 1: Describes the various cost types that were incurred in performing the MHP conversions.
- Section 2: Describes program start-up work and costs that are not specific to a particular MHP conversion.
- Section 3: Describes each individual, completed MHP conversion through December 31, 2024, including the work performed, challenges encountered, and costs incurred.

A. Section 1 – Description of Cost Types for MHP Conversion Projects

The following is a description of the various types of costs incurred in performing the MHP conversions.

TTM Construction

TTM Construction costs include costs for installation of gas pipes, electric conduit, electric cable, substructure work, meters, and associated meter protection, and restoration of the new gas and electric distribution system.

BTM Construction

BTM Construction costs include costs for necessary permits, as well as costs for installing the customer-owned meter pedestals, electric wiring, and gas piping to the point of service connection of each mobile home. Costs associated with BTM Construction are shown in line with the activities used to develop the

CCCE. PG&E was responsible for reviewing all BTM costs submitted for reimbursement. If the cost submitted for reimbursement was beyond the reference cost developed through the Mobile Home Program Agreement, PG&E would then request that the California Public Utilities Commission (Commission) Safety and Enforcement Division (SED) review and approve the cost prior to continuing the program with the MHP Owner.

CCEE

A CCCE was developed based on the designs of San Luis Rey Homes. The TTM and BTM costs are shown below along with their corresponding CCCE estimates. As part of the MHP Pilot Program, SED ranked projects as Category 1, 2 or 3 based on a determination of risk with Category 1 representing the highest risk projects and Category 3, the least. The CCCE was based on a Category 3 project. In contrast, the projects assigned to PG&E were Category 1 projects. As such, they present higher risks and challenges (such as existing leaks, unmarked subsurface infrastructure, and unique MHP layouts) not considered when developing the estimate.

In the MHP proceeding, CCCEs were developed by the Investor-Owned Utilities for the TTM and BTM Construction costs only. There were no CCCEs developed for the other cost categories discussed below.

Program Management

Activities associated with this cost type include the costs for the Program Management Office (PMO) to monitor and control the program and projects from initiation through completion. PG&E has not included cost estimates for program management in the CCCE. The PMO is an important component to the program as it is responsible for:

- Developing tools and procedures regarding TTM construction activities;
- Reviewing BTM reimbursements;
- Confirming the work is safely performed in accordance with PG&E standards; and
- Overseeing project scope, schedule, and budget.

Overhead

Overhead costs (i.e., Benefits, Payroll Taxes, Capitalized A&G, etc.) reflect the administrative and general costs incurred for PG&E to operate the MHP Program and are included in the total costs presented in this chapter.

Engineering Design

Activities associated with this cost type include engineering and designing the new distribution system that meets PG&E's codes and standards. In addition, PG&E is required to prepare and provide preliminary designs to MHP owners and to prepare all necessary land rights. PG&E does not traditionally provide internal designs to external parties for security reasons, therefore new design standards and processes were required to ensure only the appropriate information was provided.

Inspection

This includes the costs of overseeing critical tasks during TTM construction, coordinating the connection of the new distribution system, ensuring that the restoration is complete and the TTM construction completed meets PG&E standards.

Allowance for Funds Used During Construction

Allowance for Funds Used During Construction (AFUDC) is capitalized financing costs recorded during the period when new plant assets are being constructed. AFUDC ceases when the assets become operational. A project becomes operational when the asset is placed into operation and is providing service to customers (i.e., used, and useful). At PG&E, projects requiring over 30 days of construction will accrue AFUDC until they become operational. As the average construction duration of these completed MHP projects is over 30 days. AFUDC is accrued until the completion of the MHP conversion when the project starts to provide service to customers.

Support Organization Cost

This includes labor costs for supporting organizations. Some of the supporting organization functions include:

- Costs for the Sourcing Department to conduct Request for Proposals and Requests for Information so that the program can acquire sufficient resources to execute the program;
- The Land Department to develop required easement and land rights for the utility to construct and gain access for maintenance;
- The Environmental Services Department to conduct desktop reviews and necessary permits for construction; and
- Service Representatives to set gas and electric meters during cut over.

B. Section 2 – Description of Ongoing Non-Project Specific Costs

Ongoing Non-Project Specific Costs is based on ongoing efforts to maintain developed tools, updating processes and procedures, training, outreach, and cancelled projects. The nature of the activities and the costs incurred are shown in the table below.

TABLE 12B-1
ONGOING NON-PROJECT SPECIFIC COSTS
(THOUSANDS OF DOLLARS)

Line No.	Program Category	Description	Cost
1	PMO	Ongoing maintenance and development of program specific tools, processes, and procedures for implementing the program. Costs also incurred for activities to support RFIs, data requests and regulatory activities.	$846
2	Program Outreach	Labor and associated costs for community outreach and education efforts to provide timely information about the program to MHP Owners and MHP residents, local agencies, etc. The program outreach team is also responsible for assisting MHP residents sign up for new accounts with PG&E through the program and to ensure customers, through the MHP conversion program, receive "grandfathered" status consistent with PG&E's plan to waive the initial new customer credit check and service deposit at the time of cut over.	$1,122
3	Design Engineering	Ongoing training with EPC vendors on PG&E requirements and standards for the program regarding the design of new gas and/ or electric systems.	$115
4	Other Program Support	Labor cost from supporting organizations to conduct sourcing efforts for qualified contractors executing the program. As well as labor cost to work with local offices, such as public works, to obtain necessary approvals to conduct the program. Labor costs to acquire land rights, easements and, labor cost to perform desktop environmental review and cultural resources review of the proposed work at the MHPs.	–
5	Non-Labor	PG&E associated overhead costs pertaining to PG&E internal labor charges in the above categories.	$37
6	Cancelled Project Costs	Cancelled Project Costs from MHPs that have failed to complete the MHP agreement or have cancelled the project.	$159

C. Section 3 – Individual Project and Cost Information

1. Project Name: Project 1

- Project Scope: This project converted the MHP master meter system and installed 106 mobile home resident gas meters, 106 mobile home resident electric meters, and 2 additional gas meters and 0 additional electric meters to support common area (s). Total meters installed were 108 gas meters and 106 electric meters.

TABLE 12B-2
PROJECT 1 – HIGH-LEVEL STATISTICS

Line No.	High-Level Statistics	Electric	Gas
1	Number of Services	106	108
2	Average feet of trench/ space (LF)	70	70
3	Percentage of single commodity trench	4.4%	3.3%
4	Number of connections to the new system	1	2
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$523/ft	

- Unique Project Detail: This park operates as a dual commodity system. Its layout necessitated 350 feet of trenching exclusively for electric service and 260 feet for the gas main. Additionally, extended services and associated trenching were required for common areas.

TABLE 12B-3
PROJECT 1 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$6,043,599.00
Project Completion Cost	$4,108,257.10

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$38,039.42	$6,660
Program Management	Not in Estimate	Not in Estimate	$2,587.45	N/A
Overhead	Not in Estimate	Not in Estimate	$1,228.48	N/A
Engineering Design	Not in Estimate	Not in Estimate	$43.36	N/A
Inspection	Not in Estimate	Not in Estimate	$2,673.85	N/A
AFUDC	Not in Estimate	Not in Estimate	$732.50	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$534.63	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

2. Project Name: Project 2

- Project Scope: This project converted the MHP master meter system and installed 25 mobile home resident gas meters, 25 mobile home resident electric meters, and 1 additional gas meters and 0 additional electric meters to support common area (s). 26 gas meters and 25 electric meters were installed in total.

TABLE 12B-4
PROJECT 2 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	25	26
2	Average feet of trench/ space (LF)	37	38
3	Percentage of single commodity trench	6.6%	9.1%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$1,028/ft	

- Unique Project Detail: This park had a greater utility clearance requirements by local jurisdiction than normal. The local jurisdiction required new utilities to be intalled at a depth of five feet. Subsequently, bellholes and trenches had to be deeper and outside the standard size.

TABLE 12B-5
PROJECT 2 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$1,512,521.00
Project Completion Cost	$1,094,901.45

	Common Case Estimate/ Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$42,111.59	$10,732
Program Management	Not in Estimate	Not in Estimate	$508.14	N/A
Overhead	Not in Estimate	Not in Estimate	$6,587.14	N/A
Engineering Design	Not in Estimate	Not in Estimate	$308.82	N/A
Inspection	Not in Estimate	Not in Estimate	$5,316.36	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,300.55	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$3,378.41	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

3. Project Name: Project 3

- Project Scope: This project converted the MHP master meter system and installed 5 mobile home resident gas meters, 0 mobile home resident electric meters, and 0 additional gas meters and 0 additional electric meters to support common area (s). 5 gas meters and 0 electric meters were installed in total.

TABLE 12B-6
PROJECT 3 – HIGH-LEVEL STATISTICS
(THOUSANDS OF DOLLARS)

Line No.	High level Statistics	Electric	Gas
1	Number of Services	0	5
2	Average feet of trench/ space (LF)	0	78
3	Percentage of single commodity trench	0.0%	100.0%
4	Number of connections to the new system	0	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$786/ft	

- Unique Project Detail: The existing four inch plastic gas main at the gas tie-in location was shallower than the records showed. Due to requirements of the tie-in, additional materials and labor were required at and a concrete cap with sand was required for additional protection.

TABLE 12B-7
PROJECT 3 – HIGH-LEVEL STATISTICS

	Total
Project Estimate	$408,809.00
Project Completion Cost	$307,255.69

	Common Case Estimate/ Space (Filed in 2012)	Common Case Estimate/ Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$61,451.14	$30,072
Program Management	Not in Estimate	Not in Estimate	$871.07	N/A
Overhead	Not in Estimate	Not in Estimate	$18,507.67	N/A
Engineering Design	Not in Estimate	Not in Estimate	$1,285.47	N/A
Inspection	Not in Estimate	Not in Estimate	$5,927.91	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,031.24	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$9,037.97	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

4. Project Name: Project 4

- Project Scope: This project converted the MHP master meter system and installed 58 mobile home resident gas meters, 0 mobile home resident electric meters, and 1 additional gas meters and 0 additional electric meters to support common area (s). 59 gas meters and 0 electric meters were installed in total.

TABLE 12B-8
PROJECT 4 – PROJECT COST
(THOUSANDS OF DOLLARS)

Line No.	High level Statistics	Electric	Gas
1	Number of Services	0	59
2	Average feet of trench/ space (LF)	0	41
3	Percentage of single commodity trench	0.0%	100.0%
4	Number of connections to the new system	0	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$469/ft	

- Unique Project Detail: Prior to construction, the MHP ownership installed new water and sewer lines and did not communicate this to the PG&E project team. This lead to redesign costs incurred. Assets to be installed needed to go deeper to maintain proper clearances from the wet utilities (i.e., from three to six feet deep).

TABLE 12B-9
PROJECT 4 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$2,268,095.00
Project Completion Cost	$1,144,701.69

	Common Case Estimate/ Space (Filed in 2012)	Common Case Estimate/ Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$19,401.72	$(11,977)
Program Management	Not in Estimate	Not in Estimate	$657.05	N/A
Overhead	Not in Estimate	Not in Estimate	$3,165.77	N/A
Engineering Design	Not in Estimate	Not in Estimate	$65.07	N/A
Inspection	Not in Estimate	Not in Estimate	$1,147.52	N/A
AFUDC	Not in Estimate	Not in Estimate	$140.40	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$1,758.91	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

5. Project Name: Project 5

- Project Scope: This project converted the MHP master meter system and installed 61 mobile home resident gas meters, 0 mobile home resident electric meters, and 2 additional gas meters and 0 additional electric meters to support common area (s). 63 gas meters and 0 electric meters were installed in total.

TABLE 12B-10
PROJECT 5 – HIGH-LEVEL STATISTICS
(THOUSANDS OF DOLLARS)

Line No.	High level Statistics	Electric	Gas
1	Number of Services	0	63
2	Average feet of trench/ space (LF)	0	46
3	Percentage of single commodity trench	0.0%	100.0%
4	Number of connections to the new system	0	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$442/ft	

- Unique Project Detail: This park had various homes that were set up on the outskirts of the park in a non-grid like pattern. This caused an additional 200 feet of mainline to be extended to reach those homes.

TABLE 12B-11
PROJECT 5 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$2,350,111.00
Project Completion Cost	$1,285,089.53

	Common Case Estimate/ Space (Filed in 2012)	Common Case Estimate/ Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$20,398.25	$(10,981)
Program Management	Not in Estimate	Not in Estimate	$844.54	N/A
Overhead	Not in Estimate	Not in Estimate	$2,461.67	N/A
Engineering Design	Not in Estimate	Not in Estimate	$119.99	N/A
Inspection	Not in Estimate	Not in Estimate	$1,432.38	N/A
AFUDC	Not in Estimate	Not in Estimate	$213.19	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$1,277.91	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

6. Project Name: Project 6

- Project Scope: This project converted the MHP master meter system and installed 21 mobile home resident gas meters, 21 mobile home resident electric meters, and 1 additional gas meters and 0 additional electric meters to support common area (s). 22 gas meters and 21 electric meters were installed in total.

TABLE 12B-12
PROJECT 6 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	21	22
2	Average feet of trench/ space (LF)	51	46
3	Percentage of single commodity trench	14.9%	5.3%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	1
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$683/ft	

- Unique Project Detail: Due to the park's location and layout, the mainline was installed with services only on one side, resulting in two dead ends and requiring extended service lengths for mobile homes.

TABLE 12B-13
PROJECT 6 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$1,275,990.00
Project Completion Cost	$809,457.02

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$36,793.50	$5,414
Program Management	Not in Estimate	Not in Estimate	$3,556.54	N/A
Overhead	Not in Estimate	Not in Estimate	$1,824.48	N/A
Engineering Design	Not in Estimate	Not in Estimate	$152.97	N/A
Inspection	Not in Estimate	Not in Estimate	$3,168.48	N/A
AFUDC	Not in Estimate	Not in Estimate	$496.20	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$770.74	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

7. Project Name: Project 7

- Project Scope: This project converted the MHP master meter system and installed 141 mobile home resident gas meters, 141 mobile home resident electric meters, and 1 additional gas meters and 0 additional electric meters to support common area (s). 142 gas meters and 141 electric meters were installed in total.

TABLE 12B-14
PROJECT 7 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	141	142
2	Average feet of trench/ space (LF)	77	74
3	Percentage of single commodity trench	10.1%	6.6%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$616/ft	

- Unique Project Detail: During construction, the crew encountered hard rock that required drilling to proceed with asset installation. This unexpected condition led to additional time and labor being needed to complete the work. Due to the park's location and layout, the mainline was installed with services only on one side, and requiring extended service lengths for mobile homes.

TABLE 12B-15
PROJECT 7 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$8,081,534.00
Project Completion Cost	$7,177,760.87

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$50,547.61	$19,169
Program Management	Not in Estimate	Not in Estimate	$3,450.44	N/A
Overhead	Not in Estimate	Not in Estimate	$1,496.05	N/A
Engineering Design	Not in Estimate	Not in Estimate	$119.14	N/A
Inspection	Not in Estimate	Not in Estimate	$4,313.80	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,478.67	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$1,078.94	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

8. Project Name: Project 8

- Project Scope: This project converted the MHP master meter system and installed 134 mobile home resident gas meters, 134 mobile home resident electric meters, and 2 additional gas meters and 0 additional electric meters to support common area (s). 136 gas meters and 134 electric meters were installed in total.

TABLE 12B-16
PROJECT 8 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	134	136
2	Average feet of trench/ space (LF)	57	55
3	Percentage of single commodity trench	6.0%	3.6%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$602/ft	

- Unique Project Detail: This park operates as a dual commodity system, requiring 480 feet of trenching exclusively for electric service and 285 feet for gas service due to its layout.

TABLE 12B-17
PROJECT 8 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$7,429,711.00
Project Completion Cost	$4,796,784.63

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$35,270.48	$3,891
Program Management	Not in Estimate	Not in Estimate	$953.73	N/A
Overhead	Not in Estimate	Not in Estimate	$1,528.02	N/A
Engineering Design	Not in Estimate	Not in Estimate	$44.37	N/A
Inspection	Not in Estimate	Not in Estimate	$2,622.55	N/A
AFUDC	Not in Estimate	Not in Estimate	$679.52	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$691.24	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

9. Project Name: Project 9

- Project Scope: This project converted the MHP master meter system and installed 348 mobile home resident gas meters, 0 mobile home resident electric meters, and 2 additional gas meters and 0 additional electric meters to support common area (s). 350 gas meters and 0 electric meters were installed in total.

TABLE 12B-18
PROJECT 9 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	0	350
2	Average feet of trench/ space (LF)	0	53
3	Percentage of single commodity trench	0.0%	100.0%
4	Number of connections to the new system	0	2
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$386/ft	

- Unique Project Detail: This park is gas-only park and extensive gas mainline was installed due to layout of the park. The project costs were consistent with those of comparable mobile home parks.

TABLE 12B-19
PROJECT 9 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$12,047,866.00
Project Completion Cost	$7,216,283.51

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$20,617.95	$(10,761)
Program Management	Not in Estimate	Not in Estimate	$817.31	N/A
Overhead	Not in Estimate	Not in Estimate	$588.63	N/A
Engineering Design	Not in Estimate	Not in Estimate	$34.77	N/A
Inspection	Not in Estimate	Not in Estimate	$1,216.70	N/A
AFUDC	Not in Estimate	Not in Estimate	$129.00	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$277.99	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

10. Project Name: Project 10

- Project Scope: This project converted the MHP master meter system and installed 28 mobile home resident gas meters, 0 mobile home resident electric meters, and 0 additional gas meters and 0 additional electric meters to support common area (s). 28 gas meters and 0 electric meters were installed in total.

TABLE 12B-20
PROJECT 10 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	0	28
2	Average feet of trench/ space (LF)	0	39
3	Percentage of single commodity trench	0.0%	100.0%
4	Number of connections to the new system	0	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$517/ft	

- Unique Project Detail: Project had multiple tie-ins due to the layout of the park. Additionally, cost savings were found by pairing and branching six mobile home lots.

TABLE 12B-21
PROJECT 10 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$1,162,406.00
Project Completion Cost	$561,892.95

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$20,067.61	$(11,311)
Program Management	Not in Estimate	Not in Estimate	$885.44	N/A
Overhead	Not in Estimate	Not in Estimate	$853.75	N/A
Engineering Design	Not in Estimate	Not in Estimate	$76.93	N/A
Inspection	Not in Estimate	Not in Estimate	$1,355.99	N/A
AFUDC	Not in Estimate	Not in Estimate	$68.59	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$290.55	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

11. Project Name: Project 11

- Project Scope: This project converted the MHP master meter system and installed 136 mobile home resident gas meters, 0 mobile home resident electric meters, and 1 additional gas meters and 0 additional electric meters to support common area (s). 137 gas meters and 0 electric meters were installed in total.

TABLE 12B-22
PROJECT 11 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	0	137
2	Average feet of trench/ space (LF)	0	61
3	Percentage of single commodity trench	0.0%	100.0%
4	Number of connections to the new system	0	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$359/ft	

- Unique Project Detail: This park is a gas-only park and extensive gas mainline was installed due to layout of park. The project costs were consistent with those of comparable mobile home parks.

TABLE 12B-23
PROJECT 11 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$5,550,081.00
Project Completion Cost	$3,011,718.35

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$21,983.35	$(9,396)
Program Management	Not in Estimate	Not in Estimate	$782.46	N/A
Overhead	Not in Estimate	Not in Estimate	$808.66	N/A
Engineering Design	Not in Estimate	Not in Estimate	$43.65	N/A
Inspection	Not in Estimate	Not in Estimate	$1,071.77	N/A
AFUDC	Not in Estimate	Not in Estimate	$326.40	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$343.97	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

12. Project Name: Project 12

- Project Scope: This project converted the MHP master meter system and installed 230 mobile home resident gas meters, 230 mobile home resident electric meters, and 1 additional gas meters and 0 additional electric meters to support common area (s). 231 gas meters and 230 electric meters were installed in total.

TABLE 12B-24
PROJECT 12 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	230	231
2	Average feet of trench/ space (LF)	59	59
3	Percentage of single commodity trench	0.0%	0.0%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$631/ft	

- Unique Project Detail: This park operates as a dual commodity system and there were unique challenges inherent in crossing a Caltrans right of way. This project incurred more costs than usual due to the unique challenges inherent in crossing a Caltrans right of way .

TABLE 12B-25
PROJECT 12 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$13,432,540.00
Project Completion Cost	$8,558,217.86

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$37,048.56	$5,669
Program Management	Not in Estimate	Not in Estimate	$2,026.54	N/A
Overhead	Not in Estimate	Not in Estimate	$1,412.86	N/A
Engineering Design	Not in Estimate	Not in Estimate	$70.59	N/A
Inspection	Not in Estimate	Not in Estimate	$3,806.23	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,058.75	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$644.95	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

13. Project Name: Project 13

- Project Scope: This project converted the MHP master meter system and installed 17 mobile home resident gas meters, 0 mobile home resident electric meters, and 0 additional gas meters and 0 additional electric meters to support common area (s). 17 gas meters and 0 electric meters were installed in total.

TABLE 12B-26
PROJECT 13 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	0	17
2	Average feet of trench/ space (LF)	0	56
3	Percentage of single commodity trench	0.0%	100.0%
4	Number of connections to the new system	0	1
5	Gas Leaks	N/A	4
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$649/ft	

- Unique Project Detail: This is a gas-only park, and due to its layout and geographic location, only 200 feet of mainline trenching was required, with no service connections. Additionally, the mainline had to be

repositioned to one side after unexpected leach lines were discovered during trenching.

TABLE 12B-27
PROJECT 13 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$1,385,947.00
Project Completion Cost	$612,282.82

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$36,016.64	$4,638
Program Management	Not in Estimate	Not in Estimate	$1,202.02	N/A
Overhead	Not in Estimate	Not in Estimate	$3,421.59	N/A
Engineering Design	Not in Estimate	Not in Estimate	$279.73	N/A
Inspection	Not in Estimate	Not in Estimate	$3,519.54	N/A
AFUDC	Not in Estimate	Not in Estimate	$458.40	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$1,791.37	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

14. Project Name: Project 14

- Project Scope: This project converted the MHP master meter system and installed 208 mobile home resident gas meters, 208 mobile home resident electric meters, and 1 additional gas meters and 0 additional electric meters to support common area (s). 209 gas meters and 208 electric meters were installed in total.

TABLE 12B-28
PROJECT 14 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	208	209
2	Average feet of trench/ space (LF)	64	62
3	Percentage of single commodity trench	4.6%	1.0%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	56
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$585/ft	

- Unique Project Detail: Due to the park's layout, multiple cul-de-sacs required extensive mainline installation on one side of the street. Additionally, 620 feet of trenching was needed exclusively for electric service.

TABLE 12B-29
PROJECT 14 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$9,906,950.00
Project Completion Cost	$7,877,182.83

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$37,689.87	$6,311
Program Management	Not in Estimate	Not in Estimate	$2,544.86	N/A
Overhead	Not in Estimate	Not in Estimate	$1,048.71	N/A
Engineering Design	Not in Estimate	Not in Estimate	$38.44	N/A
Inspection	Not in Estimate	Not in Estimate	$2,597.69	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,167.49	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$427.42	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

15. Project Name: Project 15

- Project Scope: This project converted the MHP master meter system and installed 188 mobile home resident gas meters, 188 mobile home resident electric meters, and 4 additional gas meters and 0 additional electric meters to support common area (s). Total meters installed were 192 gas meters and 188 electric meters.

TABLE 12B-30
PROJECT 15 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	188	192
2	Average feet of trench/ space (LF)	47	49
3	Percentage of single commodity trench	0.0%	3.7%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	31
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$607/ft	

- Unique Project Detail: Due to project layout, there is approximately 1,767 ft of trench where only one side of the trench is utilized to serve homes. There is also an additional 129 ft of unused main that connects the tie-in locatin to the first homes served. Existing infrastructure also necessitated PG&E to perform cutoffs at three separate locations.

TABLE 12B-31
PROJECT 15 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$9,002,761.00
Project Completion Cost	$5,705,824.53

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$29,717.84	$(1,661)
Program Management	Not in Estimate	Not in Estimate	$1,616.77	N/A
Overhead	Not in Estimate	Not in Estimate	$1,105.28	N/A
Engineering Design	Not in Estimate	Not in Estimate	$22.27	N/A
Inspection	Not in Estimate	Not in Estimate	$2,128.29	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,014.29	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$550.76	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

16. Project Name: Project 16

- Project Scope: This project converted the MHP master meter system and installed 282 mobile home resident gas meters, 282 mobile home resident electric meters, and 3 additional gas meters and 0 additional electric meters to support common area (s). 285 gas meters and 282 electric meters were installed in total.

TABLE 12B-32
PROJECT 16 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	282	285
2	Average feet of trench/ space (LF)	52	53
3	Percentage of single commodity trench	3.5%	5.8%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	38
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$612/ft	

- Unique Project Detail: Due to the park's layout, 550 feet of trenching was required exclusively for electric and 910 feet for gas. Additionally, the local jurisdiction mandated additional restoration per its guidelines, which exceeded standard practice

TABLE 12B-33
PROJECT 16 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$16,419,945.00
Project Completion Cost	$9,599,535.70

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$33,682.58	$2,303
Program Management	Not in Estimate	Not in Estimate	$2,104.05	N/A
Overhead	Not in Estimate	Not in Estimate	$1,195.11	N/A
Engineering Design	Not in Estimate	Not in Estimate	$17.93	N/A
Inspection	Not in Estimate	Not in Estimate	$2,620.47	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,480.33	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$588.86	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

17. Project Name: Project 17

- Project Scope: This project converted the MHP master meter system and installed 196 mobile home resident gas meters, 196 mobile home resident electric meters, and 2 additional gas meters and 0 additional electric meters to support common area (s). 198 gas meters and 196 electric meters were installed in total.

TABLE 12B-34
PROJECT 17 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	196	198
2	Average feet of trench/ space (LF)	63	61
3	Percentage of single commodity trench	8.7%	6.6%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	58
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$559/ft	

- Unique Project Detail: Due to project layout, there is approximately 1,833 ft of trench where either only one side of the trench is utilized to serve homes or very few homes are actually served. Additionally, the City required the installation of seismic valves at meter locations which incurred additional costs.

TABLE 12B-35
PROJECT 17 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$11,674,854.00
Project Completion Cost	$7,439,926.63

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$37,575.39	$6,196
Program Management	Not in Estimate	Not in Estimate	$1,897.25	N/A
Overhead	Not in Estimate	Not in Estimate	$1,349.42	N/A
Engineering Design	Not in Estimate	Not in Estimate	$43.66	N/A
Inspection	Not in Estimate	Not in Estimate	$3,272.68	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,514.38	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$820.05	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

18. Project Name: Project 18

- Project Scope: This project converted the MHP master meter system and installed 165 mobile home resident gas meters, 165 mobile home resident electric meters, and 3 additional gas meters and 0 additional electric meters to support common area (s). 168 gas meters and 165 electric meters were installed in total.

TABLE 12B-36
PROJECT 18 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	165	168
2	Average feet of trench/ space (LF)	61	65
3	Percentage of single commodity trench	4.4%	9.8%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	18
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$571/ft	

- Unique Project Detail: The layout of this park is not in a grid pattern and has a land feature in the middle of the park. Due to this, there is approximately 2,280 ft of trench where either only one side of the trench is utilized to serve homes or very few homes are actually served. In

addition, rocky soil was found at the park necessitating additional off haul and back fill costs.

TABLE 12B-37
PROJECT 18 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$9,332,063.00
Project Completion Cost	$6,477,415.98

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$38,556.05	$7,177
Program Management	Not in Estimate	Not in Estimate	$1,721.77	N/A
Overhead	Not in Estimate	Not in Estimate	$1,696.96	N/A
Engineering Design	Not in Estimate	Not in Estimate	$54.44	N/A
Inspection	Not in Estimate	Not in Estimate	$2,310.12	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,230.56	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$839.40	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

19. Project Name: Project 19

- Project Scope: This project converted the MHP master meter system and installed 271 mobile home resident gas meters, 271 mobile home resident electric meters, and 2 additional gas meters and 4 additional electric meters to support common area (s). 273 gas meters and 275 electric meters were installed in total.

TABLE 12B-38
PROJECT 19 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	275	273
2	Average feet of trench/ space (LF)	58	61
3	Percentage of single commodity trench	1.6%	5.8%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	49
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$599/ft	

- Unique Project Detail: Due to depth of existing utilities inside the park, trenching needed to be deeper than 30 inches to meet separation requirements. Due to the depth of existing utilities within the park, trenching had to exceed 30 inches to meet separation requirements. Additionally, the project faced higher costs due to existing site conditions, requiring asphalt restoration at a thickness of six inches throughout the park's layout.

TABLE 12B-39
PROJECT 19 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$16,031,041.00
Project Completion Cost	$10,148,432.91

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$36,903.39	$5,524
Program Management	Not in Estimate	Not in Estimate	$1,379.76	N/A
Overhead	Not in Estimate	Not in Estimate	$1,373.00	N/A
Engineering Design	Not in Estimate	Not in Estimate	$43.71	N/A
Inspection	Not in Estimate	Not in Estimate	$2,514.86	N/A
AFUDC	Not in Estimate	Not in Estimate	$956.64	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$788.27	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

20. Project Name: Project 20

- Project Scope: This project converted the MHP master meter system and installed 163 mobile home resident gas meters, 163 mobile home resident electric meters, and 2 additional gas meters and 0 additional electric meters to support common area (s). 165 gas meters and 163 electric meters were installed in total.

TABLE 12B-40
PROJECT 20 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	163	165
2	Average feet of trench/ space (LF)	56	53
3	Percentage of single commodity trench	7.1%	2.5%
4	Number of connections to the new system	2	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$595/ft	

- Unique Project Detail: This park operates as a dual commodity system, requiring 665 feet of trenching exclusively for electric and 235 feet for gas due to its layout.

TABLE 12B-41
PROJECT 20 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$9,641,432.00
Project Completion Cost	$5,591,183.03

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$33,885.96	$2,507
Program Management	Not in Estimate	Not in Estimate	$1,566.94	N/A
Overhead	Not in Estimate	Not in Estimate	$1,443.84	N/A
Engineering Design	Not in Estimate	Not in Estimate	$55.28	N/A
Inspection	Not in Estimate	Not in Estimate	$2,686.28	N/A
AFUDC	Not in Estimate	Not in Estimate	$467.58	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$635.91	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

21. Project Name: Project 21

- Project Scope: This project converted the MHP master meter system and installed 118 mobile home resident gas meters, 118 mobile home resident electric meters, and 2 additional gas meters and 2 additional electric meters to support common area (s). 120 gas meters and 120 electric meters were installed in total.

TABLE 12B-42
PROJECT 21 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	120	120
2	Average feet of trench/ space (LF)	60	56
3	Percentage of single commodity trench	12.2%	6.2%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	4
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$547/ft	

- Unique Project Detail: This park operates as a dual commodity system, requiring 940 feet of trenching exclusively for electric and 475 feet for gas. Due to its layout, the mainline had to be installed on one side. Additionally, the park had unique challenges associated with Caltrans requiring the removal of the abandoned master meter service.

TABLE 12B-43
PROJECT 21 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$6,675,692.00
Project Completion Cost	$4,204,319.19

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$35,035.99	$3,657
Program Management	Not in Estimate	Not in Estimate	$2,073.98	N/A
Overhead	Not in Estimate	Not in Estimate	$1,068.71	N/A
Engineering Design	Not in Estimate	Not in Estimate	$38.66	N/A
Inspection	Not in Estimate	Not in Estimate	$2,663.06	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,921.88	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$633.33	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

22. Project Name: Project 22

- Project Scope: This project converted the MHP master meter system and installed 122 mobile home resident gas meters, 122 mobile home resident electric meters, and 2 additional gas meters and 0 additional electric meters to support common area (s). 124 gas meters and 122 electric meters were installed in total.

TABLE 12B-44
PROJECT 22 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	122	124
2	Average feet of trench/ space (LF)	62	62
3	Percentage of single commodity trench	5.5%	6.0%
4	Number of connections to the new system	2	1
5	Gas Leaks	N/A	14
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$563/ft	

- Unique Project Detail: Due to the park's layout, extensive mainline installation was required before reaching the mobile homes. Additionally, 2,500 feet of mainline was installed, with services provided only on one.

TABLE 12B-45
PROJECT 22 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$6,948,997.00
Project Completion Cost	$4,607,761.09

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$37,159.36	$5,780
Program Management	Not in Estimate	Not in Estimate	$757.94	N/A
Overhead	Not in Estimate	Not in Estimate	$1,437.22	N/A
Engineering Design	Not in Estimate	Not in Estimate	$47.77	N/A
Inspection	Not in Estimate	Not in Estimate	$2,763.37	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,277.13	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$671.70	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

23. Project Name: Project 23

- Project Scope: This project converted the MHP master meter system and installed 33 mobile home resident gas meters, 33 mobile home resident electric meters, and 0 additional gas meters and 0 additional electric meters to support common area (s). Total meters installed were 33 gas meters and 33 electric meters.

TABLE 12B-46
PROJECT 23 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	33	33
2	Average feet of trench/ space (LF)	69	69
3	Percentage of single commodity trench	7.3%	7.0%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	5
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$660/ft	

- Unique Project Detail: This park is dual comodity due to location and layout of park extensive electric mainline was installed duto provide a primary electric line to this park. This required wider trench than normal and required additional excavation and restoration in those areas.

TABLE 12B-47
PROJECT 23 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$2,205,055.00
Project Completion Cost	$1,618,153.93

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$49,034.97	$17,656
Program Management	Not in Estimate	Not in Estimate	$1,323.88	N/A
Overhead	Not in Estimate	Not in Estimate	$3,724.27	N/A
Engineering Design	Not in Estimate	Not in Estimate	$188.28	N/A
Inspection	Not in Estimate	Not in Estimate	$4,529.40	N/A
AFUDC	Not in Estimate	Not in Estimate	$793.95	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$2,945.74	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

24. Project Name: Project 24

- Project Scope: This project converted the MHP master meter system and installed 85 mobile home resident gas meters, 85 mobile home resident electric meters, and 3 additional gas meters and 0 additional electric meters to support common area (s). 88 gas meters and 85 electric meters were installed in total.

TABLE 12B-48
PROJECT 24 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	85	88
2	Average feet of trench/ space (LF)	51	50
3	Percentage of single commodity trench	6.9%	5.1%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$657/ft	

- Unique Project Detail: This park is dual commodity and extensive gas and electric mainline/services were installed due to the layout of the park.

TABLE 12B-49
PROJECT 24 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$4,686,552.00
Project Completion Cost	$3,116,639.85

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$35,416.36	$4,037
Program Management	Not in Estimate	Not in Estimate	$1,077.68	N/A
Overhead	Not in Estimate	Not in Estimate	$2,258.92	N/A
Engineering Design	Not in Estimate	Not in Estimate	$60.61	N/A
Inspection	Not in Estimate	Not in Estimate	$2,696.65	N/A
AFUDC	Not in Estimate	Not in Estimate	$700.34	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$1,218.82	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

25. Project Name: Project 25

- Project Scope: This project converted the MHP master meter system and installed 117 mobile home resident gas meters, 117 mobile home resident electric meters, and 1 additional gas meters and 0 additional electric meters to support common area (s). 118 gas meters and 117 electric meters were installed in total.

TABLE 12B-50
PROJECT 25 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	117	118
2	Average feet of trench/ space (LF)	62	62
3	Percentage of single commodity trench	7.7%	8.3%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$583/ft	

- Unique Project Detail: Due to the park's unique layout and site conditions, additional restoration efforts were necessary. Many mobile homes featured brick planters, requiring extra labor for removal and restoration to ensure proper installation of utilities while preserving the area's original aesthetics. Additionally, a substantial length of gas mainline had to be installed outside the park for tie-in before extending into the mobile home park. The cost of this project rose significantly due to electric pedestal delivery delays during the COVID-19 pandemic.

TABLE 12B-51
PROJECT 25 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$6,554,789.00
Project Completion Cost	$4,648,926.71

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$39,397.68	$8,019
Program Management	Not in Estimate	Not in Estimate	$2,152.91	N/A
Overhead	Not in Estimate	Not in Estimate	$1,612.67	N/A
Engineering Design	Not in Estimate	Not in Estimate	$72.88	N/A
Inspection	Not in Estimate	Not in Estimate	$2,708.04	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,847.35	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$752.76	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

26. Project Name: Project 26

- Project Scope: This project converted the MHP master meter system and installed 49 mobile home resident gas meters, 49 mobile home resident electric meters, and 2 additional gas meters and 0 additional electric meters to support common area (s). 51 gas meters and 49 electric meters were installed in total.

TABLE 12B-52
PROJECT 26 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	49	51
2	Average feet of trench/ space (LF)	52	57
3	Percentage of single commodity trench	8.5%	16.9%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$537/ft	

- Unique Project Detail: This park is dual commodity and extensive gas and electric mainlines, as well as two separate tie-ins was installed due to the layout of the park.

TABLE 12B-53
PROJECT 26 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$2,744,740.00
Project Completion Cost	$1,700,650.86

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$33,346.10	$1,967
Program Management	Not in Estimate	Not in Estimate	$1,635.71	N/A
Overhead	Not in Estimate	Not in Estimate	$1,087.44	N/A
Engineering Design	Not in Estimate	Not in Estimate	$68.40	N/A
Inspection	Not in Estimate	Not in Estimate	$3,352.61	N/A
AFUDC	Not in Estimate	Not in Estimate	$361.69	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$881.08	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

27. Project Name: Project 27

- Project Scope: This project converted the MHP master meter system and installed 218 mobile home resident gas meters, 218 mobile home resident electric meters, and 5 additional gas meters and 1 additional electric meters to support common area (s). 223 gas meters and 219 electric meters were installed in total.

TABLE 12B-54
PROJECT 27 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	219	223
2	Average feet of trench/ space (LF)	58	54
3	Percentage of single commodity trench	18.1%	12.0%
4	Number of connections to the new system	2	2
5	Gas Leaks	N/A	16
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$517/ft	

- Unique Project Detail: Due to the park's layout, 2,000 feet of trenching was required exclusively for electric and 1,500 feet for gas.

TABLE 12B-55
PROJECT 27 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$11,951,464.00
Project Completion Cost	$7,672,479.55

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$34,405.74	$3,027
Program Management	Not in Estimate	Not in Estimate	$1,014.03	N/A
Overhead	Not in Estimate	Not in Estimate	$1,034.89	N/A
Engineering Design	Not in Estimate	Not in Estimate	$40.68	N/A
Inspection	Not in Estimate	Not in Estimate	$2,463.05	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,056.88	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$517.73	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

28. Project Name: Project 28

- Project Scope: This project converted the MHP master meter system and installed 14 mobile home resident gas meters, 14 mobile home resident electric meters, and 1 additional gas meters and 1 additional electric meters to support common area (s). 15 gas meters and 15 electric meters were installed in total.

TABLE 12B-56
PROJECT 28 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	15	15
2	Average feet of trench/ space (LF)	58	58
3	Percentage of single commodity trench	0.0%	0.0%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	1
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$712/ft	

- Unique Project Detail: This park operates dual commodity systems. Due to its unique layout, all services are supplied from one side of the mainline.

TABLE 12B-57
PROJECT 28 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$818,584.00
Project Completion Cost	$614,502.75

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$40,966.85	$9,588
Program Management	Not in Estimate	Not in Estimate	$7,524.66	N/A
Overhead	Not in Estimate	Not in Estimate	$2,703.41	N/A
Engineering Design	Not in Estimate	Not in Estimate	$489.23	N/A
Inspection	Not in Estimate	Not in Estimate	$1,366.40	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,420.37	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$903.44	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

29. Project Name: Project 29

- Project Scope: This project converted the MHP master meter system and installed 0 mobile home resident gas meters, 80 mobile home resident electric meters, and 0 additional gas meters and 2 additional electric meters to support common area (s). Total meters installed: 0 gas meters and 82 electric meters.

TABLE 12B-58
PROJECT 29 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	82	0
2	Average feet of trench/ space (LF)	26	0
3	Percentage of single commodity trench	100.0%	0.0%
4	Number of connections to the new system	1	0
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$751/ft	

- Unique Project Detail: This park is electric only and extensive electric mainline was installed due to layout of park.

TABLE 12B-59
PROJECT 29 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$2,953,225.00
Project Completion Cost	$1,587,598.26

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$19,360.95	$(12,018)
Program Management	Not in Estimate	Not in Estimate	$2,228.36	N/A
Overhead	Not in Estimate	Not in Estimate	$122.76	N/A
Engineering Design	Not in Estimate	Not in Estimate	$30.08	N/A
Inspection	Not in Estimate	Not in Estimate	$1,228.82	N/A
AFUDC	Not in Estimate	Not in Estimate	$272.00	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$28.49	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

30. Project Name: Project 30

- Project Scope: This project converted the MHP master meter system and installed 0 mobile home resident gas meters, 48 mobile home resident electric meters, and 0 additional gas meters and 2 additional electric meters to support common area (s). Total meters installed: 0 gas meters and 50 electric meters.

TABLE 12B-60
PROJECT 30 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	50	0
2	Average feet of trench/ space (LF)	43	0
3	Percentage of single commodity trench	100.0%	0.0%
4	Number of connections to the new system	1	0
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$581/ft	

- Unique Project Detail: This park is electric only and extensive electric mainline was installed due to layout of park.

TABLE 12B-61
PROJECT 30 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$2,050,270.00
Project Completion Cost	$1,236,558.35

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$24,731.17	$(6,648)
Program Management	Not in Estimate	Not in Estimate	$1,957.67	N/A
Overhead	Not in Estimate	Not in Estimate	$482.08	N/A
Engineering Design	Not in Estimate	Not in Estimate	$0.00	N/A
Inspection	Not in Estimate	Not in Estimate	$1,725.38	N/A
AFUDC	Not in Estimate	Not in Estimate	$355.19	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$216.60	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

31. Project Name: Project 31

- Project Scope: This project converted the MHP master meter system and installed 50 mobile home resident gas meters, 50 mobile home resident electric meters, and 1 additional gas meters and 1 additional electric meters to support common area (s). 51 gas meters and 51 electric meters were installed in total.

TABLE 12B-62
PROJECT 31 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	51	51
2	Average feet of trench/ space (LF)	57	57
3	Percentage of single commodity trench	0.0%	0.0%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$706/ft	

- Unique Project Detail: The project incurred additional costs due to hard roc discovered during construction and the construction crew required additional resources to install electric and gas mainline. Due to park layout, extensive mainline was installed that had few service being supplied.

TABLE 12B-63
PROJECT 31 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$3,002,470.00
Project Completion Cost	$2,038,809.76

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$39,976.66	$8,598
Program Management	Not in Estimate	Not in Estimate	$3,899.87	N/A
Overhead	Not in Estimate	Not in Estimate	$998.46	N/A
Engineering Design	Not in Estimate	Not in Estimate	$125.15	N/A
Inspection	Not in Estimate	Not in Estimate	$3,230.01	N/A
AFUDC	Not in Estimate	Not in Estimate	$803.68	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$368.77	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

32. Project Name: Project 32

- Project Scope: This project converted the MHP master meter system and installed 74 mobile home resident gas meters, 0 mobile home resident electric meters, and 2 additional gas meters and 0 additional electric meters to support common area (s). 76 gas meters and 0 electric meters were installed in total.

TABLE 12B-64
PROJECT 32 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	0	76
2	Average feet of trench/ space (LF)	0	59
3	Percentage of single commodity trench	0.0%	100.0%
4	Number of connections to the new system	0	1
5	Gas Leaks	N/A	3
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$385/ft	

- Unique Project Detail: Due to the park's layout, extensive mainline was installed with few services being supplied. A significant number of coaches could not accommodate meter installations in the preferred locations. As a result, alternative meter placements requiring additional trenching needed to connect the meters to the necessary utilities.

TABLE 12B-65
PROJECT 32 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$3,002,734.00
Project Completion Cost	$1,719,829.52

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$22,629.34	$(8,750)
Program Management	Not in Estimate	Not in Estimate	$1,656.09	N/A
Overhead	Not in Estimate	Not in Estimate	$632.39	N/A
Engineering Design	Not in Estimate	Not in Estimate	$31.52	N/A
Inspection	Not in Estimate	Not in Estimate	$1,494.54	N/A
AFUDC	Not in Estimate	Not in Estimate	$172.07	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$263.17	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

33. Project Name: Project 33

- Project Scope: This project converted the MHP master meter system and installed 86 mobile home resident gas meters, 0 mobile home resident electric meters, and 2 additional gas meters and 0 additional electric meters to support common area (s). Total meters installed: 88 gas meters and 0 electric meters.

TABLE 12B-66
PROJECT 33 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	0	88
2	Average feet of trench/ space (LF)	0	54
3	Percentage of single commodity trench	0.0%	100.0%
4	Number of connections to the new system	0	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$360/ft	

- Unique Project Detail: This park is gas only park, and extensive gas mainline was installed due to layout of park.

TABLE 12B-67
PROJECT 33 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$3,472,326.00
Project Completion Cost	$1,714,126.60

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$19,478.71	$(11,900)
Program Management	Not in Estimate	Not in Estimate	$1,551.37	N/A
Overhead	Not in Estimate	Not in Estimate	$431.88	N/A
Engineering Design	Not in Estimate	Not in Estimate	$31.25	N/A
Inspection	Not in Estimate	Not in Estimate	$1,200.09	N/A
AFUDC	Not in Estimate	Not in Estimate	$237.61	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$174.63	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

34. Project Name: Project 34

- Project Scope: This project converted the MHP master meter system and installed 82 mobile home resident gas meters, 0 mobile home resident electric meters, and 2 additional gas meters and 0 additional electric meters to support common area (s). 84 gas meters and 0 electric meters were installed in total.

TABLE 12B-68
PROJECT 34 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	0	84
2	Average feet of trench/ space (LF)	0	55
3	Percentage of single commodity trench	0.0%	100.0%
4	Number of connections to the new system	0	1
5	Gas Leaks	N/A	4
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$470/ft	

- Unique Project Detail: The project required work beyond the normal scope due to the existing conditions of the tie-location and associated requirements. To accommodate this, a new two-inch plastic main was offset and installed to serve the mobile home park, while the existing steel main was abandoned in place.

TABLE 12B-69
PROJECT 34 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$3,718,258.00
Project Completion Cost	$2,174,722.94

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$25,889.56	$(5,490)
Program Management	Not in Estimate	Not in Estimate	$828.89	N/A
Overhead	Not in Estimate	Not in Estimate	$1,177.39	N/A
Engineering Design	Not in Estimate	Not in Estimate	$77.51	N/A
Inspection	Not in Estimate	Not in Estimate	$1,883.00	N/A
AFUDC	Not in Estimate	Not in Estimate	$671.81	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$653.44	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

35. Project Name: Project 35

- Project Scope: This project converted the MHP master meter system and installed 61 mobile home resident gas meters, 0 mobile home resident electric meters, and 1 additional gas meters and 0 additional electric meters to support common area (s). Total meters installed: 62 gas meters and 0 electric meters.

TABLE 12B-70
PROJECT 35 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	0	62
2	Average feet of trench/ space (LF)	0	112
3	Percentage of single commodity trench	0.0%	100.0%
4	Number of connections to the new system	0	1
5	Gas Leaks	N/A	
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$207/ft	

- Unique Project Detail: A significant number of coaches could not accommodate meter installations in the preferred locations. As a result, alternative meter placements were required, which led to increased costs due to the additional trenching needed to connect the meters to the necessary utilities.

TABLE 12B-71
PROJECT 35 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$2,549,348.00
Project Completion Cost	$1,432,999.97

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$23,112.90	$(8,266)
Program Management	Not in Estimate	Not in Estimate	$1,436.80	N/A
Overhead	Not in Estimate	Not in Estimate	$1,160.35	N/A
Engineering Design	Not in Estimate	Not in Estimate	$39.66	N/A
Inspection	Not in Estimate	Not in Estimate	$1,449.35	N/A
AFUDC	Not in Estimate	Not in Estimate	$117.03	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$514.47	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

36. Project Name: Project 36

- Project Scope: This project converted the MHP master meter system and installed 155 mobile home resident gas meters, 0 mobile home resident electric meters, and 1 additional gas meters and 0 additional electric meters to support common area (s). 156 gas meters and 0 electric meters were installed in total.

TABLE 12B-72
PROJECT 36 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	0	156
2	Average feet of trench/ space (LF)	0	56
3	Percentage of single commodity trench	0.0%	100.0%
4	Number of connections to the new system	0	1
5	Gas Leaks	N/A	
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$407/ft	

- Unique Project Detail: This park is gas only park and extensive gas mainline was installed due to layout of park.

TABLE 12B-73
PROJECT 36 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$6,268,728.00
Project Completion Cost	$3,522,067.28

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$22,577.35	$(8,802)
Program Management	Not in Estimate	Not in Estimate	$1,224.97	N/A
Overhead	Not in Estimate	Not in Estimate	$890.96	N/A
Engineering Design	Not in Estimate	Not in Estimate	$18.30	N/A
Inspection	Not in Estimate	Not in Estimate	$1,055.28	N/A
AFUDC	Not in Estimate	Not in Estimate	$312.75	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$824.47	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

37. Project Name: Project 37

- Project Scope: This project converted the MHP master meter system and installed 90 mobile home resident gas meters, 90 mobile home resident electric meters, and 2 additional gas meters and 2 additional electric meters to support common area (s). 92 gas meters and 92 electric meters were installed in total.

TABLE 12B-74
PROJECT 37 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	92	92
2	Average feet of trench/ space (LF)	58	58
3	Percentage of single commodity trench	6.1%	5.5%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	1
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$655/ft	

- Unique Project Detail: This park operates as a dual commodity system for gas and electric. Due to its layout, extensive gas and electric mainline installations were required, with only a limited number of services being supplied directly from the mainline.

TABLE 12B-75
PROJECT 37 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$5,442,998.00
Project Completion Cost	$3,710,452.10

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$40,331.00	$8,952
Program Management	Not in Estimate	Not in Estimate	$1,384.22	N/A
Overhead	Not in Estimate	Not in Estimate	$1,641.86	N/A
Engineering Design	Not in Estimate	Not in Estimate	$60.37	N/A
Inspection	Not in Estimate	Not in Estimate	$3,209.62	N/A
AFUDC	Not in Estimate	Not in Estimate	$608.94	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$894.14	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

38. Project Name: Project 38

- Project Scope: This project converted the MHP master meter system and installed 70 mobile home resident gas meters, 70 mobile home resident electric meters, and 3 additional gas meters and 1 additional electric meters to support common area (s). 73 gas meters and 71 electric meters were installed in total.

TABLE 12B-76
PROJECT 38 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	71	73
2	Average feet of trench/ space (LF)	63	64
3	Percentage of single commodity trench	7.3%	8.7%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	22
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$646/ft	

- Unique Project Detail: The location of the common area required additional extensive trenching totalling approximately 300 feet. Due to the park layout, about 482 feet of trench was underutilized for various reasons such as one side of mainline or trench was used to bridge the gap between the homes and transformers. During construction, a city water main was discovered in conflict with a planned transformer location. To resolve this, the switch was made from pad-mounted to an underground transformer, which incurred additional costs.

TABLE 12B-77
PROJECT 38 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$4,364,295.00
Project Completion Cost	$3,237,314.26

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$44,346.77	$12,968
Program Management	Not in Estimate	Not in Estimate	$1,802.55	N/A
Overhead	Not in Estimate	Not in Estimate	$2,625.53	N/A
Engineering Design	Not in Estimate	Not in Estimate	$47.59	N/A
Inspection	Not in Estimate	Not in Estimate	$4,265.78	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,137.92	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$(63.88)	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

39. Project Name: Project 39

- Project Scope: This project converted the MHP master meter system and installed 39 mobile home resident gas meters, 39 mobile home resident electric meters, and 0 additional gas meters and 1 additional electric meters to support common area (s). Total meters installed: 39 gas meters and 40 electric meters.

TABLE 12B-78
PROJECT 39 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	40	39
2	Average feet of trench/ space (LF)	63	61
3	Percentage of single commodity trench	19.5%	15.0%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$153/ft	

- Unique Project Detail: Due to the vacant lots on-site, six bollards and meter stakes were installed to protect gas risers and electric pedestals.

TABLE 12B-79
PROJECT 39 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$1,958,410.00
Project Completion Cost	$453,178.91

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$11,329.47	$(20,050)
Program Management	Not in Estimate	Not in Estimate	$8,175.53	N/A
Overhead	Not in Estimate	Not in Estimate	$837.75	N/A
Engineering Design	Not in Estimate	Not in Estimate	$6.17	N/A
Inspection	Not in Estimate	Not in Estimate	$0.00	N/A
AFUDC	Not in Estimate	Not in Estimate	$607.95	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$1,642.23	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

40. Project Name: Project 40

- Project Scope: This project converted the MHP master meter system and installed 54 mobile home resident gas meters, 54 mobile home resident electric meters, and 3 additional gas meters and 7 additional electric meters to support common area (s). 57 gas meters and 61 electric meters were installed in total.

TABLE 12B-80
PROJECT 40 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	61	57
2	Average feet of trench/ space (LF)	85	87
3	Percentage of single commodity trench	7.8%	3.8%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$557/ft	

- Unique Project Detail: Due to the vacant lots on-site, six bollards and meter stakes were installed to protect gas risers and electric pedestals. Additional, electric tie-in required additional scope due to geographic park location and layout.

TABLE 12B-81
PROJECT 40 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	NA
Project Completion Cost	$3,005,776.14

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$49,275.02	$17,896
Program Management	Not in Estimate	Not in Estimate	$35,473.94	N/A
Overhead	Not in Estimate	Not in Estimate	$4,418.13	N/A
Engineering Design	Not in Estimate	Not in Estimate	$28.89	N/A
Inspection	Not in Estimate	Not in Estimate	$0.00	N/A
AFUDC	Not in Estimate	Not in Estimate	$2,122.63	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$7,231.42	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

41. Project Name: Project 41

- Project Scope: This project converted the MHP master meter system and installed 92 mobile home resident gas meters, 92 mobile home resident electric meters, and 2 additional gas meters and 4 additional electric meters to support common area (s). Total meters installed: 94 gas meters and 96 electric meters.

TABLE 12B-82
PROJECT 41 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	96	94
2	Average feet of trench/ space (LF)	89	86
3	Percentage of single commodity trench	9.8%	4.5%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$278/ft	

- Unique Project Detail: This project incurred additional costs due to encountering rock-adder across signicant portions of the open mainline trench.

TABLE 12B-83
PROJECT 41 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	NA
Project Completion Cost	$2,482,030.97

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$25,854.49	$(5,525)
Program Management	Not in Estimate	Not in Estimate	$14,931.27	N/A
Overhead	Not in Estimate	Not in Estimate	$1,151.96	N/A
Engineering Design	Not in Estimate	Not in Estimate	$8.73	N/A
Inspection	Not in Estimate	Not in Estimate	$0.00	N/A
AFUDC	Not in Estimate	Not in Estimate	$3,513.29	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$6,249.25	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

42. Project Name: Project 42

- Project Scope: This project converted the MHP master meter system and installed 90 mobile home resident gas meters, 90 mobile home resident electric meters, and 3 additional gas meters and 3 additional electric meters to support common area (s). Total meters installed: 93 gas meters and 93 electric meters.

TABLE 12B-84
PROJECT 42 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	93	93
2	Average feet of trench/ space (LF)	58	56
3	Percentage of single commodity trench	14.3%	10.8%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	6
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$704/ft	

- Unique Project Detail: The park layout and size required extensive electric-only trenching and multiple pad-mounted transformers. Additionally, a small section of the park includes gas-only trenching between the homes. This project incurred higher costs as a result.

TABLE 12B-85
PROJECT 42 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$6,113,273.00
Project Completion Cost	$4,284,950.43

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$46,074.74	$14,696
Program Management	Not in Estimate	Not in Estimate	$1,236.24	N/A
Overhead	Not in Estimate	Not in Estimate	$3,122.94	N/A
Engineering Design	Not in Estimate	Not in Estimate	$76.19	N/A
Inspection	Not in Estimate	Not in Estimate	$2,224.69	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,688.14	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$1,429.47	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

43. Project Name: Project 43

- Project Scope: This project converted the MHP master meter system and installed 297 mobile home resident gas meters, 297 mobile home resident electric meters, and 2 additional gas meters and 0 additional electric meters to support common area (s). Total meters installed: 299 gas meters and 297 electric meters.

TABLE 12B-86
PROJECT 43 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	297	299
2	Average feet of trench/ space (LF)	53	56
3	Percentage of single commodity trench	11.0%	16.2%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	54
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$595/ft	

- Unique Project Detail: This park operates as a dual commodity system for gas and electric. Due to its layout, extensive gas and electric mainline installations were required, with only a limited number of services being supplied directly from the mainline. Additionally, the gas tie-in location required scope adjustments due to conflicts with existing utilities.

TABLE 12B-87
PROJECT 43 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$18,230,328.00
Project Completion Cost	$11,296,549.09

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$37,781.10	$6,402
Program Management	Not in Estimate	Not in Estimate	$1,249.68	N/A
Overhead	Not in Estimate	Not in Estimate	$1,457.50	N/A
Engineering Design	Not in Estimate	Not in Estimate	$40.95	N/A
Inspection	Not in Estimate	Not in Estimate	$2,876.48	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,508.57	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$683.85	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

44. Project Name: Project 44

- Project Scope: This project converted the MHP master meter system and installed 85 mobile home resident gas meters, 85 mobile home resident electric meters, and 1 additional gas meters and 2 additional electric meters to support common area (s). Total meters installed: 86 gas meters and 87 electric meters.

TABLE 12B-88
PROJECT 44 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	87	86
2	Average feet of trench/ space (LF)	54	56
3	Percentage of single commodity trench	7.1%	9.2%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	7
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$695/ft	

- Unique Project Detail: This park operates as a dual commodity system for gas and electric. Due to its layout, extensive gas and electric mainline installations were required.

TABLE 12B-89
PROJECT 44 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$5,293,000.00
Project Completion Cost	$3,597,796.10

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$41,353.98	$9,975
Program Management	Not in Estimate	Not in Estimate	$2,598.74	N/A
Overhead	Not in Estimate	Not in Estimate	$2,783.51	N/A
Engineering Design	Not in Estimate	Not in Estimate	$59.32	N/A
Inspection	Not in Estimate	Not in Estimate	$3,049.73	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,447.05	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$1,190.64	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

45. Project Name: Project 45

- Project Scope: This project converted the MHP master meter system and installed 181 mobile home resident gas meters, 181 mobile home resident electric meters, and 3 additional gas meters and 0 additional electric meters to support common area (s). Total meters installed: 184 gas meters and 184 electric meters.

TABLE 12B-90
PROJECT 45 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	184	184
2	Average feet of trench/ space (LF)	72	68
3	Percentage of single commodity trench	10.3%	4.8%
4	Number of connections to the new system	1	2
5	Gas Leaks	N/A	5
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$548/ft	

- Unique Project Detail: The park's numerous dead ends and curved streets prevented the implementation of a standard, efficient grid layout for infrastructure. As a result, additional costs were incurred to accommodate the unique site conditions.

TABLE 12B-91
PROJECT 45 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$11,943,071.00
Project Completion Cost	$7,593,002.68

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$41,266.32	$9,887
Program Management	Not in Estimate	Not in Estimate	$1,233.43	N/A
Overhead	Not in Estimate	Not in Estimate	$1,228.76	N/A
Engineering Design	Not in Estimate	Not in Estimate	$30.58	N/A
Inspection	Not in Estimate	Not in Estimate	$3,153.42	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,521.90	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$619.35	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

46. Project Name: Project 46

- Project Scope: This project converted the MHP master meter system and installed 116 mobile home resident gas meters, 116 mobile home resident electric meters, and 1 additional gas meters and 1 additional electric meters to support common area (s). Total meters installed: 117 gas meters and 117 electric meters.

TABLE 12B-92
PROJECT 46 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	117	117
2	Average feet of trench/ space (LF)	63	61
3	Percentage of single commodity trench	10.3%	7.2%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	12
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$630/ft	

- Unique Project Detail: This park operates as a dual commodity system for gas and electric. Due to its layout, extensive gas and electric mainline installations were required, with only a limited number of services being supplied directly from the mainline.

TABLE 12B-93
PROJECT 46 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$6,925,111.00
Project Completion Cost	$5,018,131.40

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$42,890.01	$11,511
Program Management	Not in Estimate	Not in Estimate	$1,337.87	N/A
Overhead	Not in Estimate	Not in Estimate	$2,298.02	N/A
Engineering Design	Not in Estimate	Not in Estimate	$94.72	N/A
Inspection	Not in Estimate	Not in Estimate	$3,643.41	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,109.72	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$1,103.14	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

47. Project Name: Project 47

- Project Scope: This project converted the MHP master meter system and installed 192 mobile home resident gas meters, 192 mobile home resident electric meters, and 2 additional gas meters and 2 additional electric meters to support common area (s). Total meters installed: 194 gas meters and 194 electric meters.

TABLE 12B-94
PROJECT 47 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	194	194
2	Average feet of trench/ space (LF)	65	68
3	Percentage of single commodity trench	4.0%	8.0%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	63
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$579/ft	

- Unique Project Detail: This project featured a unique layout, requiring extensive mainline installations to serve a relatively small number of homes. Additionally, several coaches were unable to accommodate meter installations in the preferred locations. As a result, alternative meter placements were necessary, leading to increased costs due to additional trenching required for proper utility connections.

TABLE 12B-95
PROJECT 47 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$11,566,747.00
Project Completion Cost	$7,972,127.02

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$41,093.44	$9,714
Program Management	Not in Estimate	Not in Estimate	$1,315.63	N/A
Overhead	Not in Estimate	Not in Estimate	$1,828.42	N/A
Engineering Design	Not in Estimate	Not in Estimate	$86.76	N/A
Inspection	Not in Estimate	Not in Estimate	$2,252.67	N/A
AFUDC	Not in Estimate	Not in Estimate	$2,508.81	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$863.24	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

48. Project Name: Project 48

- Project Scope: This project converted the MHP master meter system and installed 6 mobile home resident gas meters, 23 mobile home resident electric meters, and 0 additional gas meters and 2 additional electric meters to support common area (s). 6 gas meters and 25 electric meters were installed in total.

TABLE 12B-96
PROJECT 48 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	25	6
2	Average feet of trench/ space (LF)	42	44
3	Percentage of single commodity trench	5.7%	2.0%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	1
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$994/ft	

- Unique Project Detail: During construction, hard rock was discovered and the construction crew required additional resources to install assets.

TABLE 12B-97
PROJECT 48 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$1,185,385.00
Project Completion Cost	$1,059,918.37

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$42,396.73	$11,018
Program Management	Not in Estimate	Not in Estimate	$933.75	N/A
Overhead	Not in Estimate	Not in Estimate	$8,135.17	N/A
Engineering Design	Not in Estimate	Not in Estimate	$496.35	N/A
Inspection	Not in Estimate	Not in Estimate	$4,826.36	N/A
AFUDC	Not in Estimate	Not in Estimate	$935.05	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$3,805.27	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

49. Project Name: Project 49

- Project Scope: This project converted the MHP master meter system and installed 87 mobile home resident gas meters, 0 mobile home resident electric meters, and 2 additional gas meters and 0 additional electric meters to support common area (s). Total meters installed: 89 gas meters and 0 electric meters.

TABLE 12B-98
PROJECT 49 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	0	89
2	Average feet of trench/ space (LF)	0	51
3	Percentage of single commodity trench	0.0%	100.0%
4	Number of connections to the new system	0	1
5	Gas Leaks	N/A	2
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$382/ft	

- Unique Project Detail: During construction, the crew encountered compacted claypan, making excavation difficult for mainline installation. Additionally, the city required extensive restoration per its guidelines, which exceeded standard practices for bellholes and tie-ins within the right of way

TABLE 12B-99
PROJECT 49 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$2,316,314.00
Project Completion Cost	$1,748,314.73

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$19,643.99	$(11,735)
Program Management	Not in Estimate	Not in Estimate	$742.17	N/A
Overhead	Not in Estimate	Not in Estimate	$2,112.96	N/A
Engineering Design	Not in Estimate	Not in Estimate	$86.27	N/A
Inspection	Not in Estimate	Not in Estimate	$1,586.83	N/A
AFUDC	Not in Estimate	Not in Estimate	$397.54	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$799.95	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

50. Project Name: Project 50

- Project Scope: This project converted the MHP master meter system and installed 35 mobile home resident gas meters, 35 mobile home resident electric meters, and 1 additional gas meters and 2 additional electric meters to support common area (s). Total meters installed: 36 gas meters and 37 electric meters.

TABLE 12B-100
PROJECT 50 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	37	36
2	Average feet of trench/ space (LF)	65	67
3	Percentage of single commodity trench	0.0%	0.0%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	2
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$700/ft	

- Unique Project Detail: This project incurred higher costs due to the park's layout, which required extensive gas-only trenching. Majority of the park had vacant spaces which required additional bollards for protections. Additionally, trench depth had to be increased to resolve conflicts with existing utilities within the park.

TABLE 12B-101
PROJECT 50 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$3,145,308.00
Project Completion Cost	$1,691,768.45

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$45,723.47	$14,344
Program Management	Not in Estimate	Not in Estimate	$1,485.43	N/A
Overhead	Not in Estimate	Not in Estimate	$3,291.38	N/A
Engineering Design	Not in Estimate	Not in Estimate	$198.55	N/A
Inspection	Not in Estimate	Not in Estimate	$3,061.16	N/A
AFUDC	Not in Estimate	Not in Estimate	$2,901.11	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$1,566.08	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

51. Project Name: Project 51

- Project Scope: This project converted the MHP master meter system and installed 34 mobile home resident gas meters, 34 mobile home resident electric meters, and 2 additional gas meters and 2 additional electric meters to support common area (s). 36 gas meters and 36 electric meters were installed in total.

TABLE 12B-102
PROJECT 51 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	36	36
2	Average feet of trench/ space (LF)	45	52
3	Percentage of single commodity trench	6.0%	18.0%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$829/ft	

- Unique Project Detail: This project had a unique layout that required large portions of the mainline to serve a small quantity of the mobile homes.

TABLE 12B-103
PROJECT 51 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$2,411,050.00
Project Completion Cost	$1,652,588.61

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$45,905.24	$14,526
Program Management	Not in Estimate	Not in Estimate	$1,648.64	N/A
Overhead	Not in Estimate	Not in Estimate	$3,249.18	N/A
Engineering Design	Not in Estimate	Not in Estimate	$211.04	N/A
Inspection	Not in Estimate	Not in Estimate	$3,736.59	N/A
AFUDC	Not in Estimate	Not in Estimate	$664.89	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$1,506.10	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

52. Project Name: Project 52

- Project Scope: This project converted the MHP master meter system and installed 109 mobile home resident gas meters, 109 mobile home resident electric meters, and 1 additional gas meters and 0 additional electric meters to support common area (s). Total meters installed: 110 gas meters and 109 electric meters.

TABLE 12B-104
PROJECT 52 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	109	110
2	Average feet of trench/ space (LF)	56	54
3	Percentage of single commodity trench	6.8%	3.4%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	9
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$683/ft	

- Unique Project Detail: This project experienced increased costs because the park layout required extensive gas-only trenches in certain areas and electric-only trenches in others.

TABLE 12B-105
PROJECT 52 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$6,748,288.00
Project Completion Cost	$4,336,893.10

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$39,426.30	$8,047
Program Management	Not in Estimate	Not in Estimate	$1,442.76	N/A
Overhead	Not in Estimate	Not in Estimate	$1,577.87	N/A
Engineering Design	Not in Estimate	Not in Estimate	$67.61	N/A
Inspection	Not in Estimate	Not in Estimate	$2,615.57	N/A
AFUDC	Not in Estimate	Not in Estimate	$945.56	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$689.15	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

53. Project Name: Project 53

- Project Scope: This project converted the MHP master meter system and installed 69 mobile home resident gas meters, 69 mobile home resident electric meters, and 2 additional gas meters and 2 additional electric meters to support common area (s). 71 gas meters and 71 electric meters were installed in total.

TABLE 12B-106
PROJECT 53 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	71	71
2	Average feet of trench/ space (LF)	53	51
3	Percentage of single commodity trench	9.9%	6.3%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	8
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$730/ft	

- Unique Project Detail: This project featured a unique layout, requiring mainline installations to serve a relatively small number of homes. Additionally, several coaches were unable to accommodate meter installations in the preferred locations. As a result, alternative meter

placements were necessary, leading to increased costs due to additional trenching required for proper utility connections.

TABLE 12B-107
PROJECT 53 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$4,997,996.00
Project Completion Cost	$2,910,038.41

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$40,986.46	$9,607
Program Management	Not in Estimate	Not in Estimate	$1,634.48	N/A
Overhead	Not in Estimate	Not in Estimate	$1,795.66	N/A
Engineering Design	Not in Estimate	Not in Estimate	$166.55	N/A
Inspection	Not in Estimate	Not in Estimate	$3,335.43	N/A
AFUDC	Not in Estimate	Not in Estimate	$623.06	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$738.31	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

54. Project Name: Project 54

- Project Scope: This project converted the MHP master meter system and installed 45 mobile home resident gas meters, 45 mobile home resident electric meters, and 0 additional gas meters and 0 additional electric meters to support common area (s). Total meters installed: 45 gas meters and 45 electric meters.

TABLE 12B-108
PROJECT 54 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	45	45
2	Average feet of trench/ space (LF)	61	61
3	Percentage of single commodity trench	5.6%	6.4%
4	Number of connections to the new system	1	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$759/ft	

- Unique Project Detail: During construction, hard rock was encountered, requiring the crew to allocate additional resources and widen the trench for mainline installation. As a result, further restoration was necessary to properly cover the expanded trench.

TABLE 12B-109
PROJECT 54 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$3,129,031.00
Project Completion Cost	$2,222,417.09

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$49,387.05	$18,008
Program Management	Not in Estimate	Not in Estimate	$5,699.17	N/A
Overhead	Not in Estimate	Not in Estimate	$3,790.48	N/A
Engineering Design	Not in Estimate	Not in Estimate	$281.38	N/A
Inspection	Not in Estimate	Not in Estimate	$3,295.66	N/A
AFUDC	Not in Estimate	Not in Estimate	$1,163.83	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$3,214.52	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

55. Project Name: Project 55

- Project Scope: This project converted the MHP master meter system and installed 39 mobile home resident gas meters, 0 mobile home resident electric meters, and 1 additional gas meters and 0 additional electric meters to support common area (s). 40 gas meters and 0 electric meters were installed in total.

TABLE 12B-110
PROJECT 55 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	0	40
2	Average feet of trench/ space (LF)	0	46
3	Percentage of single commodity trench	0.0%	100.0%
4	Number of connections to the new system	0	1
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$413/ft	

- Unique Project Detail: This park is gas only park and extensive gas mainline was installed due to layout of park. Additionally, the park had several vacant lots which required additional bollards.

TABLE 12B-111
PROJECT 55 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$1,369,090.00
Project Completion Cost	$761,485.14

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$19,037.13	$(12,342)
Program Management	Not in Estimate	Not in Estimate	$582.58	N/A
Overhead	Not in Estimate	Not in Estimate	$2,822.21	N/A
Engineering Design	Not in Estimate	Not in Estimate	$158.49	N/A
Inspection	Not in Estimate	Not in Estimate	$823.25	N/A
AFUDC	Not in Estimate	Not in Estimate	$178.33	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$1,397.29	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

56. Project Name: Project 56

- Project Scope: This project converted the MHP master meter system and installed 0 mobile home resident gas meters, 58 mobile home resident electric meters, and 0 additional gas meters and 0 additional electric meters to support common area (s). Total meters installed: 0 gas meters and 58 electric meters.

TABLE 12B-112
PROJECT 56 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	58	0
2	Average feet of trench/ space (LF)	42	42
3	Percentage of single commodity trench	0.0%	0.0%
4	Number of connections to the new system	1	0
5	Gas Leaks	N/A	6
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$550/ft	

- Unique Project Detail: This park is electric only and extensive electric mainline was installed due to layout of park.

TABLE 12B-113
PROJECT 56 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$2,271,051.00
Project Completion Cost	$1,335,043.75

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$23,018.00	$(8,361)
Program Management	Not in Estimate	Not in Estimate	$887.20	N/A
Overhead	Not in Estimate	Not in Estimate	$1,782.80	N/A
Engineering Design	Not in Estimate	Not in Estimate	$94.25	N/A
Inspection	Not in Estimate	Not in Estimate	$1,575.53	N/A
AFUDC	Not in Estimate	Not in Estimate	$528.63	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$979.54	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

57. Project Name: Project 57

- Project Scope: This project converted the MHP master meter system and installed 43 mobile home resident gas meters, 0 mobile home resident electric meters, and 2 additional gas meters and 0 additional electric meters to support common area (s). Total meters installed: 45 gas meters and 0 electric meters.

TABLE 12B-114
PROJECT 57 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	0	45
2	Average feet of trench/ space (LF)	0	52
3	Percentage of single commodity trench	0.0%	100.0%
4	Number of connections to the new system	0	1
5	Gas Leaks	N/A	1
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$407/ft	

- Unique Project Detail: This park is gas only park and extensive gas mainline was installed due to layout of park.

TABLE 12B-115
PROJECT 57 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	$1,758,222.00
Project Completion Cost	$944,415.42

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$20,987.01	$(10,392)
Program Management	Not in Estimate	Not in Estimate	$1,022.44	N/A
Overhead	Not in Estimate	Not in Estimate	$2,267.53	N/A
Engineering Design	Not in Estimate	Not in Estimate	$256.65	N/A
Inspection	Not in Estimate	Not in Estimate	$1,630.64	N/A
AFUDC	Not in Estimate	Not in Estimate	$944.69	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$986.89	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).

58. Project Name: Project 58

- Project Scope: This project converted the MHP master meter system and installed 13 mobile home resident gas meters, 13 mobile home resident electric meters, and 0 additional gas meters and 0 additional electric meters to support common area (s). Total meters installed: 13 gas meters and 13 electric meters.

TABLE 12B-116
PROJECT 58 – HIGH-LEVEL STATISTICS

Line No.	High level Statistics	Electric	Gas
1	Number of Services	13	13
2	Average feet of trench/ space (LF)	31	31
3	Percentage of single commodity trench	0.0%	0.0%
4	Number of connections to the new system	0	0
5	Gas Leaks	N/A	0
6	California Department of HCD Inspection Delays	0 days	
7	Cost per foot	$745/ft	

- Unique Project Detail: PG&E originally converted this park as part of the MHP pilot program. Years later, as part of a settlement, PG&E returned at the owner's request to modify several spaces. The work involved extending 13 services to accommodate the requested changes.

TABLE 12B-117
PROJECT 58 – PROJECT COST
(THOUSANDS OF DOLLARS)

	Total
Project Estimate	NA
Project Completion Cost	$298,793.04

	Common Case Estimate/Space (Filed in 2012)	Common Case Estimate/Space with Escalation[(a)]	Actual Cost/ Space	Variance
TTM and BTM Construction	$23,0001	$31,379.10	$22,984.08	($8,395)
Program Management	Not in Estimate	Not in Estimate	$(294.18)	N/A
Overhead	Not in Estimate	Not in Estimate	$198.76	N/A
Engineering Design	Not in Estimate	Not in Estimate	$0.00	N/A
Inspection	Not in Estimate	Not in Estimate	$3,997.02	N/A
AFUDC	Not in Estimate	Not in Estimate	$0.00	N/A
Supporting organizations	Not in Estimate	Not in Estimate	$445.55	N/A

(a) Escalation at Consumer Price Index per year for 12 years (2013-2024).