



Pacific Gas and Electric Company 2027 GRC

A.25-05-009

TURN HEARING EXHIBIT

TURN Ex-113

Andrew Abranches, PG&E

PG&E Response to TURN DR 160

**PACIFIC GAS AND ELECTRIC COMPANY
2027 General Rate Case Phase I
Application 25-05-009
Data Response**

PG&E Data Request No.:	TURN_160-Q001
PG&E File Name:	GRC-2027-Phi_DR_TURN_160-Q001
Request Date:	April 20, 2026
Requester DR No.:	160
Requesting Party:	The Utility Reform Network
Requester:	Robert Finkelstein
Date Sent:	April 27, 2026
PG&E Witness(es):	Andrew P. Abranches – Electric Operations

SUBJECT: WMPMA AND FRMMA CLOSURE

QUESTION 001

At pages 4-11 to 4-12 of PG&E-16, Vol. 1, the testimony states,

“It is with this alignment in mind that the Legislature granted the Commission discretion to determine whether a memorandum account is needed. In other words, the alignment between WMP and GRC submission schedules contemplated by SB 254 is a necessary precondition before the Commission should exercise any discretion regarding closure of the WMPMA and FRMMA.”

- a. Please provide all written materials PG&E provided to California state legislators or legislative staff (including but not limited to formal position letters and e-mail communications) regarding the alignment of the WMP and GRC submission schedules during the legislative process that led to enactment of SB 254.
- b. Please provide all written materials PG&E provided to California state legislators or legislative staff (including but not limited to formal position letters and e-mail communications) regarding the Commission discretion whether a memorandum account is needed during the legislative process that led to enactment of SB 254.
- c. Please provide all written materials PG&E provided to California state legislators or legislative staff (including but not limited to formal position letters and e-mail communications) regarding the alignment of the WMP and GRC submission schedules during the legislative process regarding consideration of Senate Bill (SB) 1003 in 2024.
- d. Please provide all written materials PG&E provided to California state legislators or legislative staff (including but not limited to formal position letters and e-mail communications) regarding the Commission discretion whether a memorandum account is needed during the legislative process regarding consideration of Senate Bill (SB) 1003 in 2024.

ANSWER 001

a-b. There are no written materials PG&E provided to California state legislator or legislative staff regarding the alignment of the WMP and GRC submission schedules during the legislative process of SB 254.

c-d. Please see attachments "*GRC-2027-Phil_DR_TURN_160-Q001Atch01.pdf*", "*GRC-2027-Phil_DR_TURN_160-Q001Atch02.pdf*", "*GRC-2027-Phil_DR_TURN_160-Q001Atch03.pdf*" and "*GRC-2027-Phil_DR_TURN_160-Q001Atch04.pdf*".



RE: SB 1003 amendments - concerns

From Folchi, Gino <Gino.Folchi@asm.ca.gov>

Date Thu 8/29/2024 2:07 PM

To Ebeck, Brandon <BNE7@pge.com>

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Really appreciate the quick feedback. Will reach out if needed. Thanks.

Gino Folchi

Ph: 916-319-3900

Assembly Republican Caucus

Environmental Safety & Toxic Materials Committee

Utilities & Energy Committee

From: Ebeck, Brandon

Sent: Thursday, August 29, 2024 7:51 AM

To: Folchi, Gino

Subject: SB 1003 amendments - concerns

Gino,

The following reflects our initial quick feedback on SB 1003 as amended yesterday.

At a high level, we have two primary issues that we'd like to request action on:

- **Interim Year Cost Recovery:** While we are inclined to support the future alignment of the WMP/GRC cycles and recognize the benefits there, we are very concerned about the language that takes away the requirement that we have a memo account, and the certainty provided to the investor community that was provided in prior bills (SB 901) that required this account as part of the enhanced WMP process. We'd request some clarity that the CPUC is not allowed to take away an existing memorandum account until we file a GRC under the new procedures. For PG&E, we file next summer before the new GRC/WMP processes kick in post Jan 1 2027. There's no obligation for the PUC to authorize an account that would address the potentially massive gaps between WMP required costs and GRC funding (unlike now, where it's required, along with the right to file for reasonable cost recovery). Yes, the commission can allow the memo account to continue and may allow for a new one, but it's not required and we fully expect intervenors to argue to abandon it once the legislature sends that signal. That is why the memorandum account was required in previous legislation. We are aware that SCE also has this concern and sounds like SDG&E does as well. We are currently seeking a letter to the journal to clarify that this change will only apply to prospective GRC/WMPs once filed under the "new" process.
- **SED Enforcement Expansion:** the bill now allows, but does not require enforcement for noncompliance with a WMP. However, by removing the "non-substantial" requirement, the door is open for a wide variety of new fines/penalties for minor issues. Additionally the language has been

modified from "Violations" to "Non-conformances". The mechanism to contest the penalties or remedy is ambiguous vs the current ability to contest while they are being deliberated at OEIS. One big area is in our veg management program. Weather is getting work so our ability to identify trees in any given cycle is getting harder.

- Additionally, we have some concerns with the CEQA language as drafted. I spoke to Les already who confirmed the intent is to clarify that any UG plan is not a Project. The ambiguous language could be resolved by simply deleting everything after the first comma in that section. The remaining part of that paragraph is ambiguous and circular and opens us to the same challenges we've been facing on this very issue.
- 9 months is a significant amount of time for OEIS to issue a decision

There are likely other areas we could suggest additional cost/efficiency streamlining processes in a future discussion i.e. OEIS VM requirements that aren't cost-effective. We are also still deciphering this new paradigm shift back to the PUC, reversing many of the changes made just 5 years ago when OEIS was created (to clearly focus on safety first), and want to be clear that we should not overcorrect to cost ahead of safety. As of right now, we don't have a formal position on the bill. Sounds like this gets heard tomorrow.

Thanks,
Brandon

You can read about PG&E's data privacy practices at [PGE.com/privacy](https://www.pge.com/privacy).

4/24/26, 3:10 PM

RE: Serious concerns on SB 1003 amendments; consideration of clarifying LTJ..... - Toback, Scott - Outlook



RE: Serious concerns on SB 1003 amendments; consideration of clarifying LTJ.....

From Grant Mack <Grant.Mack@gov.ca.gov>

Date Fri 8/30/2024 4:53 PM

To Ebeck, Brandon <BNE7@pge.com>

Cc Patterson, Chris <CMPR@pge.com>

1 attachment (28 KB)

SB 1003 Letter to the Journal 8.30.24.docx;

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Attached is what is being shared with Senator Dodds office and what the GO is comfortable with.
Best,

Grant A. Mack

Deputy Legislative Secretary –

Energy/Natural Resources/Climate/Telecommunications

Office of Governor Gavin Newsom

Grant.Mack@gov.ca.gov



**California
Climate Action**

From: Ebeck, Brandon

Sent: Friday, August 30, 2024 4:24 PM

To: Grant Mack

Cc: Patterson, Chris

Subject: Re: Serious concerns on SB 1003 amendments; consideration of clarifying LTJ.....

Grant,

Talked to Les and Christine. Our understanding is that you have the pen editing the letter to the journal. Please share a draft ASAP before transmitting to Senator Dodd's office so we can double check that our concerns are clearly addressed. Ideally, we get the letter before testifying on the bill this evening in Assembly U&E.

Thank you,

Brandon

From: Grant Mack <Grant.Mack@gov.ca.gov>

Sent: Friday, August 30, 2024 7:23 AM

4/24/26, 3:10 PM

RE: Serious concerns on SB 1003 amendments; consideration of clarifying LTJ..... - Toback, Scott - Outlook

To: Kauss, Kent W <KKauss@semprautilities.com>; Patterson, Chris <CMPR@pge.com>; Le-Quyen Nguyen <Le-Quyen.Nguyen@gov.ca.gov>
Cc: Andrew Robert Baldonado <andrew.baldonado@sce.com>; Mitchell, Eugene <EMitchell@socalgas.com>; Ebeck, Brandon <BNE7@pge.com>; CAMPBELL STRATEGY & ADVOCACY LLC <greg@campbellstratadv.com>
Subject: Re: Serious concerns on SB 1003 amendments; consideration of clarifying LTJ.....

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Hi Everyone,
 Are you available at 10:30am today to discuss? I can send out a zoom invite.
 Best,
 Grant A. Mack
 Deputy Legislative Secretary
 Energy/Climate/Natural Resources/Telecommunications
 Office of Governor Newsom
Sent from phone

From: Kauss, Kent W <KKauss@semprautilities.com>
Sent: Friday, August 30, 2024 12:30:46 AM
To: Christine Aurre <Christine.Aurre@gov.ca.gov>; Patterson, Chris <CMPR@pge.com>; Grant Mack <Grant.Mack@gov.ca.gov>; Ann Patterson <Ann.Patterson@GOV.CA.GOV>; Le-Quyen Nguyen <Le-Quyen.Nguyen@gov.ca.gov>; Dana Williamson <dana.williamson@gov.ca.gov>
Cc: Andrew Robert Baldonado <andrew.baldonado@sce.com>; Mitchell, Eugene <EMitchell@socalgas.com>; Ebeck, Brandon <BNE7@pge.com>; CAMPBELL STRATEGY & ADVOCACY LLC <greg@campbellstratadv.com>
Subject: Re: Serious concerns on SB 1003 amendments; consideration of clarifying LTJ.....
 Given the time constraints on this issue, can we discuss it and get some feedback on the issue and the letter?
 Get [Outlook for iOS](#)

From: Christine Aurre <Christine.Aurre@gov.ca.gov>
Sent: Thursday, August 29, 2024 9:39:40 PM
To: Patterson, Chris <CMPR@pge.com>; Grant Mack <Grant.Mack@gov.ca.gov>; Ann Patterson <Ann.Patterson@GOV.CA.GOV>; Le-Quyen Nguyen <Le-Quyen.Nguyen@gov.ca.gov>; Dana Williamson <dana.williamson@gov.ca.gov>
Cc: Andrew Robert Baldonado <andrew.baldonado@sce.com>; Kauss, Kent W <KKauss@semprautilities.com>; Mitchell, Eugene <EMitchell@socalgas.com>; Ebeck, Brandon <BNE7@pge.com>; CAMPBELL STRATEGY & ADVOCACY LLC <greg@campbellstratadv.com>
Subject: [EXTERNAL] Re: Serious concerns on SB 1003 amendments; consideration of clarifying LTJ.....

Acknowledging receipt. Thanks.
 Get [Outlook for iOS \[aka.ms\]](#)

4/24/26, 3:10 PM

RE: Serious concerns on SB 1003 amendments; consideration of clarifying LTJ..... - Toback, Scott - Outlook

From: Patterson, Chris <CMPR@pge.com>**Sent:** Thursday, August 29, 2024 10:19 AM**To:** Christine Aurre <Christine.Aurre@gov.ca.gov>; Grant Mack <Grant.Mack@gov.ca.gov>; Ann Patterson <Ann.Patterson@GOV.CA.GOV>; Le-Quyen Nguyen <Le-Quyen.Nguyen@gov.ca.gov>; Dana Williamson <dana.williamson@gov.ca.gov>**Cc:** Andrew Robert Baldonado <andrew.baldonado@sce.com>; Kauss, Kent W <KKauss@semprautilities.com>; Mitchell, Eugene <EMitchell@socalgas.com>; Ebeck, Brandon <BNE7@pge.com>; Greg Campbell <greg@campbellstratadv.com>**Subject:** Serious concerns on SB 1003 amendments; consideration of clarifying LTJ.....

Hey Dana, Christine, Ann, Grant, Le-Quyen

Following on to the below concerns and the conversations you have with each of us, SCE, SDG&E and PG&E believe a letter to the journal would provide needed clarity around SB 1003's intent and mitigate the serious risks we've raised. Attached/below reflects what we think could do the trick.

We respectfully ask for your consideration. Our teams will also be speaking with the author/Senator Dodd.

Please don't hesitate to let us know if you have questions or need further information.

Chris

SB 1003 Draft Letter to Journal

I write to clarify the intent of Section 19 of Senate Bill 1003, which modifies Public Utilities Code Section 8386.4(a)(2) and states, in part

In the commission's discretion, each electrical corporation may establish a memorandum account to track costs incurred for wildfire risk mitigation that are unforeseen and incremental to the wildfire risk mitigation programs and activities authorized in the electrical corporation's revenue requirements.

For purposes of Senate Bill 1003, the intention is to harmonize the scope of work approved in a wildfire mitigation plan by the Office of Energy Infrastructure Safety with the cost recovery approved by the California Public Utilities Commission in a general rate case application filed after January 1, 2027, as specified in Section 8386.4(b). This Section is not intended to alter the continued authorization and use of existing memorandum accounts for wildfire mitigation work cost recovery prior to Commission approval of general rate case applications filed after January 1, 2027.

For further clarification, Section 23 of Senate Bill 1003, contains several "clean up" clarifications to Section 8389(a) pertaining to the issuance of the safety certificate, which is now referred to as the "certificate." These clarifications are not intended to substantively modify the eligibility requirements for issuance of the certificate or alter in any way the protections afforded to an electrical corporation that holds a certificate.

From: Ebeck, Brandon <BNE7@pge.com>**Sent:** Wednesday, August 28, 2024 7:30 PM**To:** Grant Mack <Grant.Mack@gov.ca.gov>; Spahnn, Leslie <Leslie.Spahnn@sen.ca.gov>**Cc:** Patterson, Chris <CMPR@pge.com>; 'Greg Campbell' <greg@campbellstratadv.com>; dana.williamson@gov.ca.gov; ann.patterson@gov.ca.gov; Christine Aurre <christine.aurre@gov.ca.gov>**Subject:** SB 1003 amendments - concerns

Grant and Les,

The following reflects our initial quick feedback on SB 1003 as amended a few hours ago.

At a high level, we have two primary issues that we'd like to request action on:

- **Interim Year Cost Recovery:** While we are inclined to support the future alignment of the WMP/GRC cycles and recognize the benefits there, we are very concerned about the language that takes away the requirement that we have a memo account, and the

4/24/26, 3:10 PM

RE: Serious concerns on SB 1003 amendments; consideration of clarifying LTJ..... - Toback, Scott - Outlook

certainty provided to the investor community that was provided in prior bills that required this account. We'd request some clarity that the CPUC is not allowed to take away an existing memorandum account until we file a GRC under the new procedures. For PG&E, we file next summer before the new GRC/WMP processes kick in, there's no obligation for the PUC to authorize an account that would address the potentially massive gaps between WMP required costs and GRC funding (unlike now, where it's required, along with the right to file for reasonable cost recovery). Yes, the commission can allow the memo account to continue and may allow for a new one, but it's not required and we fully expect intervenors to argue to abandon it once the legislature sends that signal. That is why the memorandum account was required in previous legislation. We are aware that SCE also has this concern and sounds like SDG&E does as well.

- **SED Enforcement Expansion:** the bill now allows, but does not require enforcement for noncompliance with a WMP. However, by removing the "non-substantial" requirement, the door is open for a wide variety of new fines/penalties for minor issues. Additionally the language has been modified from "Violations" to "Non-conformances". The mechanism to contest the penalties or remedy is ambiguous vs the current ability to contest while they are being deliberated at OEIS. One big area is in our veg management program. Weather is getting work so our ability to identify trees in any given cycle is getting harder.
- Additionally, we have some concerns with the CEQA language as drafted. I spoke to Les already who confirmed the intent is to clarify that any UG plan is not a Project. The ambiguous language could be resolved by simply deleting everything after the first comma in that section. The remaining part of that paragraph is ambiguous and circular and opens us to the same challenges we've been facing on this very issue.
- 9 months is a significant amount of time for OEIS to issue a decision

We would welcome a collaborative conversation on possible steps to remedy this, but acknowledge there is no realistic time to correct them before tonight's deadline. Maybe we can address this with a letter to the journal and/or a commitment for January clean up language. There are likely other areas we could suggest additional cost/efficiency streamlining processes in a future discussion I.e. OEIS VM requirements that aren't cost-effective.

Thanks,
Brandon

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ASSEMBLY FLOOR ALERT

SB 1003 (Dodd) – **OPPOSE**

As of August 31, 2024

FILE ITEM: 3

SB 1003 UNDERMINES PROGRESS ON WILDFIRE RISK REDUCTION

LATE EFFORT TO REWRITE WILDFIRE MITIGATION FRAMEWORK FLAWED

HOLD BILL UNTIL 2025

Southern California Edison, Pacific Gas and Electric, and San Diego Gas & Electric (collectively, the IOUs), must regrettably OPPOSE SB 1003 (Dodd), which would modify the framework relevant to the submission and approval of wildfire mitigation plans (WMPs) in alignment with utility General Rate Case (GRC) schedules. However, SB 1003 will add significant uncertainty in the transition to WMPs filed in alignment with GRCs, until the transition set to begin in 2027.

This bill is a massive re-write of an important policy governing wildfire mitigation plans for utilities. While we appreciate the intention behind the bill it landed before the legislature so late that we weren't given time to fix some of the identified flaws. Because of the importance of this policy and the risks involved if it is implemented in ways we fear, the IOUs must ask that this bill be held until January when all parties can participate in an open and transparent process to address the shortcomings of this bill.

Vote “NO” on SB 1003

SB 1003

Letter to Journal

Dear Ms. Contreras,

I write to clarify the intent of Section 19 of my bill SB 1003, which, among other changes, modifies Public Utilities Code Section 8386.4(a)(2).

It is my intent to harmonize the scope of work approved in a utility Wildfire Mitigation Plan by the Office of Energy Infrastructure Safety with the cost recovery approved by the California Public Utilities Commission (CPUC) in a General Rate Case (GRC) Application filed after January 1, 2027, as specified in Public Utilities Code Section 8386.4(b). This code section is not intended to alter the continued use of existing Memorandum Accounts for utility wildfire mitigation cost recovery prior to CPUC approval of GRC Applications filed after January 1, 2027.

Sincerely,

Senator Bill Dodd