

Docket No.: A.25-05-009

Exhibit No.: CALCCA Ex-5

Date: May 5, 2026

Sponsor/Witness: PG&E (Various)

CALCCA EX-5
PG&E Responses to CalCCA DR Set 19

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

PG&E Data Request No.:	CalCCA_019-Q001
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_019-Q001
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Donna Barry – Energy Policy and Procurement

QUESTION 001

Refer generally to Exh. PG&E-17 at 7-32 to 7-42, where PG&E describes many benefits to the general public associated with PG&E’s hydro facility investments, including CAISO grid support and balancing, local area reliability, reliability during Public Safety Power Shutoff events, voltage support, black start capability, fulfillment of water rights and downstream water deliveries, environmental habitat for fish and other species, recreational uses, public safety, and water for fire protection and wildfire response:

- Do any of PG&E’s Utility Owned Generation assets included in a vintage subsequent to the legacy vintage provide any of the stated benefits?
- If so, please specify which facilities provide each benefit.
- Do any of PG&E’s contracted generation resources that are included in a vintage subsequent to the legacy vintage provide any of the stated benefits?
- If so, please specify which facilities provide each benefit.

ANSWER 001

- Yes.
- Colusa and Gateway provide CAISO grid support and balancing (ancillary services), and reliability during PSPS events, as shown in the Table below. Additionally, Gateway and Humboldt are local reliability resources.

Plant	# of Units	CAISO Resource	Name Plate Capacity (per SEC-10K)	Certified for Black Start	Certified For AS?	Certified for AS: Regulation Down	Certified for AS: Regulation Up	Certified for AS: Spin
Gateway	1	GATWAY_2_PL1X3	580.0	N	Y	Y	Y	Y
Colusa	1	COLUSA_2_PL1X3	657.0	N	Y	Y	Y	Y
Humboldt	10	HUMBPP_1_UNITS3, HUMBPP_6_UNITS	162.7	N		N	N	N

- Yes.
- PG&E objects to this question as overly broad and burdensome.

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

PG&E Data Request No.:	CalCCA_019-Q002
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_019-Q002
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Donna Barry – Energy Policy and Procurement

QUESTION 002

Refer generally to Exh. PG&E-17 at 7-32 to 7-42, where PG&E describes many benefits to the general public associated with PG&E’s hydro facility investments, including CAISO grid support and balancing, local area reliability, reliability during Public Safety Power Shutoff events, voltage support, black start capability, fulfillment of water rights and downstream water deliveries, environmental habitat for fish and other species, recreational uses, public safety, and water for fire protection and wildfire response:

- a. Which of these public benefits does the Helms facility provide?
- b. Does PG&E anticipate that the Helms facility will continue to provide those benefits listed in PG&E’s response to subpart (a) after its planned capacity expansion? Please explain why or why not.

ANSWER 002

- a. Helms provides all of the benefits listed except for black start capability. For the CAISO grid support and balancing, it provides the following ancillary service benefits:

Plant	# of Units	CAISO Resource	Certified for Black Start	Certified For AS?	Certified for AS: Regulation Down	Certified for AS: Regulation Up	Certified for AS: Spin	Certified for AS DAM: Non-Spin	Certified for AS RTM: Non-Spin
HELMS	3	HELM PG_7_UNIT 1, HELM PG_7	N	Y	Y	Y	Y	Y	Y

- b. Yes. There is no reason why it would not.

**PACIFIC GAS AND ELECTRIC COMPANY
2027 General Rate Case Phase I
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Data Response**

PG&E Data Request No.:	CalCCA_019-Q003
PG&E File Name:	GRC-2027-Phi_DR_CalCCA_019-Q003
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Donna Barry – Energy Policy and Procurement

QUESTION 003

Refer to Exh. PG&E-17 at 7-34, where PG&E states: “Anytime a resource is being considered for re-vintaging, and the resource is expected to continue economic operations for years after it is vintaged is reassigned, PG&E would ask the Commission to consider any cost shift that might occur if bundled customers alone are solely responsible for the going forward decommissioning costs”; refer also to Table RAM-11 on page 49 of CalCCA’s direct testimony: please confirm or deny that Table RAM-11 shows decommissioning costs being excluded from the revenue requirement CalCCA recommends be revintaged. If deny, please explain.

ANSWER 003

Deny in part. Table RAM-11 in CalCCA’s direct testimony, reproduced below, shows the revenue requirement for the facilities CalCCA proposes be re-vintaged but as noted in footnote 142 of this table, the \$0.0 values shown in decommissioning costs column for some facilities does not indicate there will be no decommissioning costs. Rather it reflects that PG&E has not yet estimated decommissioning costs for those projects, since PG&E’s conceptual estimate for hydroelectric decommissioning is based on the projects and powerhouses that are under 30 MW.

**Table RAM-11
Revenue Requirement of Proposed Revintaged Hydro Facilities**

Facility	2027 Rev. Req. (\$ million)	Decommissioning Cost (\$ million)¹⁴²	2027 Rev. Req. to Revintage (\$ millions)
Upper NF Feather River	\$103.4	\$0.0	\$103.4
DeSabra-Centerville	\$27.7	\$9.5	\$18.2
McCloud-Pit	\$62.1	\$0.0	\$62.1
Drum-Spaulding	\$171.5	\$0.0	\$171.5
Kerckhoff 2	\$30.3	\$0.0	\$30.3
Phoenix	\$8.9	\$0.0	\$8.8
Balch	\$23.7	\$0.0	\$23.7
Helms	\$89.2	\$0.0	\$89.2
Total	\$516.8	\$9.5	\$507.3
Total Hydro UCC			\$1,127.7

PACIFIC GAS AND ELECTRIC COMPANY
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PG&E Data Request No.:	CalCCA_019-Q004
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_019-Q004
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Ned Allis – Finance

QUESTION 004

Refer to Exh. PG&E-22 at 9-24 to 9-25, where PG&E generally describes how it used book reserve to calculate depreciation rates and theoretical reserve to calculate the composite remaining lives for its hydro assets: Please describe the impact to the revenue requirement or any other element of PG&E’s requests in this case of the approximately \$500 million difference between book reserve used to calculate depreciation rates and theoretical reserve used to calculate the composite remaining lives.

ANSWER 004

There is no revenue requirement impact to PG&E’s revenue requirement request, or any other element of PG&E’s filing, of the calculated difference between the theoretical reserve and book reserve.

The theoretical reserve is not used for the depreciation calculations. PG&E does not calculate the theoretical reserve in order to calculate the composite remaining life of its hydro assets. The remaining life for each vintage is calculated based on the estimated survivor curve. The composite remaining life for each depreciable group (account or location) is calculated using average service life weighting consistent with the formulas set forth on page 138 of NARUC’s *Public Utility Depreciation Practices*. The workpapers for the depreciation study show the theoretical future accruals, which are the sum of the original cost multiplied by the remaining life divided by the average service life for each vintage. This amount is used for the average service life weighting of remaining lives and, while the theoretical reserve can be mathematically calculated from the theoretical future accruals, the theoretical reserve does not impact the calculation of composite remaining life or depreciation rates.

**PACIFIC GAS AND ELECTRIC COMPANY
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PG&E Data Request No.:	CalCCA_019-Q005
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_019-Q005
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Rebecca Doidge – Generation

QUESTION 005

Refer to Exh. PG&E-17 at 7-22 where PG&E states: “For hydroelectric projects that are being retired and decommissioned, three conditions must be met before accounting retirement of powerhouse facilities: (1) permanent cessation of power generation, (2) FERC approval of license surrender (if the project has a FERC license), and (3) California Independent System Operator (CAISO) authorization of permanent retirement”:

- a. If these three conditions were adopted by the Commission in a prior decision or were imposed by state statute, please provide the relevant citation. If these three conditions were developed by PG&E, please explain when and how these criteria were developed.
- b. Has PG&E made a permanent retirement request of CAISO for Coal Canyon, Lime Saddle, Kerckhoff 1, Potter Valley, San Joaquin #1A, San Joaquin #2, San Joaquin #3, Centerville, Inskip, and Hamilton Branch powerhouses? If so, provide the date of the request. If not, why not? Please provide a response for each powerhouse.

ANSWER 005

- a. These criteria are PG&E’s interpretation of accounting rules. The process for accounting retirement has been developed over the course of many months as projects were reaching these milestones and PG&E began implementing retirements.
- b.

Powerhouse	Status
Coal Canyon	Yes. Date of CAISO permanent retirement is unknown, but Coal Canyon was removed from the CAISO Participating Generation Agreement and Meter Service Agreement on 3/8/2013.

Lime Saddle	Yes, effective December 21, 2023
Kerckhoff1	No. Kerckhoff 1 powerhouse is part of an active proceeding at FERC. Once PG&E has authorization from FERC to decommission the powerhouse, we will submit a permanent retirement application with CAISO.
Potter Valley	No. Potter Valley powerhouse is part of an active proceeding at FERC. Once PG&E has authorization from FERC to decommission the powerhouse, we will submit a permanent retirement application with CAISO.
San Joaquin #1A	No. PG&E has not yet made a decision whether to repower San Joaquin #1A powerhouse. See response to CalCCA_013-Q006.
San Joaquin #2	No. PG&E has not yet made a decision whether to repower San Joaquin #2 powerhouse. See response to CalCCA_013-Q006.
San Joaquin #3	No. PG&E has not yet made a decision whether to repower San Joaquin #3 powerhouse. See response to CalCCA_013-Q006.
Centerville	No. Centerville powerhouse is the subject of active sale negotiations.
Inskip	No. Inskip powerhouse will be included in the license surrender application to FERC for the Battle Creek project. Once PG&E has authorization from FERC to decommission the powerhouse, we will submit a permanent retirement application with CAISO.
Hamilton Branch	No. Hamilton Branch powerhouse is part of an active sale currently being reviewed under a Section 851 application at the CPUC.

**PACIFIC GAS AND ELECTRIC COMPANY
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PG&E Data Request No.:	CalCCA_019-Q006
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_019-Q006
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Kerry Hegarty – Finance, Parts a-c Rebecca Doidge – Generation, Part d

QUESTION 006

Refer to Exh. PG&E-17 at 7-23, where PG&E states: “PG&E agrees that the Coal Canyon and Lime Saddle powerhouses should be retired and has committed to correcting the error. However, the water conveyance and storage facilities are still used and useful until such time as they are physically decommissioned and become non-operational”:

- a. Please provide the gross plant amount for the water conveyance and storage facilities at Lime Saddle and Coal Canyon as of December 31, 2024.
- b. Is it PG&E’s position that the water conveyance and storage facilities will not be adjusted out when correcting the omission of the retirement of the Lime Saddle and Coal Canyon powerhouses in a future RO model run? If so, please explain.
- c. If so, does PG&E plan to supplement its DR responses to CalCCA 002-006 and 002-007 where it stated that “In responding to this data request, PG&E discovered that it had not yet retired [Lime Saddle/Coal Canyon] from the accounting records. [Lime Saddle/Coal Canyon] gross plant, accumulated depreciation, accumulated deferred income taxes, and depreciation expense have not yet been adjusted out of the revenue requirement. PG&E plans to correct this error in an upcoming errata filing”?
- d. For each of the Lime Saddle and Coal Canyon facilities, please indicate if they have met the following criteria:
 - i. Permanent cessation of power generation;
 - ii. FERC approval of license surrender (if the project has a FERC license); and
 - iii. California Independent System Operator (CAISO) authorization of permanent retirement.

ANSWER 006

- a.

Facility	Asset Type	Dec. 31 2024 Plant
Coal Canyon	Water Conveyance	\$6,158,883
Lime Saddle	Water Conveyance and Storage Facilities	\$13,583,313
Lime Saddle	Power House (required for safe water management)	\$477,035
Lime Saddle	Road and Bridges	\$1,391,777

- b. Yes, the water conveyance and storage facilities are still operational and necessary for safe water management. Even though Lime Saddle powerhouse is not generating electricity, water continues to flow through components of the powerhouse, because it acts as the low level outlet for the dam. Additionally, access to the facilities is still needed while they are operational.
- c. Yes, PG&E will supplement its responses to DRs CalCCA 002-006 and 002-007 to indicate the scope of the assets that were retired as part of PG&E's errata correction.
- d. Lime Saddle and Coal Canyon powerhouses are no longer generating and have been permanently retired with CAISO. See PG&E's response to CalCCA_019-Q005, subpart b. There is no FERC license for these facilities.

**PACIFIC GAS AND ELECTRIC COMPANY
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PG&E Data Request No.:	CalCCA_019-Q007
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_019-Q007
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Rebecca Doidge – Generation

QUESTION 007

Refer to Exh. PG&E-17 at 7-22, where PG&E states: “For hydroelectric projects that are being retired and decommissioned, three conditions must be met before accounting retirement of powerhouse facilities: (1) permanent cessation of power generation, (2) FERC approval of license surrender (if the project has a FERC license), and (3) California Independent System Operator (CAISO) authorization of permanent retirement”:

- a. Confirm or deny: the decision to cease generation at a particular powerhouse is fully within PG&E’s control. If denied, please explain.
- b. Confirm or deny: the decision to pursue a FERC license surrender at a particular powerhouse is fully within PG&E’s control. If denied, please explain.
- c. Confirm or deny: the decision to pursue a CAISO authorization of permanent retirement at a particular powerhouse fully is within PG&E’s control. If denied, please explain.

ANSWER 007

- a. Confirmed.
- b. Confirmed.
- c. Confirmed.

**PACIFIC GAS AND ELECTRIC COMPANY
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PG&E Data Request No.:	CalCCA_019-Q008
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Request Date:	April 13, 2026
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Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Rebecca Doidge – Generation

QUESTION 008

Refer to Exh. PG&E-17 at 7-23 to 7-24, where PG&E states: “For the remaining nine powerhouses that CalCCA suggests removing from the revenue requirement, PG&E will follow the established process for retirement. When and if they have met the three criteria: facilities are non-operational, receipt of FERC approval, and receipt of CAISO approval, the facilities will be retired. Until those 2 criteria are met, PG&E still has obligations related to those facilities”:

- a. Confirm or deny: until non-operational hydro assets are retired from PG&E’s books, PG&E will continue to earn a return on any undepreciated net plant balance associated with those plants. If denied, please explain.
- b. Confirm or deny: in circumstances where a Section 851 filing is not required, PG&E will not adjust its authorized revenue requirement to reflect the retirement of any non-operational hydro assets until the subsequent GRC. If denied, please explain.
- c. Confirm or deny: until non-operational hydro assets are retired from PG&E’s books, PG&E will continue to recover any operational and maintenance costs associated with those plants that were forecasted in a prior GRC. If denied, please explain.
- d. Confirm or deny: there is time and expense required to decide to sell or retire hydro assets. If denied, please explain.
- e. Confirm or deny: there is time and expense required to pursue a FERC license surrender application. If denied, please explain.
- f. Confirm or deny: there is time and expense required to pursue a CAISO permanent retirement request. If denied, please explain.

ANSWER 008

- a. Confirmed, as PG&E still has obligations related to such facilities.
- b. Confirmed. GRC revenue requirements are determined for a given rate case period based on the adopted test year plant and accumulated depreciation. With the exception of balancing account eligible categories, there is no interim mechanism to

update existing GRC revenue requirements based on differences between actual and forecast activity, including retirements.

- c. Confirmed. See the response to part b.
- d. Confirmed. A typical sale transaction would incur costs like title company fees, outside counsel support, and internal staff time. PG&E includes these transaction costs in its Section 851 application to the Commission seeking approval of a sale.
- e. Confirmed. PG&E typically uses consultant support and internal staff time to develop the studies and necessary support for its license surrender application to FERC.
- f. Confirmed. PG&E typically uses internal staff time to prepare a CAISO permanent retirement request. The process is relatively short and can be completed within a single working day.

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PG&E Witness(es):	Rebecca Doidge – Generation

QUESTION 009

Refer to Exh. PG&E-17 at 7-22 to 7-24, where PG&E generally discusses that its retirement criteria have not yet been met for the following 9 powerhouses: Kilarc-Cow Creek, Kerckhoff 1, Potter Valley, San Joaquin #1A, San Joaquin #2, San Joaquin #3, Centerville, Inskip, and Hamilton Branch.

- a. For each of 8 of those 9 powerhouses (not including Hamilton Branch, which is part of an active sale process), has PG&E evaluated a potential sale of the asset at any time since the asset became non-operational? If so, please provide the approximate date, the conclusion, and supporting documentation of that evaluation. If not, why not?
- b. For each of 8 of those 9 powerhouses (not including Kilarc-Cow Creek for which PG&E is pursuing a FERC license surrender and decommissioning), has PG&E evaluated a FERC license surrender and/or decommissioning of the asset at any time since the asset became non-operational? If so, please provide the approximate date, the conclusion, and supporting documentation of that evaluation. If not, why not?
- c. For each of 8 of those 9 powerhouses (not including Kilarc-Cow Creek for which PG&E has received CAISO permission for permanent retirement), has PG&E evaluated submitting a CAISO permanent retirement request? If so, please provide the approximate date, the conclusion, and supporting documentation of that evaluation. If not, why not?

ANSWER 009

- a. and b.

See the table below for specific responses for each powerhouse. PG&E would typically attempt to sell a hydroelectric project before seeking FERC license surrender and permanent retirement, since selling could be a lower cost alternative. If a sale or transfer is unsuccessful for any reason, PG&E would determine whether to continue to own and operate or whether to pursue license surrender with FERC (if the project is FERC-licensed).

- c. PG&E's process for requesting mothball status or permanent retirement status at CAISO for powerhouse assets depends on the status of sales and/or the status of the FERC license surrender order. It is better to put a powerhouse in mothball status during an active sale process so that the new owner can retain deliverability at the site. For projects that are part of a license surrender or decommissioning, CAISO permanent retirement requests are submitted after FERC provides an order approving a request to decommission.

Powerhouse(s)	Background or Current Status on Sale, License Surrender and CAISO Permanent Retirement
Kilarc-Cow Creek	PG&E had already filed its license surrender application with FERC on 5/12/2009 before the powerhouses were non-operational, so sale was not a feasible alternative.
Kerckhoff 1	<p>PG&E has applied to relicense the project with FERC in order to continue operating Kerckhoff #2 powerhouse; PG&E filed its license application on 6/26/2020. Kerckhoff #1 would not be separable from the rest of the project in order to be sold to another party.</p> <p>PG&E has not yet received the order from FERC authorizing decommissioning of Kerckhoff 1, so it has not submitted a permanent retirement request to CAISO.</p>
Potter Valley	<p>PG&E attempted to sell the Potter Valley project over the period of multiple years leading up to the withdrawal of its Notice of Intent and Pre Application Document to formally discontinue the licensing process on 1/25/2019. Parties participated in FERC's orphan process to attempt to take ownership of the project but were ultimately unsuccessful. PG&E filed a License Surrender Application on 6/29/2025.</p> <p>PG&E has not yet received the FERC order authorizing decommissioning, so it has not submitted a permanent retirement request to CAISO.</p>
San Joaquin #1A San Joaquin #2 San Joaquin #3	<p>Regarding potential for sale of the project, PG&E initiated a Request for Offers process for the Crane Valley project on 9/16/2021, but the sale was paused in 2022 and has not been reinitiated.</p> <p>PG&E has not conducted detailed evaluations of decommissioning of San Joaquin #1a, #2, or #3. A high-level estimate of decommissioning the entire Crane Valley Project was considered prior to the launch of the sale in 2021, and it was determined that divestiture was a preferred alternative.</p> <p>PG&E has not submitted a CAISO permanent retirement request for San Joaquin 1a, 2 or 3 because PG&E has not made a</p>

Powerhouse(s)	Background or Current Status on Sale, License Surrender and CAISO Permanent Retirement
	<p>decision whether to repower the powerhouses. Refer back to PG&E’s response to CalCCA_013-Q006 for the current status of evaluation of whether to return the powerhouses to service.</p>
Centerville	<p>Centerville is the subject of active negotiations for sale of the overall DeSabra-Centerville project; PG&E originally initiated a sale of the DeSable-Centerville project in 2017, but the sale was unsuccessful. A new Request for Offers process was initiated in late 2025 to identify a prospective buyer.</p> <p>While PG&E has considered decommissioning of the Centerville development in the past, it was determined that divestiture is a preferred alternative.</p> <p>PG&E has not filed with CAISO for permanent retirement since the project is subject of an active sale.</p>
Inskip	<p>In 2017, PG&E announced publicly the decision that it would not seek to relicense Battle Creek project when it expires in 2026. No parties were interested in taking ownership of the project, so PG&E formally informed FERC of its decision not to relicense the project on 10/23/2020.</p> <p>PG&E will submit the License Surrender Application and Decommissioning Plan to FERC currently scheduled in May 2028.</p> <p>PG&E has not yet received the FERC order authorizing decommissioning, so it has not submitted a permanent retirement request to CAISO.</p>
Hamilton Branch	<p>Hamilton Branch is not a FERC-licensed project. PG&E has not filed with CAISO for permanent retirement since the project is the subject of an active sale.</p>

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PG&E Witness(es):	Kerry Hegarty – Finance, part a and b. Rebecca Doidge – Generation, part c.

QUESTION 010

Refer to Exh. PG&E-17 at 7-24, where PG&E states: “As of December 31, 2025, PG&E received authorization from CAISO for retirement of Kilarc and Cow Creek powerhouses, and per PG&E’s process, the powerhouse components of the project will be retired”:

- a. Please provide the gross plant amount for the water conveyance and storage facilities at Kilarc-Cow Creek as of December 31, 2024.
- b. Is it PG&E’s position that the water conveyance and storage facilities will not be adjusted out when reflecting the retirement of the Kilarc-Cow Creek powerhouses in a future RO model run? Please explain.
- c. For Kilarc-Cow Creek, please indicate if it has met the following criteria:
 - i. Permanent cessation of power generation;
 - ii. FERC approval of license surrender (if the project has a FERC license); and
 - iii. California Independent System Operator (CAISO) authorization of permanent retirement.

ANSWER 010

a.

Facility	Asset Type	Dec. 31, 2024 Plant
Kilarc-Cow Creek	Water Conveyance and Storage Facilities	\$6,017,390
Kilarc-Cow Creek	Roads	\$105,056

- b. Yes, the water conveyance and storage facilities are still operational until PG&E performs physical removal as authorized in the FERC license surrender order.

- c. Kilarc and Cow Creek powerhouses have both ceased generation. The FERC order to decommission the project has been received. CAISO authorization for permanent retirement of the powerhouses has been received.

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PG&E Data Request No.:	CalCCA_019-Q011
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PG&E Witness(es):	Donna Barry – Energy Policy and Procurement

QUESTION 011

Refer to Exh. PG&E-17 at 7-43, where PG&E states: “Operational changes in response to market conditions do not constitute a change in the generation assets’ primary function(s). CalCCA’s lack of understanding of the Commission’s prudent manager standard for managing PG&E’s portfolio of generation resource portfolio contributes to its faulty conclusion and recommendations. PG&E’s dispatch and bidding protocol needs to meet is a least cost dispatch standard, as required by PG&E’s Bundled Procurement Plan”:

Please clarify if PG&E believes that CalCCA is recommending PG&E change its dispatch of its hydro fleet going forward, that CalCCA recommends PG&E not follow least cost dispatch, and/or that CalCCA is critiquing the change in operation of PG&E’s hydro fleet over the past 10- 15 years as imprudent or misaligned with the Commission’s prudent manager standard. If PG&E believes CalCCA holds any of these positions, please reference where in testimony CalCCA made such arguments.

ANSWER 011

PG&E would first like to establish what it believes. PG&E believes CalCCA was not aware that it is the CAISO that dispatches PG&E’s generation resource portfolio rather than PG&E and that the utility’s adherence to the least cost dispatch (LCD) Standard of Conduct 4 requires it to bid and schedule its portfolio of resources in the CAISO day-ahead market in a manner that minimizes costs for all ratepayers.

PG&E does not believe CalCCA is recommending PG&E change its dispatch of its hydro fleet going forward.

Nor does PG&E believe CalCCA recommend it should not follow LCD.

PG&E also does not think CalCCA is necessarily critiquing PG&E as acting imprudently.

PG&E simply notes that the quoted rebuttal testimony speaks only to PG&E’s opinion that CalCCA would not take the position that operational changes in response to market conditions constitute a change in a generation asset’s primary function if CalCCA understood PG&E’s obligations under LCD and its obligations to comply with Commission’s prudent manager standard.

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PG&E Witness(es):	Donna Barry – Energy Policy and Procurement

QUESTION 012

Refer to Exh. PG&E-17 at 7-39, where PG&E states: “CalCCA’s testimony assertion that there are incremental capacity investments in PG&E’s 2027 GRC hydro investment plan is inaccurate, undocumented, and misleading”: Please provide a reference to where CalCCA claimed incremental capacity investments were included in this GRC.

ANSWER 012

PG&E has re-reviewed CalCCA’s testimony and did not find a direct assertion by CalCCA that there was an incremental capacity investment for any specific hydro facility.

PG&E may have been reacting to CalCCA’s critique on page 22, that states, despite PG&E’s claims to the contrary, PG&E’s proposed investments in eight of these facilities implicate several of the Commission’s re-vintaging triggers.

The exact quote from CalCCA’s Testimony in on page 22, lines 6 – 9:

Despite PG&E’s assertion in testimony that none of its proposed investments in its PCIA-eligible generation assets will result in an asset life extension, a capacity addition, or a change in function, *PG&E’s proposed investments in eight of these facilities implicate several of the Commission’s revintaging triggers.* (Emphasis added)

PG&E does acknowledge that CalCCA’s testimony did not call out capacity addition(s) specifically in its critique of PG&E’s position, but it was one of the listed re-vintaging triggers that was being evaluated and as such, was implicated.

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

PG&E Data Request No.:	CalCCA_019-Q013
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_019-Q013
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Ned Allis – Finance, Part a Donna Barry – Energy Policy and Procurement, Parts b and c

QUESTION 013

Refer to Exh. PG&E-17 at 7-39 to 7-40, where PG&E states: “With respect to the term ‘new asset life extensions’, PG&E’s Opening Testimony noted that while there are relicensing applications pending approval at FERC for some of PG&E’s hydro facilities, the relicensing applications have not yet been approved and therefore, the exact term for the new licenses is unknown at this time”:

- a. Is the exact term of a new hydro license necessary before PG&E proposes a new depreciation end of life date?
- b. Is the exact term of a new hydro license necessary prior to PG&E being able to place that asset into a new PCIA vintage? If so, please explain why.
- c. In PG&E’s view, why is the fact that the exact term for the new license is unknown relevant to the question of PCIA vintaging?

ANSWER 013

- a. No. Please refer to page WP 9-35 of the workpapers supporting Chapter 9 of Exhibit PG&E-10 for an explanation of the process of estimating end of life dates for PG&E’s hydro facilities. When the term of a relicensing application is not known, PG&E has estimated the term based on the requested license extensions. Additionally, for some facilities, the end of life date is prior to the end of the FERC license.
- b. No. PG&E relies on the existing license as the basis for PCIA cost recovery.
- c. It is only relevant because CalCCA relies on a pending relicensing application to recommend re-vintaging.

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

PG&E Data Request No.:	CalCCA_019-Q014
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_019-Q014
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Ned Allis – Finance, Parts a & b, Donna Barry – Energy Policy and Procurement, Parts c & d

QUESTION 014

Refer to Exh. PG&E-17 at 7-40, where PG&E states: “Additionally, as a practicable matter, hydroelectric facilities do not have a clear end-of-life given PG&E must continue to comply with existing license requirements until FERC issues an order on its relicensing or surrender application”:

- a. Does the fact that a hydroelectric facility does not have a clear end of life prevent PG&E from determining a depreciable life for that hydro facility?
- b. Confirm or deny: the depreciable life of a hydro facility is the period of time over which PG&E plans to fully depreciate the original cost of the investment in that facility. If denied, please explain.
- c. Does the fact that a hydroelectric facility does not have a clear end of life prevent PG&E from estimating a future decommissioning cost for that facility?
- d. Does the fact that a hydroelectric facility does not have a clear end of life prevent PG&E from recovering from customers its estimated decommissioning cost?

ANSWER 014

- a. No. Depreciation and decommissioning are based on estimates.
- b. Deny. PG&E would define the depreciable life of a hydro facility to be the same as the Uniform System of Accounts definition of Service life: “*Service life* means the time between the date electric plant is includible in electric plant in service, or electric plant leased to others, and the date of its retirement”. PG&E uses group depreciation and does not depreciate each facility individually. However, group depreciation rates are estimated such that capital costs would be recovered over the service lives of the property.
- c. No.
- d. No.

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

PG&E Data Request No.:	CalCCA_019-Q015
PG&E File Name:	GRC-2027-Phi_DR_CalCCA_019-Q015
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Donna Barry – Energy Policy and Procurement

QUESTION 015

Refer to Exh. PG&E-17 at 7-40, where PG&E states: “Reclassing how the facility capital and expense costs necessary to support project operations are recovered from customers based on an end-of-life date proposal in an updated depreciation study is arbitrary and violates the principle of maintaining customer indifference”:

- a. Please elaborate on how revintaging a hydro facility based on an end-of-life date proposal in an updated depreciation study is arbitrary.
- b. Is the end of life date used to recover the original cost of the hydro facility investment also arbitrary?
- c. Is it PG&E’s position that a hydro asset can never be revintaged should its FERC license be extended perpetually? If not, under what specific conditions should revintaging be considered?
- d. If a hydro asset’s FERC license were perpetually extended, would each capital asset installed at that location eventually need to be replaced? If not, please explain.

ANSWER 015

- a. The facilities CalCCA recommends be re-vintaged are operating under existing FERC licenses, which are extended each year pending approval of PG&E’s Relicensing Applications.

The expected retirement date in the updated depreciation study is relying on an event (FERC granting a 50-year license term) that has not yet happened.

Also, CalCCA’s recommendation to re-vintage is premised on the idea that the asset life has been extended through FERC’s actions, but this event has not yet happened.

- b. It is not arbitrary, but the expected retirement date (end-of-life date) is a forecast future event that has not been finalized through a regulatory approval by FERC.

- c. Existing FERC licenses will not be extended perpetually, and resolution of the Relicensing Applications will necessarily conclude. However, PG&E's position is that re-licensing the facility should not be a triggering event for changing the vintage of the hydro powerhouses operating under the FERC license.

Re-vintaging can be considered if there are capacity additions. Re-vintaging might also be considered if a power plant's turbine and generator undergoes a major overhaul.

- d. The FERC licenses will not be extended into perpetuity, and resolution of the Relicensing Application will eventually conclude. In terms of capital replacement, the civil infrastructure associated with Hydro facilities (dams, tunnels) often lasts over 100 years, so not all capital assets would need to be replaced.

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

PG&E Data Request No.:	CalCCA_019-Q016
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_019-Q016
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Ned Allis – Finance, Part a Donna Barry – Energy Policy and Procurement, Parts b & c

QUESTION 016

Refer to Exh. PG&E-22 at 9-29, where PG&E generally discusses the process for starting to track accumulated depreciation at the hydro facility level and states “PG&E would need to determine the beginning accumulated depreciation at the facility level to be used going forward. This would involve allocating accumulated depreciation to the facility level, which in turn involves assumptions for the basis for allocation and effort to calculate these accumulated depreciation amounts”:

- a. Would the determination of the method for allocating accumulated depreciation from FERC accounts to the hydro facility have an impact on the revenue requirement associated with each hydro facility?
- b. In the event that the Commission ordered some hydro assets to be moved from the legacy vintage to a more recent vintage, would the determination of the method for allocating accumulated depreciation from FERC accounts to the hydro facility have an impact on the PCIA rates paid by bundled customers and departed load customers?
- c. Confirm or deny: the determination of the method for allocating accumulated depreciation from FERC accounts to the hydro facility level is a competitive issue between the IOUs and CCAs. If denied, please explain.

ANSWER 016

- a. Yes. The allocation of accumulated depreciation would impact the calculated remaining life depreciation rates. It would also impact the net plant balance for each facility.
- b. Yes.
- c. Deny. PG&E would not characterize this issue as a competitive issue.

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

PG&E Data Request No.:	CalCCA_019-Q017
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_019-Q017
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Eric Van Deuren – Generation

QUESTION 017

Refer to Exh. PG&E-17 at 3-39, where PG&E states: “CalCCA misinterprets PG&E’s proposal to hire more operators as a means to reduce overtime when in fact the primary purpose is to achieve two on-shift operators at each switching center, for all shifts.” Please also refer to Exh. PG&E-5 at 3-5, where PG&E states: “The additional staffing addresses three key challenges: – Fatigue management to address overtime and critical staffing challenges that threaten the ability to safely operate facilities. – Lone workers in remote areas are prevalent throughout the hydro territory and challenges personnel safety to get help during an emergency. – Creating a pipeline of Hydro operators to address departures when there is a 3-year lead time from the date of hire to become a qualified hydro operator”:

- a. Can PG&E reconcile these two passages? If so, please explain.
- b. Does PG&E plan to file an errata to update this portion of its direct testimony?

ANSWER 017

- a. Yes. PG&E’s current operator model requires extended shifts (i.e. overtime) if another operator is sick or otherwise unable to complete a shift. This causes fatigue. With additional staff on rotation, PG&E can better manage these extended shifts across a larger pool of operators.

An example of how the larger pool of operators can reduce fatigue caused by extended shifts: Today’s staffing typically requires that an operator extend their 12-hour shift to 18 hours or more to cover if a subsequent operator calls in sick. With a larger operator pool and two rested operators per shift, the second operator can cover the shift until a rested backup can be found. In the event no backup is available, the second operator would need to cover the shift alone, which is not ideal, but once the operator positions are fully staffed and qualified, this is expected to happen infrequently.

- b. No. See response to part a.

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

PG&E Data Request No.:	CalCCA_019-Q018
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_019-Q018
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Eric Van Deuren – Generation

QUESTION 018

Refer to Exh. PG&E-17 at 3-39, where PG&E states: “Historical rates of hiring and attrition are based on a totally different steady state hydro operator staffing plan that does not reflect PG&E’s urgency to address excessive fatigue and potential critical staffing shortages. PG&E is leveraging its Hydro Operator Training Program pipeline and actively hiring external hydro operators to achieve the full hiring plan within 2027”:

- a. Please provide the number of net new hydro operators added as of the date of your response since Dec. 31, 2024.
- b. Please provide the number of net new hydro operators PG&E plans to hire through the end of 2026 and in calendar year 2027.

ANSWER 018

- a. PG&E has added 6 net new hydro operators as of the end of March 2026.
- b. PG&E plans to hire 38 net new hydro operators and 4 net new hydro utility operators through the end of 2026 and in calendar year 2027.

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

PG&E Data Request No.:	CalCCA_019-Q019
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_019-Q019
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Eric Van Deuren – Generation

QUESTION 019

Refer to Exh. PG&E-17 at 3-40, where PG&E states: “Historical rates of hiring and attrition are based on a totally different steady state hydro operator staffing plan that does not reflect PG&E’s urgency to address excessive fatigue and potential critical staffing shortages. PG&E is leveraging its Hydro Operator Training Program pipeline and actively hiring external hydro operators to achieve the full hiring plan within 2027”:

- a. Please explain in depth all the steps PG&E is taking to ramp up hiring of hydro operators significantly in 2027, including when those steps are planned to be taken.
- b. How does leveraging the Hydro Operator Training Program pipeline support new hydro operator hiring?

ANSWER 019

- a. To develop fully qualified operators there are two paths available to PG&E. The first is to hire people who do not have operations experience and provide training through the Hydro Operator-in-Training (HOIT) apprentice program. The second is to hire provisional operators, who are experienced operators outside of PG&E, who complete a 6-month period learning the nuances of operating PG&E hydro systems before they become a qualified PG&E Hydro Operator. Both paths have been historically used to hire operators and will be leveraged to hire the additional needed staff. For example, PG&E’s next HOIT cohort is scheduled to begin training by early fall of 2026.

Hiring will start with posting positions for both provisional and apprentice operators. The number of provisional operators that we identify will set the number of apprentices we will hire. In addition, PG&E’s headcount forecast includes increased training staff to train a larger group of operators in both the apprentice and provisional programs as well as the continued refresher training.

- b. The HOIT Program is an apprentice program for developing fully qualified hydroelectric operators from entry-level hires, enabling sustained workforce growth while maintaining safety, reliability, and regulatory compliance. The HOIT pipeline

allows PG&E to hire candidates without prior hydro operations experience and systematically progress them to journey-level operators through a structured, state-approved apprenticeship framework.

The HOIT program is a jointly administered apprenticeship program between PG&E and the IBEW, approved and overseen by the Joint Apprenticeship Training Committee. It provides a predictable, scalable development path that supports increased hiring volumes while mitigating operational risk associated with onboarding inexperienced operators.

The HOIT program is a multi-year apprenticeship combining classroom instruction, simulator-based training, and extensive on-the-job training (OJT). The program includes foundational classroom training, simulator based operational training, and structured OJT. Leveraging the HOIT program supports new hydro operator hiring by:

- Expanding the candidate pool beyond experienced operators, enabling PG&E to hire entry-level candidates and develop them internally.
- Providing predictable throughput, allowing PG&E to plan multi-year staffing ramps aligned with forecasted retirements, attrition, and fatigue-related staffing risk.
- Maintaining operational safety and reliability by ensuring all operators meet standardized training, testing, and qualification requirements before independent operation.
- Allowing partial staffing contribution during training, as HOITs serve as second operators while progressing through the program, increasing near-term staffing resilience.

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

PG&E Data Request No.:	CalCCA_019-Q020
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_019-Q020
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Eric Van Deuren – Generation Rebecca Doidge – Generation

QUESTION 020

Refer to Exh. PG&E-17 at 3-38, where PG&E states: “Upon the actual sale or retirement of an asset, there may be adjustments to the staffing needs as well as capital and expense revenue requirements of the asset. These adjustments are correctly addressed in Section 851 filings. The Commission should reject CalCCA’s argument that PG&E’s hydro operator needs are overstated due to planned facility sale or retirement.” Please also refer to PG&E’s response to DR CalCCA 016-001, where it states: “PG&E estimates the average annual O&M savings at \$150,000. This estimate aligns with the current mothball status for the Hamilton Branch powerhouse and the associated water conveyance facilities”:

- a. Does PG&E plan to reduce its Electric Generation revenue requirement to reflect the estimated \$150,000 in hydro operator expense savings from the sale of Hamilton Branch? If so, when and how does PG&E propose to do that? If not, why not?
- b. Does the forecasted hydro operator expense savings from the sale of Hamilton Branch reduce the need to hire any of the planned 97 net new hydro operators?
- c. Has PG&E calculated hydro operator expense savings in any previous Section 851 filing after the sale of a hydro facility, or in any retirement of a hydro facility not requiring a Section 851 filing? If so, please provide a reference to that calculation.

ANSWER 020

- a. CalCCA misstates PG&E’s savings as “hydro operator expense savings”. PG&E’s response in DR CalCCA 016-001 indicates “average annual O&M savings at \$150,000.”

PG&E objects to this request as it is outside the scope of the 2027 GRC proceeding. Consideration of savings due to the sale of Hamilton Branch Hydroelectric Project will be reviewed by the Commission in A.26-02-018.

Subject to that objection and without waiving its right to object to the use of its response in this proceeding, PG&E cites the following testimony from the Hamilton Branch Section 851 filing:

Upon the close of the sale, PG&E proposes to adjust the revenue requirement associated with the sale and retirement of the Project by recording a reduction, or a credit entry, in the [Portfolio Allocation Balancing Account] PABA. The base revenue reduction in PABA will be applied to the months remaining in the respective General Rate Case periods at the close of the sale.¹

- b. CalCCA misstates PG&E's savings as "hydro operator expense savings". PG&E's response in DR CalCCA 016-001 indicates "average annual O&M savings at \$150,000."

To clarify, PG&E is not planning to hire 97 net new hydro operators. PG&E is requesting an additional 44 net new hydro operators and 4 net new hydro utility operators. Note that as of December 31, 2024, PG&E had 49 hydro operators.²

The sale of Hamilton Branch is not expected to reduce the need to hire any of the planned net new hydro operators or net new hydro utility operators.

- c. PG&E objects that this request is overbroad and unduly burdensome. Subject to that objection and without waiving its right to object to the use of its response in this proceeding, PG&E responds as follows: The projects that PG&E has sold have not been staffed with dedicated personnel, so the alternatives analysis included in Section 851 applications included operations and maintenance costs as a general category, and did not show costs specifically associated with hydro operators.

¹ A.26-02-019, p. 1-7, lines 21-25.

² GRC-2027-Phi_DR_CalCCA_005-Q011

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

PG&E Data Request No.:	CalCCA_019-Q021
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_019-Q021
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Eric Van Deuren – Generation

QUESTION 021

Refer to Exh. PG&E-17 at 3-15, where PG&E rebuts CalCCA’s proposal to include efficiency savings from waste elimination and efficiency improvement investments and states: “To the extent waste elimination activities are reflected in 2024 base expense planning orders—and they were—PG&E embedded those savings directly into its 2027 forecast”:

- a. Confirm or deny that the efficiency savings embedded in the forecast occurred in 2024. If denied, please explain.
- b. Does PG&E expect its waste elimination and efficiency improvement investments to produce incremental savings in 2025, 2026, 2027 and beyond? If not, why is it worthwhile to continue investing in waste elimination and efficiency improvements? If so, what is PG&E’s estimate of incremental O&M reductions attributable to waste elimination and efficiency improvement investments in 2025, 2026, and 2027?

ANSWER 021

- a. Confirmed.
- b. PG&E interprets incremental savings to mean forecast reductions from what it forecasted in the 2027 GRC. It is uncertain if waste elimination and efficiency improvement investments will result in forecast reductions in 2025, 2026, 2027 and beyond.

Waste elimination is ingrained in our normal business operations. Waste elimination and efficiency improvements are worthwhile because, absent the efforts, the costs to perform the same volume of work could be higher. PG&E will continue to use waste elimination as a tool to reduce unnecessary costs that do not benefit customers.

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

PG&E Data Request No.:	CalCCA_019-Q022
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_019-Q022
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Kerry Hegarty – Finance

QUESTION 022

Refer to Exh. PG&E-22 at 7-35 and the section titled “A Complete Restudy of CGI Plant Allocation Is Unnecessary and Wasteful”:

- a. How much time and effort does PG&E believe it would take to review the cost allocations for all CGI plant? Please provide the assumptions underpinning that estimate.
- b. How much time and effort does PG&E believe it would take to allocation gas general plant only to the gas utility and electric general plant only to the electric utility?

ANSWER 022

- a. PG&E’s efforts to comply with FERC Order No. 898 took approximately 10 months to implement and required a monthly process for continued oversight and review throughout 2025. These efforts included a comprehensive analysis of historical records to identify the assets in scope, detailed reviews conducted in partnership with PG&E’s accounting teams, representatives from PG&E’s electric functional areas and IT subject matter experts, updates to existing asset class settlement rules for in-flight projects, and training for project managers and other personnel on updated order asset class settlement rule procedures.

Establishing a similar process for all CGI plant, including CGI plant not subject to FERC Order No. 898 and assets that would potentially be assigned to the Gas functional areas, would likely require a similar level of time and effort.

Separately, since PG&E will not be able to record the gas costs in functionalized gas only FERC accounts, as this is not in line with FERC accounting requirements, this would be an offline analysis that would need to be periodically updated. Additionally, for any change to CGI allocation methodology, PG&E would need to seek approval in PG&E’s Transmission Owner rate case under FERC jurisdiction, to ensure that the methodology for recovery of shared CGI costs was consistent and eliminate the potential of any under or over collection of those costs.

- b. See the response to part a. The same considerations would apply to the gas general and electric general portions of CGI plant. PG&E does not have an estimate

of the total time and effort to analyze just that subset of assets but it could span several months.

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

PG&E Data Request No.:	CalCCA_019-Q023
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_019-Q023
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Rakesh Nigam – Customer and Enterprise Solutions

QUESTION 023

Refer to the Direct Testimony of Ryan Matley at 77-79 in the section discussing PG&E’s Billing Services fees: Please confirm or deny that PG&E did not submit rebuttal testimony on this topic. If denied, please provide a reference to that rebuttal.

ANSWER 023

PG&E confirms it did not submit rebuttal testimony on the topic of Billing Service fees in the 2027 GRC (A.25-05-009) as this topic is being rightfully discussed and handled in the ongoing 2023 GRC Phase II (A.24-09-014) proceeding.

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

PG&E Data Request No.:	CalCCA_019-Q024
PG&E File Name:	GRC-2027-Phi_DR_CalCCA_019-Q024
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Rebecca Madsen – Finance

QUESTION 024

Refer to Exh. PG&E-22 at 16-2, where PG&E states: “TURN’s proposal to change the interest rate used to calculate interest recorded in the Hydro Licensing Balancing Account (HLBA) to PG&E’s after-tax weighted average Cost of Capital (COC) from the 3-month commercial paper rate to incentivize better forecasting and timing of program spending associated with the activity recorded to the account, thereby resulting in lower balances”: Does PG&E pay or receive interest at the after tax weighted cost of capital on any other balancing account currently in use? If so, which accounts?

ANSWER 024

No, PG&E does not pay or receive interest at the after-tax weighted cost of capital on any balancing account currently in use.

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

PG&E Data Request No.:	CalCCA_019-Q025
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_019-Q025
Request Date:	April 13, 2026
Requester DR No.:	019
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 23, 2026
PG&E Witness(es):	Marques Cruz – Finance

QUESTION 025

To date, PG&E has agreed to make the following adjustments to the RO that are expected to impact the Electric Generation revenue requirement:

- Retirement of all assets associated with Chili Bar and Kern Canyon (Exh. PG&E-17 at 7-23)
 - Retirement of the Lime Saddle and Coal Canyon powerhouse assets (Exh. PG&E-17 at 7-23)
 - Retirement of the Kilarc and Cow Creek powerhouse assets (Exh. PG&E-17 at 7-24)
 - Removal of the Deferred Tax Asset associated with the Diablo Canyon Power Plant (Exh. PG&E-22 at 10-8)
 - Reclassification of CGI plant as a result of FERC Order 898 (Exh. PG&E-22 at 7-38)
 - Removal of Pit 1 costs for 2027 and 2028 from MWC 3H and therefore the hydro licensing balancing account (Exh. PG&E-17 at 7-15)
- a. When does PG&E propose to make each adjustment and provide an updated RO model with supporting detail for each adjustment?
 - b. If that update is provided after hearings, how does PG&E propose that intervenors be provided due process to cross-examine any company witnesses on those changes?

ANSWER 025

- a. PG&E has included the retirement adjustments for Chili Bar, Kern Canyon, Lime Saddle and Coal Canyon in the RO Model attached to the errata submission on April 16, 2026. The remaining adjustments have yet to be incorporated in the 2027 GRC RO Model, and PG&E currently does not have a schedule for when the next RO Model update will be.

- b. The currently-scheduled evidentiary hearings provide intervenors an opportunity to cross-examine PG&E witnesses regarding information relevant to the scoping memo issues, including the matters referenced above.