Docket No.: A.25-05-009

Exhibit No.: CALCCA Ex-6

Date: May 5, 2026

Sponsor/Witness: PG&E (Various)

CALCCA EX-6

PG&E Responses to CalCCA DR Set 20

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

PG&E Data Request No.:	CalCCA_020-Q001
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_020-Q001
Request Date:	April 24, 2026
Requester DR No.:	020
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 29, 2026
PG&E Witness(es):	Marques Cruz – Finance

QUESTION 001

Referring generally to PG&E's errata to Exhibit PG&E-10 submitted on April 16, 2026: Please explain in detail the change or changes to PG&E's Results of Operations model that resulted in the $7 million Electric Generation revenue requirement decrease reflected in this errata.

ANSWER 001

PG&E interprets the data request to refer to a variance between the November 2025 and April 2026 outputs of Results of Operations model. The $7 million reduction in PG&E Results of Operations Model is driven by:

1. Updating the authorized rate of return to reflect PG&E's recently authorized cost of capital per D.25-12-043. The update reduced the Net for Return percentage from 7.66% to 7.61%, driving an aggregate revenue requirement reduction of approximately $5 million related to the requested Net for Return, State Corporation Franchise taxes, and Federal Income taxes;
2. Updating the depreciation rates associated within Electric Generation asset classes EHP30200 and EIP30201. Associated depreciation rate calculations from PG&E's depreciation study inadvertently incorporated 2023 GRC retirement date information prior to the April 16, 2026 errata. Correcting the calculations resulted in a reduction of the depreciation rate from 2.64% to 2.17%, driving a revenue requirement reduction of approximately $2 million.

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

PG&E Data Request No.:	CalCCA_020-Q002
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_020-Q002
Request Date:	April 24, 2026
Requester DR No.:	020
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	May 1, 2026
PG&E Witness(es):	Donna Barry – Energy Policy and Procurement

QUESTION 002

Refer to PG&E's response to CalCCA Data Request 18.07(a), in which PG&E denies that the two most significant benefits associated with PG&E's hydro assets are their energy value and capacity value:

a. Please explain in detail how PG&E conceptualizes the listed FERC requirements (operational, environmental, etc.) as "co-equal benefits" of these resources.

b. Confirm or deny: PG&E's position is that the benefits associated with preventing safety hazards and environmental harms that may arise from mismanagement of a hydro resource are "co-equal benefits" with the energy and capacity products generated by the asset. If deny, please explain.

c. Are these FERC requirements that PG&E lists as benefits "co-equal benefits" in terms of net market value? If yes, please provide any supporting documentation for this position.

d. Are these FERC requirements that PG&E lists as benefits "co-equal benefits" in terms of how PG&E evaluates the value of the resource when it makes investment decisions related to the asset? If yes, please provide any supporting documentation for this position.

e. Can PG&E quantify any of these listed benefits? If so, please provide the quantification and all supporting workpapers.

f. Confirm or deny: if PG&E followed appropriate protocol to safely retire one if its hydro assets, that would be another way to avoid the safety hazards and environmental harms that may arise from mismanagement of a hydro resource. If deny, please explain.

ANSWER 002

a. The FERC license requirements listed in data request 18.07(a) response are prerequisites to generating energy and capacity value from the powerhouses, which puts the value of these benefits on par with the generation of energy and capacity

benefits. You cannot have one without the other and to do otherwise, would put PG&E's ability to operate the power houses at risk.

The conceptual benefits are described in the original data request response to 18.07(a) and revolve around maintaining water levels and flows in harmony with the natural environment, and in consideration of other stakeholder needs (recreation and downstream water rights), among other things.

Below, PG&E repeats a few of the "co-equal benefits" listed in the original response, which should convey a conceptualization of the benefit:

- Protecting aquatic habitats downstream through prudent management of water releases.
- Balancing water levels necessary for environmental or recreational needs.
- Ensuring dam safety through inspections, monitoring, and structural maintenance so as not to experience large uncontrolled water releases, which could have catastrophe consequences in terms of property loss and loss of life.
- Protect threatened or endangered species, often involving specific habitat restoration projects or studies.
- Management of lands and shoreline assets to control erosion and development.
- Mandated construction and maintenance of boat launches, fishing access, hiking trails, and picnic areas
- Implementation of plans to identify and protect archaeological or historic sites, often requiring a Historic Properties Management Plan.
- Stakeholder engagement and settlement agreements.

b. Confirm in part and deny in part. PG&E confirms that the benefits of complying with the FERC license terms and conditions are co-equal benefits with energy and capacity products generated by the power houses. When complying with the FERC license terms and conditions, PG&E's mindset is full compliance with both the spirit and letter of the license terms and conditions.

   Thus, PG&E denies (does not agree) with the negative framing in the question that suggests "preventing safety hazards and environmental harms that may arise from mismanagement of a hydro resource" are co-equal benefits. The negative framing does not comport with PG&E's approach and mindset when complying with both the spirit and letter of the FERC license terms and conditions.

c. Yes. The co-equal benefits are prerequisites to the powerhouses' energy and capacity product production, which are monetized in the CAISO day-ahead and real-time energy markets. Thus, the co-equal benefits, while not monetized directly in the CAISO day-ahead and real-time markets, do support the energy and capacity products generated by the power houses. You cannot have one without the other.

d. In terms of the cost / benefit analysis which is used to make decisions about whether to continue operations of a powerhouse, the cost to comply with the FERC license requirements is part of the assessment. See PG&E's response to Question 5 in this data request.

e. See PG&E's response to CalCCA Data Request 18.02(a). Also see PG&E's response to Question 6 in this data request.

f. PG&E objects to this question as being overly broad and vague. Notwithstanding this objection, PG&E responds as follows: Neither confirm or deny.

PACIFIC GAS AND ELECTRIC COMPANY
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Data Response

PG&E Data Request No.:	CalCCA_020-Q003
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_020-Q003
Request Date:	April 24, 2026
Requester DR No.:	020
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	May 1, 2026
PG&E Witness(es):	Donna Barry – Energy Policy and Procurement

QUESTION 003

Refer to PG&E's response to CalCCA Data Request 18.08: Confirm or deny: the VAMO mechanism only allows an LSE to receive an RPS benefit when they pay compensation for that benefit. If deny, please explain.

ANSWER 003

Confirm. For the voluntary allocation of RPS attributes, yes, all LSEs that elected shot-term and/or long-term attribute allocations pay compensation for the RPS attributes that are awarded, which is based on the RPS market price benchmark (MPB) used for PCIA ratemaking. The payment for the attributes is credited in Portfolio Allocation Balancing Account (PABA), resulting in lower above market costs for all bundled and non-exempt departing load customers.

The same outcome is true for PG&E's bundled customers – the bundled share of the voluntary allocation of RPS attributes results in a debit entry (expense) in the ERRA and a credit entry in PABA using the RPS MPB times the volume of attributes awarded, resulting in lower above market costs. For all bundled and non-exempt departing load customers.

PACIFIC GAS AND ELECTRIC COMPANY
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Data Response

PG&E Data Request No.:	CalCCA_020-Q004
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_020-Q004
Request Date:	April 24, 2026
Requester DR No.:	020
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	May 1, 2026
PG&E Witness(es):	Donna Barry – Energy Policy and Procurement

QUESTION 004

Refer to PG&E's response to CalCCA Data Request 18.09(c), and PG&E's statement that "PG&E ensures that total procurement to meet customer demand in the CAISO markets is at least cost": generally speaking, does PG&E procure resources to meet customer demand for all customers in the CAISO markets? If yes, please explain. If no, on behalf of what subset of customers in the CAISO markets does PG&E generally procure generation resources?

ANSWER 004

To put PG&E's response to CalCCA's DR 18.09(c) in context, below is the full paragraph from which the sentence fragment quoted in Q.4 above was excerpted:

> The fundamental principle of LCD is to ensure that PG&E's dispatchable resources are used when their incremental costs or opportunity costs are below the cost of energy in the CAISO wholesale markets. By appropriately scheduling and bidding its resources into the CAISO markets at their incremental or opportunity costs, *PG&E ensures that total procurement to meet customer demand in the CAISO markets is at least cost*. [1](Emphasis added).

The full paragraph describes how bidding and scheduling PG&E's resources into the CAISO markets at their incremental or opportunity costs ensures least cost dispatch of PG&E's resources is achieved in the CAISO market. Least cost dispatch in the CAISO market benefits all customers and PG&E's scheduling and bidding practices for its resources contributes a proportional share to the least cost outcome in the CAISO market.

[1] This language is reflected in PG&E's Commission-approved bundled procurement plan, Appendix K, Bidding and Scheduling Protocols, Cal. P.U.C. Sheet No. 165 and 166.

No, PG&E does not procure resources to meet demand for all customers. PG&E generally procures resources to meet bundled customer demand, with exceptions noted in response to CalCCA's Data Request 18.07(c).

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

PG&E Data Request No.:	CalCCA_020-Q005
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_020-Q005
Request Date:	April 24, 2026
Requester DR No.:	020
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	May 1, 2026
PG&E Witness(es):	Rebecca Doidge – Generation

QUESTION 005

Refer to PG&E's responses to CalCCA Data Requests 18.09(c)(v) and 18.11(d):

a. Please list the primary benefits and costs PG&E generally considers as it decides whether to sell, retire, or reinvest in a hydro asset.

b. Provide any documentation in PG&E's possession that supports PG&E's response to subpart (a). If there is none, please explain why.

c. Please explain in detail what kind of analysis PG&E conducts to assess the costs and benefits of different options available to PG&E when PG&E is considering whether to sell, retire, or reinvest in a hydro asset.

   i. What type of analysis is performed?

   ii. What costs and benefits are generally considered?

   iii. How are the primary benefits and costs generally considered valued?

ANSWER 005

a. The benefits PG&E considers, beyond generation revenue, include things like operational value (e.g., grid support), water management and flood control, downstream water use, community interests, recreational facilities, and environmental resource protection.

   The costs that are considered, beyond continued capital and expense forecasts, include things like regulatory and compliance risks (e.g., difficulty to implement new and increasing conditions in a FERC license or difficulty to obtain regulatory approval for sale or surrender); asset separability and geographic location; community and stakeholder interests (e.g., landowner concerns, impacts to downstream consumptive water delivery, impacts to environmental or recreational resources, etc.).

b. PG&E objects to this data request as overly broad 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: Not all analyses PG&E performs are

formally documented and, in those cases, PG&E's strategic direction for a particular project may be the result of working sessions but not documented analyses. See *"GRC-2027-PhI_DR_CalCCA_020-Q005Atch01.pdf"* through *"GRC-2027-PhI_DR_CalCCA_020-Q005Atch06.pdf"* for workpapers that were provided as part of the Section 851 applications for projects that have been divested. These alternatives analyses compare the costs of continuing to own and operate against decommissioning and selling.

c. When making a determination about the long-term strategy, each analysis is unique – some are more detailed than others. Generally speaking, our larger hydro facilities, with large storage capabilities and operational flexibility are economic, meaning they generate more revenue than it costs to run them. The long-term strategy for small hydro facilities, which typically require lots of infrastructure for very little generation benefit, may require a more detailed assessment.

   i. PG&E considers a variety of potential long-term solutions – continue to own and operate, partial retirement, surrender of FERC license and decommission, transfer to a natural buyer, public request for offers to sell, or some combination of those strategies. While PG&E reviews the economic value of the project, it is not the only factor used in the decision making. Many of the benefits and costs listed in subpart a are not quantifiable but they may impact what PG&E decides to do with the project.

   ii. See response to subpart a for a description of the costs and benefits.

   iii. Primary benefits are the revenues derived from the assets, mostly generation revenue, but if there are water delivery or other contracts that generate revenue, they are considered too. Most of the other benefits described in subpart a do not have an economic value associated with them. Depending on the alternative being analyzed, the primary costs would be capital and expense forecast to continue to own and operate, decommissioning estimates, or cost to separate and transfer the asset to another entity.

Alternative Paths for Merced Falls: Overall Costs to Customers

Values are in $, 000s	Past Costs						Future Costs				Replacement Power Cost			Net Values	
Options	Net Book Value NBV (as of Dec 31, 2014)	Construction Work-in-progress CWIP (as of Dec 31, 2014)	Sales Proceeds	Unrecovered costs for recovery (as of Dec 31, 2014)	Cost of recovery assumptions	**Revenue requirement associated with past costs 2015$ (NPV) [1]**	Future O&M Expense 2015$ (NPV)	Revenue requirement associated with future Capital costs 2015$ (NPV)	Future Decommissioning Cost 2015$ (NPV)	**Revenue requirement associated with total future costs 2015$ (NPV)**	Cost of Replacement Energy 2015$ (NPV)	Cost of Replacement RECs [2] 2015$ (NPV)	**Sub-total of replacement power costs 2015$ (NPV)**	**TOTAL COST TO CUSTOMERS**	**TOTAL RETURN ON CAPITAL TO SHAREHOLDERS**
	(A)	(B)	(C)	(D) = (A)+(B)-(C)	(E)	**(F) = cost recovery of (D) based on depreciation schedule (E)**	(G)	(H) = cost recovery of future capital costs based on depreciation schedule (E)	(I)	**(J) = (G)+(H)+(I)**	(K)	(L)	**(N) = (K)+(L)+(M)**	**(O) = (F)+(J)+(N)**	**(P)**
1. Continue to Own and Operate the Asset	3,541	2,847	0	6,388	Annual Hydro composite depreciation rate of 2.03%	**9,391**	1,824	12,445	0	**14,269**	0	0	0	**23,661**	**7,137**
2. Sell the Asset	3,541	2,847	850	5,538 [3]	5 year accelerated depreciation, straight-line	**6,382**	0	0	0	**0**	4,949	1,127	**6,076**	**12,457**	**748**
3. Surrender the license and decommission the Asset [4]	3,541	2,847	0	6,388	5 year accelerated depreciation, straight-line	**7,361**	1,123	4,777	12,494 [5]	**18,393**	3,248	1,127	**4,374**	**30,128**	**1,325 [6]**

[1] PG&E recovers capital costs through a standard revenue requirement model which includes return on capital, book depreciation, income taxes, property taxes, O&M and insurance. We sum up these components for each year of the revenue requirements schedule and then calculate the Net Present Value (NPV) based on our authorized after-tax cost of capital of 7%. We don't include franchise fee and uncollectibles in this revenue requirement model.

[2] Assumes REC replacement costs from 2021 onwards

[3] Reflects netting sales proceeds of $850k which are received upon close of sale

[4] Assmues decommissioning starts at end of 2020

[5] Average of full and partial decommissioning estimates from 2008 study escalated to 2015 by historical annual consumer price index

[6] Return on capital does not include return on any decommissioning-related costs

NPV Analysis of Alternative Paths for Narrows

Values are in 2018$, 000s	Past Costs (based on 12/31/18 balances)						Future Costs (30-yr NPV)			Forgone Energy Values (30-yr NPV)				TOTAL COST TO CUSTOMERS
Options	NBV (Direct + Allocated)	CWIP (Direct + Allocated Relicensing)	Sales Proceeds (Price-trans. costs)	Unrecovered costs for recovery	Cost recovery assumptions	**RR of past costs (30 year NPV)**	Future O&M Expense	RR of future CAPX	**RR associated with total future costs**	Energy	RECs	Capacity	**Total**	
	(A)	(B)	(C)	(D) = (A)+(B)-(C)	(E)	**(F) = cost recovery of (D) based on (E)**	(G)	(H) = cost recovery of future CAPX based on (E)	**(I) = (G)+(H)**	(J)	(K)	(L)	**(M) = (J)+(K) + (L)**	**(N) = (F)+(I)+(M)**
1. Continue to Own and Operate the Asset	$ 4,097	$ 823	$ -	$ 4,920	Standard 50-Year Revenue Recovery	**$ 5,088**	$ 13,658	$ 32,554	**$ 46,212**	$ -	$ -	$ -	**$ -**	**$ 51,300**
2. Sell the Asset and Transfer License in 2019	$ 4,097	$ 823	$ 458	$ 4,463	Accelerated 1-Year Revenue Recovery	**$ 4,199**	$ 667	$ -	**$ 667**	$ 19,516	$ 5,657	$ 7,561	**$ 32,734**	**$ 37,600**
3. Surrender License and Decommission in 2034	$ 4,097	$ 823	$ -	$ 4,920	Accelerated 5-Year Revenue Recovery	**$ 5,932**	$ 17,463	$ 14,647	**$ 32,110**	$ 6,285	$ 1,650	$ 2,473	**$ 10,408**	**$ 48,450**

PG&E recovers capital costs through a standard revenue requirement model which includes return on capital, book depreciation, income taxes, property taxes, O&M and insurance. We sum up these components for each year of the revenue requirements schedule and then calculate the Net Present Value (NPV) based on our authorized after-tax cost of capital of 7%. We don't include franchise fee and uncollectibles in this revenue requirement model.

NPV Analysis of Alternative Paths

Values are in 2018$, 000s	Past Costs (based on 12/31/17 balances)						Future Costs (30-yr NPV)			Forgone Energy Values (30-yr NPV)				TOTAL COST TO CUSTOMERS
Options	NBV (Direct + Allocated)	CWIP (Direct + Allocated Relicensing)	Sales Proceeds (Price-trans. costs)	Unrecovered costs for recovery	Cost recovery assumptions	**RR of past costs (30 year NPV)**	Future O&M Expense	RR of future CAPX	**RR associated with total future costs**	Energy	RECs	Capacity	**Total**	
	(A)	(B)	(C)	(D) = (A)+(B)-(C)	(E)	**(F) = cost recovery of (D) based on (E)**	(G)	(H) = cost recovery of future CAPX based on (E)	**(I) = (G)+(H)**	(J)	(K1)	(K2)	**(L) = (J)+(K1)+(K2)**	**(M) = (F)+(I)+(L)**
1. Continue to Own and Operate the Asset	$ 30,719	$ 1,584	$ -	$ 32,303	Standard 50-Year Revenue Recovery	**$ 37,278**	$ 15,710	$ 14,620	**$ 30,330**	$ -	$ -	$ -	**$ -**	**$ 67,607**
2. Sell the Asset and Transfer in 2019	$ 30,719	$ 1,584	$ (50)	$ 32,353	Accelerated 1-Year Revenue Recovery	**$ 31,746**	$ 1,557	$ 45	**1,602**	$ 9,889	$ 2,863	$ 2,605	**15,357**	**$ 48,705**
3. Surrender License and Decommission in 2024	$ 30,719	$ 1,584	$ -	$ 32,303	1-Year Revenue Recovery in 2024	**$ 34,831**	$ 14,212	$ 3,438	**17,650**	$ 7,494	2,108	1,824	**11,426**	**$ 63,906**

PG&E recovers capital costs through a standard revenue requirement model which includes return on capital, book depreciation, income taxes, property taxes, O&M and insurance. We sum up these components for each year of the revenue requirements schedule and then calculate the Net Present Value (NPV) based on our authorized after-tax cost of capital of 7%. We don't include franchise fee and uncollectibles in this revenue requirement model.

NPV Analysis of Alternative Paths

Values are in 2020$, 000s	Past Costs (based on 12/31/19 balances)						Future Costs (30-yr NPV)			Forgone Energy Values (30-yr NPV)				
Options	NBV	CWIP	Sales Proceeds (Price-trans. costs)	Unrecovered costs for recovery	Cost recovery assumptions	**RR of past costs (30 year NPV)**	Future O&M Expense	RR of future CAPX	**RR associated with total future costs**	Energy	RECs	Capacity	**Total**	**TOTAL COST TO CUSTOMERS**
	(A)	(B)	(C)	(D) = (A)+(B)-(C)	(E)	**(F) = cost recovery of (D) based on (E)**	(G)	(H) = cost recovery of future CAPX based on (E)	**(I) = (G)+(H)**	(J)	(K)	(L)	**(M) = (J)+(K)+(L)**	**(N) = (F)+(I)+(M)**
1. Continue to Own and Operate the Asset	$ 19,962	$ -	$ -	$ 19,962	Standard 50-Year Revenue Recovery	**$ 24,113**	$ 8,227	$ 12,560	**$ 20,788**	$ -	$ -	$ -	**$ -**	**$ 44,901**
2. Sell the Asset and Transfer License in 2021	$ 19,962	$ -	$ 9,450	$ 10,512	Accelerated 1-Year Revenue Recovery	**$ 11,970**	$ 953	$ -	**$ 953**	$ 16,751	$ 5,818	$ 1,760	**$ 24,329**	**$ 37,252**

PG&E recovers capital costs through a standard revenue requirement model which includes return on capital, book depreciation, income taxes, property taxes, O&M and insurance. We sum up these components for each year of the revenue requirements schedule and then calculate the Net Present Value (NPV) based on our authorized after-tax cost of capital of 7%. We don't include franchise fee and uncollectibles in this revenue requirement model.

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NPV Analysis of Alternative Paths

Values are in 2019$, 000s	Past Costs (based on 12/30/19 balances)						Future Costs (30-yr NPV)			Forgone Energy Values (30-yr NPV)						
Options	NBV	CWIP	Sales Proceeds (Price-trans. costs)	Unrecovered costs for recovery	Cost recovery assumptions	**RR of past costs (30 year NPV)**	Future O&M Expense	RR of future CAPX	**RR associated with total future costs**	Energy	RECs	Capacity	**Total**	**TOTAL COST TO CUSTOMERS**	**TOTAL RETURN ON CAPITAL TO SHAREHOLDERS**	**GOING-FORWARD NPV**
	(A)	(B)	(C)	(D) = (A)+(B)-(C)	(E)	**(F) = cost recovery of (D) based on (E)**	(G)	(H) = cost recovery of future CAPX based on (E)	**(I) = (G)+(H)**	(J)	(K)	(L)	**(M) = (J)+(K)+(L)**	**(N) = (F)+(I)+(M)**	**(O)**	**(P)**
1. Continue to Own and Operate the Asset	$ 8,110	$ 1	$ -	$ 8,110	Standard 50-Year Revenue Recovery	**$ 9,797**	$ 11,445	$ 54,919	**$ 66,364**	$ 5,881	$ 2,451	$ 196	**$ 8,528**	**$ 84,689**	**$ 23,147**	**$ (30,318)**
2. Sell the Asset and Transfer License in 2020	$ 8,110	$ 1	$ 1,806	$ 6,304	Accelerated 1-Year Revenue Recovery	**$ 6,522**	$ 321	$ 86	**$ 406**	$ 31,612	$ 11,357	$ 1,085	**$ 44,053**	**$ 50,982**	**$ 585**	**$ (406)**
3. Surrender License and Decommission in 2028	$ 8,110	$ 1	$ -	$ 8,110	Accelerated 5-Year Revenue Recovery	**$ 9,649**	$ 12,636	$ 480	**$ 13,116**	$ 31,612	$ 11,357	$ 1,085	**$ 44,053**	**$ 66,818**	**$ 2,398**	**$ (13,116)**

PG&E recovers capital costs through a standard revenue requirement model which includes return on capital, book depreciation, income taxes, property taxes, O&M and insurance. We sum up these components for each year of the revenue requirements schedule and then calculate the Net Present Value (NPV) based on our authorized after-tax cost of capital of 7%. We don't include franchise fee and uncollectibles in this revenue requirement model.

NPV Analysis of Alternative Paths

Values are in 2022$, 000s	Past Costs (based on 1/31/22 balances)						Future Costs (30-yr NPV)			Forgone Energy Values (30-yr NPV)				
Options	NBV	CWIP	Sales Proceeds (Price-trans. costs)	Unrecovered costs for recovery	Cost recovery assumptions	**RR of past costs (30 year NPV)**	Future O&M Expense	RR of future CAPX	**RR associated with total future costs**	Energy	RECs	Capacity	**Total**	**TOTAL COST TO CUSTOMERS**
	(A)	(B)	(C)	(D) = (A)+(B)-(C)	(E)	**(F) = cost recovery of (D) based on (E)**	(G)	(H) = cost recovery of future CAPX based on (E)	**(I) = (G)+(H)**	(J)	(K)	(L)	**(M) = (J)+(K)+(L)**	**(N) = (F)+(I)+(M)**
1. Continue to Own and Operate the Asset	$ 2,746	$ -	$ -	$ 2,746	Standard 50-Year Revenue Recovery	**$ 4,067**	$ 10,389	$ 95,317	**$ 105,706**	$ 2,233	$ 841	$ 187	**$ 3,261**	**$ 113,034**
2. Sell the Asset and Transfer License in 2022	$ 2,746	$ -	$ (5,423)	$ 8,169	Accelerated 1-Year Revenue Recovery	**$ 7,454**	$ 234	$ 4,510	**$ 4,744**	$ 11,558	$ 5,054	$ 872	**$ 17,485**	**$ 29,683**
3. Surrender License and Decommission in 2030	$ 2,746	$ -	$ -	$ 2,746	Accelerated 5-Year Revenue Recovery	**$ 3,605**	$ 13,600	$ 6,628	**$ 20,228**	$ 11,558	$ 5,054	$ 872	**$ 17,485**	**$ 41,318**

PG&E recovers capital costs through a standard revenue requirement model which includes return on capital, book depreciation, income taxes, property taxes, O&M and insurance. We sum up these components for each year of the revenue requirements schedule and then calculate the Net Present Value (NPV) based on our authorized after-tax cost of capital of 7%. We don't include franchise fee and uncollectibles in this revenue requirement model.

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

PG&E Data Request No.:	CalCCA_020-Q006
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_020-Q006
Request Date:	April 24, 2026
Requester DR No.:	020
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	May 1, 2026
PG&E Witness(es):	Donna Barry – Energy Policy and Procurement

QUESTION 006

Refer to PG&E's response to CalCCA Data Request 18.12(a), where PG&E states "PG&E's request in this 2027 GRC application of the cost to maintain and operate its hydro portfolio in alignment with its FERC license terms and conditions may be the best quantification of these benefits":

a. Please provide PG&E's supporting evidence and/or reasoning for this claim.

b. Provide any documentation in PG&E's possession that supports PG&E's response to subpart (a). If there is none, please explain why.

ANSWER 006

a. PG&E has nothing to add to its original Data Request 18.12(a) response. The rationale / reasoning was provided in the original response, as is emphasized below:

> *For the remaining benefits, many are unquantifiable since the counterfactual negative outcome of doing nothing is not an option*. (e.g., fulfillment of water rights and downstream water deliveries, environmental habitat for fish and other species, recreation uses, public safety, and water for fire protection and wildfire response).
>
> PG&E's request in this 2027 GRC application of the cost to maintain and operate its hydro portfolio in alignment with its FERC license terms and conditions may be the best quantification of these benefits albeit, *certain environmental and safety externalities (e.g., clean water and protection of habitat for fish and other species, water for fire protection, and dam safety) are likely not fully quantified directly in PG&E's hydro revenue requirement request*. (Emphasis Added)

b. Please see testimony and workpapers supporting Chapter 2, Risk Mitigation and Chapter 3, Hydro Operations.

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Data Response

PG&E Data Request No.:	CalCCA_020-Q007
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_020-Q007
Request Date:	April 24, 2026
Requester DR No.:	020
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	May 1, 2026
PG&E Witness(es):	Rebecca Doidge – Generation

QUESTION 007

Refer to PG&E-17, page 7-22, lines 8-11, where PG&E states that "[w]hether a hydroelectric facility remains used and useful is not based solely on the operational status of the assets, since a facility can continue to serve regulatory and operational functions even when the asset is not generating electricity":

a. Please identify the "regulatory and operational functions" being served by the following assets:
   i. Kilarc and Cow Creek
   ii. Kerckhoff 1
   iii. Potter Valley
   iv. San Joaquin #1A, San Joaquin #2, and San Joaquin #3
   v. Centerville
   vi. Inskip
   vii. Hamilton Branch
b. For each of these nine assets, explain which component(s) of the asset are serving the "regulatory and operational functions" identified in subpart (a) of this question.
c. Explain how each asset's provision of the "regulatory and operational functions" identified in subpart (a) of this question benefit PG&E ratepayers.
d. Confirm or deny for each asset identified in subpart (a): as of the date of this discovery request, the facility is not currently capable of generating electricity if called upon by PG&E. If deny, please explain.
e. For each asset identified in subpart (a): has PG&E conducted a documented, asset-level analysis separating the rate base attributable to the non-generating asset components from the rate base attributable to other asset components? If yes, please provide PG&E's analysis for each asset.

f. For what duration of time since it last generated electricity does PG&E feel it is reasonable for each asset identified in part (a) to continue to serve "operational and regulatory functions"? Is it reasonable that those assets continue to serve "operational and regulatory functions" indefinitely if generation is not resumed?

ANSWER 007

Correction to the quote from Exhibit (PG&E-17), p. 7-22, which says, "Whether a hydroelectric facility remains used and useful is not based solely on the operational status of the *powerhouses*, since a facility can continue to serve…" For purposes of responding to this question, PG&E assumed, when CalCCA uses the term "asset" in subpart a, it is referring to the powerhouse only, and not the other hydroelectric assets that are associated with the powerhouse. However, in an attempt to provide a full response, PG&E includes additional reference to non-powerhouse assets for subparts a, b, c, e and f.

a. When PG&E refers to regulatory functions provided by the assets, PG&E must comply with all requirements in the FERC license and other regulatory authorizations from state or federal agencies (e.g., Department of Water Resources Division of Safety of Dams (DSOD), U.S. Forest Service, etc.) if and until implementation of decommissioning under a FERC license surrender or amendment order. These regulatory compliance requirements are largely related to public safety and environmental resource protection. For all of the listed powerhouses, the FERC licenses and other regulatory authorizations still apply. Hamilton Branch is not a FERC-licensed project but is under the jurisdiction of DSOD and California Department of Fish and Wildlife.

   When PG&E refers to operational functions provided powerhouse that is not generating electricity, it references the situation when components of the powerhouse are still used to convey water or to manage dam safety, meaning they provide an operational function for the larger hydroelectric development. Potter Valley is the only listed powerhouse that is still providing an operational function to bypass water.

   Non-powerhouse assets associated with these powerhouses (i.e., water storage and conveyance facilities) may still be operational. PG&E did not conduct a component-by-component evaluation of those non-powerhouse assets for this data request.

b. All components of the powerhouses and non-powerhouse assets still have regulatory requirements from FERC, DSOD, CDFW, etc.

c. PG&E obtained the FERC licenses and other regulatory authorizations in order to build and operate these assets for the benefit of its customers. Customers benefited from the operation of the asset over many decades, and customers continue to benefit from the continued implementation of the FERC compliance requirements to protect public safety and environmental resources.

d. Confirmed that all powerhouses are currently non-operational, and that at least some physical work would need to be done at each powerhouse in order for it to return to service. From a regulatory standpoint, only Kilarc and Cow Creek are unable to return to service.

e. With the exception of Kilarc-Cow Creek, PG&E has not performed a component level review of these powerhouses separate from the other non-powerhouse assets that are part of the overall hydro project. For Kilarc-Cow Creek project and for the Miocene system (Lime Saddle and Coal Canyon powerhouses), PG&E looked at the water conveyance and storage assets separately from the powerhouse assets. See response to CalCCA019 Question 10 for the Kilarc-Cow Creek breakdown.

f. PG&E cannot apply an exact duration of time to all powerhouses for how long it should take to make a determination on whether to repower or repair a powerhouse and then to proceed through the regulatory process to permanently retire the asset. Even when PG&E has taken action to divest a non-operational asset, either through surrender of the FERC license or through a negotiated asset sale, FERC regulatory processes and sale transactions have taken years to complete.

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

PG&E Data Request No.:	CalCCA_020-Q008
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_020-Q008
Request Date:	April 24, 2026
Requester DR No.:	020
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	May 1, 2026
PG&E Witness(es):	Rebecca Doidge – Generation

QUESTION 008

Refer to PG&E-17, page 7-23 through 7-24, where PG&E states that until CAISO approves retirement of the nine assets identified in Question 20.07(a) above, PG&E "has obligations related to those facilities":

a. Please identify specifically what obligations PG&E is referencing here with respect to each asset.

b. Does fulfillment of those obligations result in ratepayer benefits? If so, please list those benefits and explain how, in PG&E's view, those benefits justify continued rate base inclusion.

ANSWER 008

a. See response to CalCCA_020-Q007.

b. PG&E's hydro assets have been operating and serving PG&E's customers for many decades. PG&E obtains operating licenses from FERC with terms of 40 to 50 years to govern these hydro facilities. The FERC (or other) requirements are an inherent part of owning and operating the facilities. Just because these aging assets are not generating electricity, doesn't mean the regulatory requirements go away immediately. Ratepayers have benefited from these assets for decades, and now that we are in the last phase of the asset's life cycle, those who have benefited from the asset should pay for its ultimate end of life.

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

PG&E Data Request No.:	CalCCA_020-Q009
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_020-Q009
Request Date:	April 24, 2026
Requester DR No.:	020
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	May 1, 2026
PG&E Witness(es):	Rebecca Doidge – Generation

QUESTION 009

Refer to PG&E-17 pages 7-23 through 7-24, where PG&E states that the nine assets identified by CalCCA will be retired and removed from the revenue requirement "[w]hen and if they have met the three criteria: facilities are non-operational, receipt of FERC approval, and receipt of CAISO approval":

a. Is it PG&E's position that a non-generating hydroelectric asset remains "used and useful" until PG&E receives approval from CAISO and FERC to retire that asset?

b. In the context of PG&E's three criteria, define what PG&E means by "non-operational."

   i. Does PG&E have any criteria for determining whether a facility is "non-operational"?

   ii. Does PG&E apply the non-operational designation for purposes of accounting records at the facility or facility component level?

c. Please identify any CPUC decision(s) that establishes FERC and/or CAISO authorization as a prerequisite to removal of a non-generating asset from rate base.

d. Please identify any CPUC decision(s) that establishes FERC and/or CAISO authorization as relevant to removal of a nongenerating asset from rate base.

e. If PG&E determines that (1) a hydro asset is "non-operational" and (2) PG&E does not intend to return the hydro asset to service in the future:

   i. Does PG&E have an established process and/or timeline for determining when and whether to seek CAISO and FERC approval to retire the asset? If yes, please provide PG&E's process or timeline for making these decisions.

   ii. Are there any circumstances under which PG&E would determine not to seek CAISO/FERC approval to retire an asset that is non-operational and which PG&E does not intend to return to service? If yes, explain.

ANSWER 009

a. Yes, and it's important to note that, for assets under a FERC license, PG&E still has regulatory obligations until PG&E implements the FERC order and FERC terminates the license.

b. i. There is no formal definition for a non-powerhouse asset to be "non-operational", but if an asset is not providing the service that it was intended to serve, then it would be considered in outage. For example, if a canal does not have water flowing through it, the canal would be non-operational; if a dam was not impounding water, then the dam would be non-operational.

   ii. PG&E has begun applying the non-operational designation at the component level. This application is new over the past several months, as hydro assets have begun to meet retirement milestones, e.g., receipt of the FERC order to decommission Kilarc-Cow Creek.

c. And d. PG&E is not aware of a CPUC decision on how FERC and CAISO authorizations influence the removal of an asset from rate base.

e. i. PG&E does not have a set timeline for seeking FERC or CAISO approval to retire an asset.

   ii. Only in the case of a sale, where it is important to maintain a viable asset for a future owner, PG&E might not file to retire or decommission the asset so that it can proceed with the sale.

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Data Response

PG&E Data Request No.:	CalCCA_020-Q010
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Request Date:	April 24, 2026
Requester DR No.:	020
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	May 1, 2026
PG&E Witness(es):	Rebecca Doidge – Generation

QUESTION 010

Refer to PG&E's Response to CalCCA Data Request 19-005b: When does PG&E anticipate making a decision on whether to repower, sell, or retire the San Joaquin #1A, San Juaquin #2, and San Joaquin #3 powerhouses?

ANSWER 010

PG&E does not have a definite timeline for making a decision on San Joaquin 1a.

PG&E plans to make a decision regarding San Joaquin 2 after the dam analysis is complete, which is estimated to be in 2028, pending annual budget priorities.

PG&E plans to return San Joaquin 3 back to service by the end of the 2026 following repair of the damaged canal.

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Data Response

PG&E Data Request No.:	CalCCA_020-Q011
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_020-Q011
Request Date:	April 24, 2026
Requester DR No.:	020
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	May 1, 2026
PG&E Witness(es):	Donna Barry – Energy Policy and Procurement

QUESTION 011

Refer to PG&E's Response to CalCCA Data Request 19-15a: Could the Commission order re-vintaging of the eight hydro assets CalCCA recommends for re-vintaging *contingent upon their FERC license being renewed*? Does the Commission have that authority, and would that address PG&E's concern?

ANSWER 011

PG&E objects to this data request to the extent it calls for a legal conclusion. Subject to that objection, PG&E responds as follows:

PG&E will not speculate on what the Commission will do with respect to CalCCA's recommendation(s). No, this would not address PG&E's concern. Re-vintaging the asset based on the FERC relicense status – existing, pending, or new – is not a valid reason to re-vintage UOG resources.

The Commission made a similar determination in the 2023 GRC final decision, D.23-11-069, where it declined to approve the Joint CCAs recommendation to re-vintage resources based on updated depreciation studies that assumed a FERC relicense application was approved with an extended license term. D.23-11-069 noted that in the 2017 Power Charge Indifference Adjustment (PCIA) Rulemaking, R.17-06-026, D.18-10-019 opened the door to considering re-vintaging in two specific cases:

1. A significant overhaul, or
2. plant investments for certain upgrades.

In D.23-11-069, the Commission found no linkage between the FERC re-licensing application's term and a significant overhaul or capacity upgrades to the facilities.

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Data Response

PG&E Data Request No.:	CalCCA_020-Q012
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_020-Q012
Request Date:	April 24, 2026
Requester DR No.:	020
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	May 1, 2026
PG&E Witness(es):	Donna Barry – Energy Policy and Procurement

QUESTION 012

Refer to PG&E's Response to CalCCA Data Request 19-16: Given that PG&E stated in its response to CalCCA 19-16b that the determination of the method for allocating accumulate depreciation from FERC accounts to the hydro facility would have an impact on PCIA rates, please explain why PG&E believes, as stated in the response to CalCCA 19-16c, that it is not a competitive issue.

ANSWER 012

PG&E supports customer choice and is not competing with CCA's to serve customers.

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

PG&E Data Request No.:	CalCCA_020-Q013
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_020-Q013
Request Date:	April 24, 2026
Requester DR No.:	020
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	May 1, 2026
PG&E Witness(es):	Eric Van Deuren – Generation

QUESTION 013

Refer to PG&E's Response to CalCCA Data Request 19-17:

a. How many times in calendar year 2025 did a hydro operator call out sick or was otherwise unable to complete his or her shift?

b. Take the situation of a hydro operator calling out sick for the 8 AM-8 PM shift. Would having the second operator operate that 8 AM-8 PM shift alone in a two operator model result in PG&E incurring less overtime expense than asking the single operator in the previous 8 PM-8 AM shift to stay late until 2 PM coupled with asking the single operator in the subsequent 8 PM-8 AM shift to come in early at 2 PM, in a single operator model?

ANSWER 013

a. Hydro operators called out sick 413 times in 2025. The total number of hours charged to sick time associated with these 413 times is 4,152 hours.

b. Yes, PG&E agrees in this situation that having the second operator fill the 8 AM to 8 PM shift alone would avoid the overtime expense that would be incurred in the single operator model where the single operator from the previous shift would cover 8 AM to 2 PM and the single operator from the next shift would cover 2 PM to 8 PM. However, this only addresses the fatigue challenge associated with extending the operator's shifts and does not address the lone worker challenge. Below, PG&E again provides its response as to why PG&E is moving to a two-operator model.

   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, but once the operator positions are fully staffed and qualified, this is expected to happen infrequently.

As a reminder, PG&E is moving to a two-operator model to address 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.

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Data Response

PG&E Data Request No.:	CalCCA_020-Q014
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Request Date:	April 24, 2026
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Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	May 1, 2026
PG&E Witness(es):	Eric Van Deuren – Generation

QUESTION 014

Refer to PG&E's Response to CalCCA Data Request 19-19: As of the date of this discovery request, does PG&E have any open job postings on its website for a hydro facility operator? If so, please provide a copy of that posting. If not, please explain why not.

ANSWER 014

No, PG&E does not have any open job postings on its website for a hydro operator as of April 28, 2026. However, PG&E has a current Hydro Operator-in-Training (HOIT) program cohort in progress with 15 employees. PG&E plans to open job postings for the remaining needed operators in Fall of 2026 for Provisional Operators as well as entry-level operators to enter the next HOIT cohort by early 2027.

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

PG&E Data Request No.:	CalCCA_020-Q015
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Request Date:	April 24, 2026
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Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	May 1, 2026
PG&E Witness(es):	Rebecca Doidge – Generation

QUESTION 015

Refer to PG&E's Response to CalCCA Data Request 19-5b:

a. Regarding Kerckhoff 1 and Potter Valley, please explain the nature of the FERC proceedings referenced in PG&E's response. Is PG&E aware of any legal requirement that prevents PG&E from submitting to CAISO a permanent retirement application while there is an active FERC proceeding involving that facility?

b. Regarding Hamilton Branch, please indicate the approximate date when active sale negotiations began for this facility.

c. Regarding Inskip, is PG&E aware of any legal requirement that prevents PG&E from submitting to CAISO a permanent retirement application while awaiting FERC authorization to decommission the facility?

d. Regarding Hamilton Branch, should PG&E be successful in its sale of this hydro facility, when will PG&E remove this facility from the rate base—upon close of the sale, or after FERC approval of a license transfer?

ANSWER 015

a. Kerckhoff 1 is a relicensing proceeding with FERC. Potter Valley is a license surrender proceeding. PG&E is not aware of a legal requirement – as stated in PG&E's response to CalCCA_019 Question 5a, as this is PG&E's interpretation of accounting rules.

b. PG&E issued a request for offers and identified a potential buyer for Hamilton Branch in 2021; active negotiations began in December of that year.

c. See response to subpart a.

d. Hamilton Branch is not a FERC-licensed project. The ratemaking associated with the sale will be implemented as directed in the Section 851 application currently pending with the CPUC.

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

PG&E Data Request No.:	CalCCA_020-Q016
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Request Date:	April 24, 2026
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Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	May 1, 2026
PG&E Witness(es):	Rebecca Doidge – Generation

QUESTION 016

Refer to PG&E's Response to CalCCA Data Request 19-9a-b: PG&E indicates that it originally attempted to sell the DeSabla-Centerville project in 2017, but the sale was unsuccessful. Please provide the approximate date on which PG&E's efforts to sell this facility ended, prior to PG&E's 2025 Request for Offers.

ANSWER 016

The DeSabla-Centerville purchase and sale agreement was terminated by mutual agreement in summer 2022.

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2027 General Rate Case Phase I
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Data Response

PG&E Data Request No.:	CalCCA_020-Q017
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Request Date:	April 24, 2026
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Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	May 1, 2026
PG&E Witness(es):	Rebecca Doidge – Generation

QUESTION 017

Refer to PG&E's Response to CalCCA Data Request 19-10, where PG&E states in response to the question if it is PG&E's position that the water conveyance and storage facilities for Kilarc-Cow Creek will not be adjusted out in the next RO model run:

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

Refer also 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":

Can PG&E reconcile these two positions? In other words, is it PG&E's position that one of the requirements for removing a hydro asset from rate base is that PG&E <u>have receipt of FERC approval of license surrender, or that PG&E has physically removed the asset after a FERC approval of license surrender?</u>

ANSWER 017

For non-operational assets, retirement can occur after receipt of the FERC and CAISO approvals. For assets that are still operating during the phased decommissioning of the larger hydroelectric project (e.g., the water conveyance assets at Kilarc-Cow Creek), retirement should occur once physical decommissioning begins, or when those assets become non-operational.