

PG&E HEARING ROOM CROSS EXHIBIT PG&E Ex-28

A.25-05-009

In Lieu of Cross, Data Responses:

PGE_CalAdvocates 015

PGE_CalAdvocates 015 Supplemental

PGE_CalAdvocates 053

PGE_CalAdvocates 054

PGE_CalAdvocates 055

(Witness: Amrisha Banarsee)



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California Public Utilities Commission*

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**PUBLIC ADVOCATES OFFICE
DATA RESPONSE
Pacific Gas & Electric Company Test Year 2027 General Rate Case
A.25-05-009**

Date: 10 March 2026

Origination Date: 19 February 2026

Response Due: **10 March 2026**

To: Hannah Keller
cc: GRC@pge.com

GRC 2027 Coordinators:
GRCCaseCoordinators@pge.com

From: Dao Phan, Project Coordinator
Public Advocates Office
505 Van Ness Avenue, Room 4104
San Francisco, CA 94102 dao.phan@cpuc.ca.gov

Data Request No: GRC-2023-Phi_DR_PGE_CalAdvocates015

GENERAL OBJECTIONS

Cal Advocates objects to each data request to the extent that it mischaracterizes Cal Advocates' opening testimony.

Cal Advocates objects to each data request to the extent that it is overly broad, unduly burdensome, or not reasonably calculated to lead to the discovery of admissible evidence.

Cal Advocates objects to each instruction and data request as overly broad and unduly burdensome to the extent that it seeks documents or information that PG&E will possess when it receives Cal Advocates' opening testimony. Responding to such requests would be oppressive, unduly burdensome, and unnecessarily expensive, and the burden of responding to such requests is substantially the same or less for PG&E as for Cal Advocates. All such documents and information will not be produced.

Cal Advocates objects to each instruction and data request to the extent that it seeks



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information or documents protected from disclosure by the attorney-client privilege, attorney work product doctrine, or any other applicable privilege.

PG&E Question 1:

Referring to Cal Advocates Testimony, Exhibit CA-20, Labor Escalation, page 31, line 9 through page 34, line 8 (including Table 18-13):

a. Provide all documents (including internal Cal Advocates analyses, third-party information, statistics, benchmarking information) Cal Advocates reviewed in preparing its analysis of PG&E's labor escalation. Include the documents considered by Cal Advocates, regardless of whether it is cited in the testimony.

Public Advocates Office Response to Question 1:

Please see Cal Advocates' workpapers, A2505009 Public Advocates Office People (W. Yang) Compensation Benefits Part 1 of 3 (CA-20-WP), which were provided to PG&E in February 2026.

PG&E Question 2:

Referring to Cal Advocates Testimony, Exhibit CA-20, p. 32, lines 1-2:

a. Confirm that PG&E provided Cal Advocates with the names of at least four sources of information used for labor escalation and budget planning. See: GRC-2027-PhI_CalAdvocates_116-Q003Atch05; GRC-2027-PhI_DR_CalAdvocates_235-Q001Atch02 [identifying Mercer, AON, Willis Towers Watson, World at Work].

Public Advocates Office Response to Question 2:

Cal Advocates confirms that those four sources were included in the named response.

PG&E Question 3:

Referring to Cal Advocates Testimony, Exhibit CA-20, p. 32, lines 7-10:

- a. Provide all documents Cal Advocates reviewed to conduct its analysis of "wage percent change forecasts."
- b. Provide the "Utility Price and Wage Indicator of the Power Planner 2025 second quarter publication."



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- c. Provide all documents from ISH/Market Global Insight reviewed to conduct its analysis of labor escalation.
- d. Provide all documents for any “econometric forecasting firm” (CA-20, p. 32, footnote 142) reviewed to conduct its analysis of labor escalation.
- e. Confirm that the IHS/Market Global Insights document referred to at page 32, line 10 is the only third-party forecast information from a forecasting firm that Cal Advocates considered for its review of PG&E’s labor escalation.
- f. If Cal Advocates reviewed information from any other firm that provides forecasting information – including but not limited to Willis Towers Watson, AON, Mercer, and WorldatWork – then provide all information. Please exclude information PG&E provided to Cal Advocates in data responses.

Public Advocates Office Response to Question 3a-3d:

Please see Cal Advocates’ workpapers, A2505009 Public Advocates Office People (W. Yang) Compensation Benefits Part 1 of 3 (CA-20-WP), which were provided to PG&E in February 2026.

Public Advocates Office Response to Question 3e-3f:

IHS Markit/Global Insights was the only source that Cal Advocates consulted for its review of PG&E’s labor escalation.

PG&E Question 4:

Referring to Cal Advocates Testimony, Exhibit CA-20, p. 32, lines 7-10:

- a. Provide all documents Cal Advocates reviewed to conduct its analysis of “wage percent change forecasts.”
- b. Provide the “Utility rice (*sic*) and Wage Indicator of the Power Planner 2025 second quarter publication.”
- c. PG&E provided data request responses to Cal Advocates, including but not limited to PubAdv-PG&E-116-WY2, Q. 3b.; GRC-2027- PhI_CalAdvocates_235-Q001Atch02, and GRC-2027- PhI_DR_CalAdvocates_116-Q003.
- d. Does Cal Advocates contend that the information provided regarding labor escalation was not information the PG&E should have relied upon for its proposed labor escalation rate?
 - i. Provide a detailed explanation of all reasons Cal Advocates contends that PG&E should not have relied on this data to calculate the labor escalation rate.
- e. Does Cal Advocates contend that the forecast information from Willis Towers Watson is not a credible source of labor forecast information? If yes, provide all reasons for this conclusion.



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- f. Does Cal Advocates contend that PG&E should not have relied upon forecast information from Willis Towers Watson for its labor escalation proposal? If yes, provide all reasons for this conclusion.
- g. Does Cal Advocates contend that the forecast information from AON is not a credible source of labor forecast information? If yes, provide all reasons for this conclusion.
- h. Does Cal Advocates contend that PG&E should not have relied upon forecast information from AON for its labor escalation proposal? If yes, provide all reasons for this conclusion.
- i. Does Cal Advocates contend that the forecast information from Mercer is not a credible source of labor forecast information? If yes, provide all reasons for this conclusion.
- j. Does Cal Advocates contend that PG&E should not have relied upon forecast information from Mercer for its labor escalation proposal? If yes, provide all reasons for this conclusion.
- k. Does Cal Advocates contend that the forecast information from World at Work is not a credible source of labor forecast information? If yes, provide all reasons for this conclusion.
- l. Does Cal Advocates contend that PG&E should not have relied upon forecast information from World at Work for its labor escalation proposal? If yes, provide all reasons for this conclusion.

Public Advocates Office Response to Question 4a-4b:

Please see Cal Advocates' workpapers, A2505009 Public Advocates Office People (W. Yang) Compensation Benefits Part 1 of 3 (CA-20-WP), which were provided to PG&E in February 2026.

Public Advocates Office Response to Question 4c-4l:

Cal Advocates makes no contentions regarding whether these sources are credible or whether PG&E should have relied on them. The Commission has relied on IHS Markit/Global Insights as a credible source for labor escalation in past GRCs as was noted in CA-20, pp. 31-32. See Cal Advocates' workpapers, A2505009 Public Advocates Office People (W. Yang) Compensation Benefits Part 1 of 3 (CA-20-WP), for the citations to those Commission decisions.

PG&E Question 5:

Referring to Cal Advocates Testimony, Exhibit CA-20, p. 33, lines 7-9:

- a. Please confirm that Cal Advocates did not serve a discovery request to PG&E that requested disaggregated compensation data.

Public Advocates Office Response to Question 5:



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Cal Advocates notes that Exhibit CA-20, page 33, footnote 149 contains an error. Instead of citing Cal Advocates Exhibit CA-19, it should rather cite Exhibit CA-22, which covers the Total Compensation Study. This witness cannot comment on discovery carried out in Exhibit CA-22.

PG&E Question 6:

Referring to Cal Advocates Testimony, Exhibit CA-20, p. 34, Table 18-13:

a. Please provide all documents (including statistics, data calculations) Cal Advocates relied upon to in support of Table 18-13. This excludes information it received from PG&E

Public Advocates Office Response to Question 6:

Please see Cal Advocates' workpapers, A2505009 Public Advocates Office People (W. Yang) Compensation Benefits Part 1 of 3 (CA-20-WP), which were provided to PG&E in February 2026.

All responses prepared by Stacey Hunter.



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**PUBLIC ADVOCATES OFFICE
DATA RESPONSE
Pacific Gas & Electric Company Test Year 2027 General Rate Case
A.25-05-009**

Date: 18 March 2026 - Supplemental

Origination Date: 19 February 2026

Response Due: **10 March 2026**

To: Hannah Keller
cc: GRC@pge.com

GRC 2027 Coordinators:
GRCCaseCoordinators@pge.com

From: Dao Phan, Project Coordinator
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Data Request No: GRC-2023-Phi_DR_PGE_CalAdvocates015 Supplemental

GENERAL OBJECTIONS

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Cal Advocates objects to each instruction and data request as overly broad and unduly burdensome to the extent that it seeks documents or information that PG&E will possess when it receives Cal Advocates' opening testimony. Responding to such requests would be oppressive, unduly burdensome, and unnecessarily expensive, and the burden of responding to such requests is substantially the same or less for PG&E as for Cal Advocates. All such documents and information will not be produced.

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information or documents protected from disclosure by the attorney-client privilege, attorney work product doctrine, or any other applicable privilege.

PG&E Question 5 (original):

Referring to Cal Advocates Testimony, Exhibit CA-20, p. 33, lines 7-9:

a. Please confirm that Cal Advocates did not serve a discovery request to PG&E that requested disaggregated compensation data.

Public Advocates Office Response to Question 5 (original):

Cal Advocates notes that Exhibit CA-20, page 33, footnote 149 contains an error. Instead of citing Cal Advocates Exhibit CA-19, it should rather cite Exhibit CA-22, which covers the Total Compensation Study. This witness cannot comment on discovery carried out in Exhibit CA-22.

PG&E Question 5 (Supplemental):

[O]ur team was asking about discovery served by [Cal Advocates] in relation to compensation data referenced in CA-20, not CA-22.

Public Advocates Office Response to Question 5 (Supplemental):

Exhibit CA-20, pg. 33, lines 7-9 are part of a longer sentence which is copied in full below:

“As discussed in another section of Cal Advocates’ testimony, PG&E did not demonstrate that its proposed labor escalation rate reflects market conditions applicable to non-represented employees, nor did PG&E provide disaggregated compensation data sufficient to evaluate whether non-represented labor costs are growing at or above market levels.”**149** Footnote 149 reads: “See: Cal Advocates Exhibit CA-19.”

Cal Advocates’ response to PG&E’s data request #15, question 5, explained that “footnote 149 contains an error. Instead of citing Cal Advocates Exhibit CA-19, it should rather cite Exhibit CA-22, which covers the Total Compensation Study. This witness cannot comment on discovery carried out in Exhibit CA-22.”

PG&E’s data request question “in relation to compensation data referenced in CA-20” is irrelevant. The witness for Exhibit CA-20 relied on CA-22 which documented that PG&E’s Total Compensation Study did not support PG&E’s Labor Escalation Rate. As provided in its prior response, the witness for CA-20 cannot comment on discovery carried out as part of Exhibit CA-22. The witness for CA-20 did not issue any discovery requests for disaggregated compensation data because it was not within the scope of CA-20.

All responses prepared by Stacey Hunter.



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**PUBLIC ADVOCATES OFFICE
DATA RESPONSE
Pacific Gas & Electric Company Test Year 2027 General Rate Case
A.25-05-009**

Date: 14 April 2026

Origination Date: 7 April 2026

Response Due: **14 April 2026**

To: Hannah Keller
cc: GRC@pge.com

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Data Request No: GRC-2023-PhI_DR_PGE_CalAdvocates0053

GENERAL OBJECTIONS

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Cal Advocates objects to each instruction and data request as overly broad and unduly burdensome to the extent that it seeks documents or information that PG&E will possess when it receives Cal Advocates' opening testimony. Responding to such requests would be oppressive, unduly burdensome, and unnecessarily expensive, and the burden of responding to such requests is substantially the same or less for PG&E as for Cal Advocates. All such documents and information will not be produced.

Cal Advocates objects to each instruction and data request to the extent that it seeks



information or documents protected from disclosure by the attorney-client privilege, attorney work product doctrine, or any other applicable privilege.

PG&E Question 1:

At page 16, lines 18-19, Cal Advocates testifies, “Cal Advocates evaluated PG&E’s labor escalation assumptions for non-represented employees and the transparency of the supporting workpapers”:

- a. Please provide a detailed explanation of all steps in Cal Advocates’ process to evaluate PG&E’s “labor escalation assumptions.”
- b. Please provide a detailed explanation of all steps in Cal Advocates’ process to evaluate the “transparency of the supporting workpapers.”
- c. Please provide a listing of all the issues or subjects that Cal Advocates identified as part of its evaluation of the Total Compensation Study.
 - i. For each issue or subject identified, provide a detailed explanation of all the facts, opinions, and/or assumptions that Cal Advocates analyzed.
 - ii. For each issue or subject identified, provide an explanation of how the issue or subject supported Cal Advocates’ recommendation for the forecast to apply a reduced escalation rate for non-represented labor (Exhibit CA-22, p. 17, line 16). If the issue or subject did not factor into Cal Advocates’ conclusion regarding its labor rate reduction proposal, then please state so.
- d. Please provide listing of all documents that Cal Advocates reviewed, considered, and assessed as part of its evaluation of PG&E’s proposed labor escalation rate. Please include all third-party resources information (meaning all documents and information that Cal Advocates did not receive from PG&E). Please provide all documents in the list.

Public Advocates Office Response to Question 1:

- a. The steps in Cal Advocates’ process to evaluate PG&E’s “labor escalation assumptions” included Cal Advocates’ review of PG&E’s Total Compensation Study, specifically the table shown on page 7-4 in PG&E’s Exhibit 8 Chapter 7 which compares PG&E employees’ compensation to the market comparator groups.



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- b. The steps in Cal Advocates' process to evaluate the "transparency of the supporting workpapers" included Cal Advocates' review of PG&E's Total Compensation Study, specifically the table shown on page 7-4 in PG&E's Exhibit 8 Chapter 7 which compares PG&E employees' compensation to the market comparator groups.
- c. The "listing of all the issues or subjects that Cal Advocates identified as part of its evaluation of the Total Compensation Study" are found in Cal Advocates Exhibit CA-20. Cal Advocates' review of the Total Compensation Study (TCS) in CA-22 was limited to whether the TCS supported PG&E's requested Labor Escalation. Cal Advocates concluded that the TCS did not support the escalation rate proposed for PG&E's non-represented workforce. Please refer to Exhibit CA-20 where the recommendation for the overall labor escalation rate.
- d. Cal Advocates Exhibit CA-22 did not state that it conducted an "evaluation of PG&E's proposed labor escalation rate."

Response prepared by Amrisha Banarsee

PG&E Question 2:

At page 16, line 22 through page 17, line 3, Cal Advocates testifies, "PG&E did not provide verifiable documentation that demonstrated that its escalation assumptions reflect market conditions applicable to non-represented employees...."

- a. Please provide a detailed explanation of the "market conditions applicable to non-represented employees," as relied upon by Cal Advocates in its testimony.
- b. Provide all documents to support Cal Advocates' detailed explanation of the "market conditions applicable to non-represented employees."
- c. Please define "market conditions" as the term is used in Cal Advocates' testimony. Further, specifically confirm whether Cal Advocates is referring to an international market, United States Market, California Market, San Francisco Bay Area Market, and/or other market.
- d. Provide all documents relating to or referring to the market conditions as defined by Cal Advocates for purposes of this excerpt of testimony.

Public Advocates Office Response to Question 2:



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- a. PG&E's labor escalation rate of 3.75% is equal to the union-negotiated annual pay raise for PG&E's represented workforce. PG&E chose to apply the same annual pay raise to its non-represented workforce even though there is no indication that the non-represented workforce is below market in comparison to the comparator groups in the Total Compensation Study.
- b. See: GRC-2027-PhI_DR_CalAdvocates_110-Q006 and Q008.
- c. Cal Advocates' use of the term "market conditions" as the term is used in Cal Advocates' testimony" is based on PG&E's Total Compensation Study and the comparator groups to which PG&E was compared. These consist of a general group of California-based companies that are of similar sizes, in terms of numbers of employees, total annual revenue, etc. and a utility industry group of similar-sized utilities across the country.
- d. Refer to answer question 2b.

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PG&E Question 3:

At page 17, lines 4-7, Cal Advocates testifies, "In addition, Cal Advocates identified inconsistencies and gaps in PG&E's workpapers that limit the ability to validate PG&E's Total Compensation forecast, including unclear reconciliation between headcount assumptions, escalation assumptions, and incentive compensation components for non-represented employees."

- a. Please explain all of the steps the Cal Advocates employed to validate the Total Compensation forecast. Please explain what steps in this process in which Cal Advocates' ability to validate the Total Compensation forecast was limited.
- b. Please explain in detail all inconsistencies that Cal Advocates identified with the workpapers referenced in this testimony excerpt. Provide page and line references that contain the inconsistency.
- c. Please explain in detail all gaps that Cal Advocates identified with the workpapers referenced in this testimony excerpt. Provide page and line references that contain the gap.
- d. Please explain the information in PG&E's Total Compensation forecast and corresponding workpapers that led Cal Advocates to conclude there was an



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inconsistency and/or gap regarding “unclear reconciliation between headcount assumptions”.

- e. Please explain the information in PG&E’s Total Compensation Study and corresponding workpapers that led Cal Advocates to conclude there was an inconsistency and/or gap regarding “escalation assumptions”.
- f. Please list (by page number and line number) all the information in PG&E’s Total Compensation forecast and corresponding workpapers that led Cal Advocates to conclude there was an inconsistency and/ or gap regarding “incentive compensation components for non-represented employees”.
 - i. For each identify of information identified in the question above, explain how each entry led Cal Advocates to conclude there was an inconsistency or gap regarding “incentive compensation components for non-represented employees”.
 - ii. Provide all documents that support Cal Advocates testimony that there is an inconsistency or gap regarding “incentive compensation components for non-represented employees”.

Public Advocates Office Response to Question 3:

- a. Refer to the answer for questions 2b above.
- b. The inconsistencies are outlined in Cal Advocates’ testimony Exhibit CA-22, on pages 16-17.
- c. Refer to the answer for question 2a.
- d. The Willis Towers Watson (WTW) study is framed as a market competitiveness/benchmarking analysis and does not provide support for PG&E’s non-represented labor escalation assumption or a payroll forecast tie-out (Ex. PG&E-8 at 7-3, 7-4). The record further shows that the overall “above market” results are not representative of non-represented outcomes, as the represented vs. non-represented employee split indicates materially different market positioning for non-represented employees (Ex. PG&E-8 at 7-9). PG&E fails to sufficiently demonstrate why the overall “above market” results should apply to non-represented employees. In addition, Chapter 7 relies on survey sources and valuation methodology descriptions rather than disaggregated non-represented payroll data needed to evaluate whether non-represented labor costs are growing at/above market (Ex. PG&E-8 at 7-12, 7-13, 7-16). Chapter 7 provides population coverage/benchmarking scope information but does not reconcile forecast headcount assumptions, escalation application, and incentive components for non-represented employees into a traceable forecast bridge (Ex. PG&E-



8 at 7-8, 7-14), and also notes interpretive limitations/variability that further constrain using the study as direct proof of applicable non-represented market conditions (Ex. PG&E-8 at 7-6 to 7-7).

- e. Cal Advocates identified an inconsistency/gap regarding “escalation assumptions” because Exhibit PG&E-8, Chapter 7 is presented as a market competitiveness/benchmarking study and does not provide support for, or a direct linkage to, PG&E’s forecast labor escalation assumptions for non-represented employees (Ex. PG&E-8 at 7-3, 7-4). Chapter 7 reports “% above market” total compensation findings and discusses interpretation/variability in benchmarking outcomes, but it does not provide a traceable bridge from forecast headcount and payroll bases to the escalation factors applied in the Total Compensation forecast (Ex. PG&E-8 at 7-6 to 7-7). Chapter 7 also relies on survey sources and valuation mechanics (base salary and short-term incentives) rather than disaggregated non-represented payroll escalation support sufficient to validate the escalation assumptions used in the forecast (Ex. PG&E-8 at 7-12, 7-13, 7-16).
- f. Cal Advocates identified an inconsistency/gap regarding “incentive compensation components for non-represented employees” because in Exhibit PG&E-8, Chapter 7, PG&E discusses incentive compensation only within a benchmarking/valuation framework (e.g., short-term incentives in total compensation comparisons). PG&E does not reconcile the incentive components to PG&E’s non-represented Total Compensation forecast structure nor provide a clear mapping from non-represented headcount/payroll bases to incentive dollars (Ex. PG&E-8 at 7-3, 7-4, 7-14). The represented vs. non-represented split further indicates materially different market positioning, but PG&E does not sufficiently demonstrate how non-represented incentive components are reflected or validated within the forecast workpapers (Ex. PG&E-8 at 7-9). In addition, PG&E relies on survey sources and cash compensation valuation methodology for base and short-term incentive data rather than providing disaggregated non-represented incentive detail sufficient to validate the forecast’s incentive components (Ex. PG&E-8 at 7-12, 7-13, 7-16).

Response prepared by Amrisha Banarsee

PG&E Question 4:

At page 17, lines 8-9, Cal Advocates testifies, “Without the information required to validate these assumptions, PG&E has failed to meet its burden and demonstrate that its labor escalation assumption is reasonable”.

- a. Please identify all of the information that is “required” in order to validate a labor escalation assumption.



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- b. Please identify all of the “required” information that Cal Advocates did not receive to validate a labor escalation assumption.
- c. Confirm that Cal Advocates did not serve data requests seeking information that would allow Cal Advocates to analyze the labor assumption.
- d. Does Cal Advocates contend that PG&E failed to provide information regarding labor escalation proposals in this 2027 GRC that it provided in PG&E’s 2023 GRC and/ or 2020 GRC. If yes, please identify all the information that failed to provide this 2027 GRC to support a labor escalation proposal that is provided in the 2023 and/or 2020.

Cal Advocates Office Response to Question 4:

- a. Cal Advocates testifies, “Without the information required to validate these assumptions, PG&E has failed to meet its burden and demonstrate that its labor escalation assumption is reasonable” because PG&E is required to provide sufficient information to demonstrate that PG&E’s workforce is far enough below market to warrant pay raises that exceed a basic cost of living adjustment. PG&E’s TCS shows that PG&E’s workforce is above market pay by 13% in actual compensation and 11.9% in target compensation. PG&E’s Executives are 28.8% above market in target compensation (41.1% above market in actual compensation) and both the Director/Chief level and Manager/Principal/Supervisor level of PG&E management are at the market level. PG&E’s union-represented workforce is also compensated at levels much higher than market, but PG&E’s management negotiated the union wage increase. These facts indicate that the labor escalation rate for PG&E’s non-represented workforce does not merit an increase beyond a basic cost of living adjustment. As always, if PG&E management wishes to provide higher pay raises for its employees, represented or not, then shareholders can fund any amount over that authorized in this GRC and/or those amounts can be funded through increased efficiencies.
- b. PG&E did not provide sufficient information to validate PG&E’s non-represented labor escalation assumption. PG&E did not provide disaggregated non-represented payroll data or clear reconciliation showing how PG&E’s headcount, payroll base, escalation factor, and incentive components roll into the non-represented forecast. In addition, Exhibit PG&E-8, Chapter 7, is a market benchmarking study and does not demonstrate that PG&E’s escalation assumption reflects market conditions applicable to non-represented employees.
- c. Cal Advocates served data requests seeking information that would allow review of PG&E’s labor escalation assumption. For example, see GRC-2027-PhI_DR_CalAdvocates_110-Q006.



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- d. Cal Advocates has testified that PG&E has failed to meet its burden to provide sufficient support that demonstrates that its labor escalation assumption is reasonable. Cal Advocates' recommended adjustment is addressed in Cal Advocates' exhibit CA-20.

Response prepared by Amrisha Banarsee

PG&E Question 5:

At page 17, line 13, Cal Advocates testifies "In contrast, Cal Advocates reviewed independent utility wage forecasts that project labor cost growth below PG&E's proposed escalation rate.

- a. Please provide a detailed listing of all "independent utility wage forecasts" that Cal Advocates reviewed. Provide a copy of all information identified in this list.
- b. Did Cal Advocates limit its review only to forecasts that projected labor growth to a level below PG&E's proposed escalation rate?
- c. Does Cal Advocates contend that PG&E did not review independent wage forecasts for purposes of projecting labor cost growth?

Cal Advocates Office Response to Question 5:

- a. The forecast materials relied upon for Cal Advocates' recommendation are provided in CA-20.
- b. Please see exhibit CA-20.
- c. Please see exhibit CA-20.

Response prepared by Amrisha Banarsee

PG&E Question 6:

At page 17, lines 15-18, Cal Advocates testifies, "Cal Advocates recommends that PG&E's Test Year 2027 Total Compensation forecast apply a reduced escalation rate for non-represented labor below the assumed 3.75 percent level, to mitigate the risk of above-market labor cost growth and to better align compensation recovery with reasonable and supported cost assumptions."



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- a. Did Cal Advocates retain or in any way use a consultant to assist in the analysis of PG&E's Total Compensation Study? If so,
 - i. Provide the name of the consultant, the consultant's resume or curriculum vitae.
 - ii. All documents and information provided to the consultant by Cal Advocates related to the consultant's review of the Total Compensation Study.
 - iii. All documents that the consultant reviewed to analyze the Total Compensation Study.
 - iv. All communications between the consultant and Cal Advocates related to review of the Total Compensation Study.
- b. Provide Cal Advocates' specific recommendation for a labor escalation rate for non-represented labor.
 - i. Provide all bases for the recommended labor escalation rate.
 - ii. Provide all documents and information related to the recommended labor escalation rate.
 - iii. Provide all cost assumptions relied upon for the Cal Advocates' related labor escalation rate.
- c. Provide all bases for the recommendation for the Cal Advocates labor rate.
- d. Provide a detailed explanation of all cost assumptions that Cal Advocates considers to be reasonably supported.
- e. Provide all calculations of Cal Advocates proposed escalation rate.

Cal Advocates Office Response to Question 6:

- a. No.
- b. See Exhibit CA-20.
- c. See Exhibit CA-20.
- d. See Exhibit CA-20.
- e. See Exhibit CA-20.



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Response prepared by Amrisha Banarsee

PG&E Question 7:

Referring to Cal Advocates Exhibit CA-22, page 18, lines 1-12 (Witness Qualifications)

- a. Has the witness ever worked in a section of the Cal Advocates office that worked with labor or human resources issues?
- b. Has the witness ever been employed in any occupation that had as a function the preparation or review of total compensation studies? If yes, please identify place of employment, job title, and job description.
- c. Has the witness ever been employed in any occupation that had as a function the preparation or review of labor escalation rates? If yes, please identify place of employment, job title, and job description.
- d. Before submitting testimony in this PG&E 2027 GRC, has the witness ever submitted testimony regarding total compensation studies? If so, provide the proceedings and dates of submission of the testimony. Provide a copy of the testimony.
- e. Before submitting testimony in this PG&E 2027 GRC, has the witness ever submitted testimony regarding labor escalation rates? If so, provide the proceedings and dates of submission of the testimony. Provide a copy of the testimony.
- f. Before submitting testimony in this PG&E 2027 GRC, has the witness provided analysis of a total compensation study?
- g. Please provide the date of graduation from the University of California, San Diego.
- h. Provide a summary of the witnesses' education and experience in assessing labor escalation rates for an employment workforce, including, but not limited to, a non-represented workforce.

Cal Advocates Office Response to Question 7:

Cal Advocates objects to this question to the extent it calls for information that is irrelevant and beyond the scope of this proceeding. The witness' relevant education and work experience has already been provided in Exhibit CA-22. This proceeding is the witness' first General Rate Case. This witness was supervised and trained by a Cal Advocates supervisor with experience in HR



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and extensive experience analyzing HR in GRC proceedings. The witness graduated from the University of California, San Diego in 2024.

Response prepared by Amrisha Banarsee

PG&E Question 8:

Please confirm that Cal Advocates does not review PG&E's Total Compensation Study in CA-19 [See Cal Advocates CA -20, page 33, footnote 147 (indicating the Cal Advocates review PG&E's Total Compensation Study in CA-19)].

Cal Advocates Office Response to Question 8:

The referenced footnote is from Exhibit (Ex.) CA-20 and any questions related to that footnote should be directed to the witness responsible for Ex. CA-20. Cal Advocates can confirm that PG&E's Total Compensation Study was reviewed in Ex. CA-22.

Response prepared by Amrisha Banarsee



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**PUBLIC ADVOCATES OFFICE
DATA RESPONSE
Pacific Gas & Electric Company Test Year 2027 General Rate Case
A.25-05-009**

Date: 14 April 2026

Origination Date: 7 April 2026

Response Due: **14 April 2026**

To: Hannah Keller
cc: GRC@pge.com

GRC 2027 Coordinators:
GRCCaseCoordinators@pge.com

From: Dao Phan, Project Coordinator
Public Advocates Office
505 Van Ness Avenue, Room 4104
San Francisco, CA 94102 dao.phan@cpuc.ca.gov

Data Request No: GRC-2023-PhI_DR_PGE_CalAdvocates054

GENERAL OBJECTIONS

Cal Advocates objects to each data request to the extent that it mischaracterizes Cal Advocates' opening testimony.

Cal Advocates objects to each data request to the extent that it is overly broad, unduly burdensome, or not reasonably calculated to lead to the discovery of admissible evidence.

Cal Advocates objects to each instruction and data request as overly broad and unduly burdensome to the extent that it seeks documents or information that PG&E will possess when it receives Cal Advocates' opening testimony. Responding to such requests would be oppressive, unduly burdensome, and unnecessarily expensive, and the burden of responding to such requests is substantially the same or less for PG&E as for Cal Advocates. All such documents and information will not be produced.

Cal Advocates objects to each instruction and data request to the extent that it seeks



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information or documents protected from disclosure by the attorney-client privilege, attorney work product doctrine, or any other applicable privilege.

PG&E Question 1:

With regard to the previous witness (Yang) who submitted “Witness Qualifications” in support of Cal Advocates Exhibit CA-20:

- a. Provide a detailed educational background regarding the preparation, assessment, or in any way pertaining to the subject of labor escalation rates.
- b. Provide a list of all post-high school degrees or courses completed by witness in any way pertaining to the subject of labor escalation rates.
- c. Provide a list of all professional courses or seminars completed in any way pertaining to the subject of labor escalation rates.
- d. Provide a list of all work experience in any way pertaining to the subject of labor escalation rates.
- e. Provide a list of any trainings pertaining in any way to the subject of labor escalation rates.

Public Advocates Office Response to Question 1:

Cal Advocates objects to this question to the extent it calls for information that is irrelevant and beyond the scope of this proceeding. The witness’ relevant education and work experience has already been provided in Exhibit CA-20. This proceeding is the witness’ first experience covering labor escalation rates in a General Rate Case. This witness was supervised and trained by a Cal Advocates supervisor with experience in labor escalation rates and extensive experience analyzing HR issues in GRC proceedings. The witness holds a Master of Public Affairs degree from the University of California, Berkeley with an emphasis in electricity market and energy policy, and a Certificate in Engineering and Business for Sustainability from HAAS School of Business, University of California, Berkeley.

All responses prepared by Stacey Hunter



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**PUBLIC ADVOCATES OFFICE
DATA RESPONSE
Pacific Gas & Electric Company Test Year 2027 General Rate Case
A.25-05-009**

Date: 17 April 2026

Origination Date: 7 April 2026

Response Due: **14 April 2026**

To: Hannah Keller
cc: GRC@pge.com

GRC 2027 Coordinators:
GRCCaseCoordinators@pge.com

From: Dao Phan, Project Coordinator
Public Advocates Office
505 Van Ness Avenue, Room 4104
San Francisco, CA 94102 dao.phan@cpuc.ca.gov

Data Request No: GRC-2023-PhI_DR_PGE_CalAdvocates055

GENERAL OBJECTIONS

Cal Advocates objects to each data request to the extent that it mischaracterizes Cal Advocates' opening testimony.

Cal Advocates objects to each data request to the extent that it is overly broad, unduly burdensome, or not reasonably calculated to lead to the discovery of admissible evidence.

Cal Advocates objects to each instruction and data request as overly broad and unduly burdensome to the extent that it seeks documents or information that PG&E will possess when it receives Cal Advocates' opening testimony. Responding to such requests would be oppressive, unduly burdensome, and unnecessarily expensive, and the burden of responding to such requests is substantially the same or less for PG&E as for Cal Advocates. All such documents and information will not be produced.

Cal Advocates objects to each instruction and data request to the extent that it seeks



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information or documents protected from disclosure by the attorney-client privilege, attorney work product doctrine, or any other applicable privilege.

PG&E Question 1:

Provide any authority stating or concluding that the IHS Global Insight Power planner is the only authority accepted by the California Public Utilities Commission in the consideration of labor escalation rates.

Public Advocates Office Response to Question 1:

Cal Advocates made no such assertion and therefore has no such documentation.

PG&E Question 2:

Identify and provide all disaggregated compensation data that Cal Advocates prepared or relied upon to “evaluate whether non-represented labor costs are growing at or above market levels.” (CA- 20, p. 33, lines 6-11).

Public Advocates Office Response to Question 1:

This quote is on pg. 32 of CA-20, not on pg. 33. It begins, “As discussed in another section of Cal Advocates’ testimony...” The footnote citation is incorrect; it should refer to CA-22 rather than CA-19. The witness for CA-20 did not prepare or rely on any compensation data in evaluating the labor escalation rates except that provided in CA-22.

All responses prepared by Stacey Hunter