

Docket No.: A.25-05-009

Exhibit No.: CALCCA Ex-3

Date: May 5, 2026

Sponsor/Witness: PG&E (Various)

CALCCA EX-3
PG&E Responses to CalCCA DR Set 17

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

PG&E Data Request No.:	CalCCA_017-Q001
PG&E File Name:	GRC-2027-Phi_DR_CalCCA_017-Q001
Request Date:	March 20, 2026
Requester DR No.:	017
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 6, 2026
PG&E Witness(es):	Eric Van Deuren – Generation

QUESTION 001

Refer to the Attachment PGE 2027 GRC_2025 Recorded Expenditures.xlsx provided March 13, 2026. Please provide an explanation for the variance in capital expenditures between 2025 forecast and actuals for the following MWCs:

- Actual 2025 expenses of 83.805 million in MWC 2L as compared to forecasted 2025 expenses of 70.247 million as shown in Table 3-5 on p. 3-9 of Ex. PG&E-5.
- Actual 2025 expenses of 191.756 million in MWC 2M as compared to forecasted 2025 expenses of 127.175 million as shown in Table 3-5 on p. 3-9 of Ex. PG&E-5.
- Actual 2025 expenses of 28.738 million in MWC 2P as compared to forecasted 2025 expenses of 19.363 million as shown in Table 3-5 on p. 3-9 of Ex. PG&E-5.

ANSWER 001

MWC 2L

Actual spend exceeded forecast primarily due to 5742783 Pit 3 PH Seismic Retrofit project, where actual spend was \$22.504 million compared with \$9.216 million forecast.

MWC 2M

Actual spend exceeded forecast primarily due to a combination of projects exceeding forecast, and emergent projects without forecasts in 2025. Below is a list of projects representing a majority of the overall variance within MWC 2M (\$ Thousands):

PLANNING ORDER	PLANNING ORDER DESCRIPTION	FORECAST	ACTUAL	VARIANCE
5720659	Caribou 2-5 Rewind	2,502	12,021	9,519
5779423	Belden PH Refurbish TSV	3,643	8,831	5,188
5792369	West Point Rewind Generator	2,826	7,697	4,871
5798387	Kings River – Replace TSV	5,369	9,336	3,967
5747177	Bucks Cr PH Repl U2 Turb Brg / Shaft	0	3,199	3,199
5768011	Poe Unit 1 Excitation System Replacement	0	4,209	4,209
5793621	Stan PH Repl Thrust Bearing Cooling Coil	0	3,850	3,850
5811208	Spa 2 Mechanical and Electrical Upgrade	0	3,041	3,041
5817503	SCADA 2026 RTU Life Cycle Replacement	0	3,257	3,257

Total	14,340	55,441	41,101
--------------	---------------	---------------	---------------

MWC 2P

Actual spend exceeded forecast primarily due to a combination of projects exceeding forecast, and emergent projects without forecasts in 2025. Below is a list of projects representing a majority of the overall variance within MWC 2P (\$ Thousands):

PLANNING ORDER	PLANNING ORDER DESCRIPTION	FORECAST	ACTUAL	VARIANCE
5797658	Pit 5 Surge Chmbr & VH Sld Stabilization	4,126	9,042	4,916
5786900	Helms - Rplc Suprt Fac Back Up Generator	0	2,846	2,846
5792759	Caribou Rd PNF Rd 27N26 Mitigate Erosion	0	1,370	1,370
	Total	4,126	13,257	9,131

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

PG&E Data Request No.:	CalCCA_017-Q002
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_017-Q002
Request Date:	March 20, 2026
Requester DR No.:	017
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 6, 2026
PG&E Witness(es):	Eric Van Deuren – Generation

QUESTION 002

Refer to the Attachment PGE 2027 GRC_2025 Recorded Expenditures.xlsx provided March 13, 2026. Please provide an explanation for the variance in OM expense between 2025 forecast and actuals for the following MWCs:

- Actual 2025 expenses of 41.976 million in MWC AX as compared to forecasted 2025 expenses of 31.109 million as shown in Table 3-4 on p. 3-8 of Ex. PG&E-5.
- Actual 2025 expenses of 35.405 million in MWC IG as compared to forecasted 2025 expenses of 31.111 million as shown in Table 3-4 on p. 3-8 of Ex. PG&E-5.
- Actual 2025 expenses of 44.022 million in MWC KG as compared to forecasted 2025 expenses of 42.522 million as shown in Table 3-4 on p. 3-8 of Ex. PG&E-5.
- Actual 2025 expenses of 27.593 million in MWC KH as compared to forecasted 2025 expenses of 25.019 million as shown in Table 3-4 on p. 3-8 of Ex. PG&E-5.
- Actual 2025 expenses of 17.378 million in MWC KI as compared to forecasted 2025 expenses of 12.364 million as shown in Table 3-4 on p. 3-8 of Ex. PG&E-5.

ANSWER 002

MWC AX

Actual spend exceeded forecast primarily due to emergent projects without forecasts in 2025. Below is a list of project representing the majority of the overall variance within MWC AX (\$ Thousands):

PLANNING ORDER	PLANNING ORDER DESCRIPTION	FORECAST	ACTUAL	VARIANCE
5280074	AE: Hydro Veg Program	0	619	619
5286335	PV Repair Upr & Lwr Wood Stave Pnstk	0	349	349
5287002	Dam Safety Camera (HAWC Cameras) - Maint	0	182	182
5288242	AM: Canal Blitz - ARR - VPF	0	5,287	5,287
5288246	Butte Canal Restoration Exp - VPF	0	659	659
5288251	Penstock Inspection Program - ARR - VPF	0	322	322
5288253	Water Conveyance Inspections ARR - VPF	0	320	320

5288256	ARR Level of Effort - VPF	0	7,703	7,703
5288654	AM:PH Civil AF Prog Dvlp Cond Assmt VPF	0	187	187
5288655	DSP: Specialized Inspections: Concr VPF	0	105	105
5288753	Low Level Outlets Inspections - VPF	0	612	612
5288858	Asset Knowledge Management - ARR VPF	0	443	443

MWC IG

Actual spend exceeded forecast primarily due to: (1) 5279332 Potter Valley License Surrender, where actual spend was \$3.108 million compared to \$1.311 million forecast, and (2) the emergent project 5289552 FERC Cybersecurity Assessment, where actual spend was \$1.569 million.

MWC KG

Actual spend exceeded forecast primarily due to the emergent project 5288752 PGEN Training Crafting Proficiency VPF, where actual spend was \$1.671 million.

MWC KH

Actual spend exceeded forecast primarily due to (1) 5000557 Shasta Maint Generators, where actual spend was \$4.839 million compared to \$3.513 million forecast, and (2) 5000559 Drum Maint Generators, where actual spend was \$2.075 million compared to \$0.750 million forecast.

MWC KI

Actual spend exceeded forecast primarily due to the emergent project 5290896 PG Garnet Fire – VPF – MAT KI3, where actual spend was \$4.301 million.

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

PG&E Data Request No.:	CalCCA_017-Q003
PG&E File Name:	GRC-2027-PhI_DR_CalCCA_017-Q003
Request Date:	March 20, 2026
Requester DR No.:	017
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 6, 2026
PG&E Witness(es):	Various

QUESTION 003

Refer to the Attachment PGE 2027 GRC_2025 Recorded Expenditures.xlsx provided March 13, 2026.

- a. Please provide an explanation for the variance in OM expense between 2025 forecast and actuals for the following organizational costs:
- Actual 2025 expenses of 74.342 million in Finance Org Costs as compared to forecasted 2025 expenses of 80.863 million as shown in Table 2-1 on p. 2-3 of Ex. PG&E-9.
 - Actual 2025 expenses of 12.115 million in Ethics & Compliance Costs as compared to forecasted 2025 expenses of 16.790 million as shown in Table 5-1 on p. 5-5 of Ex. PG&E-9.
 - Actual 2025 expenses of 16.552 million in Corporate Secretary & PG&E Corporation and PG&E Utility Executive Offices (CEO's) Costs as compared to forecasted 2025 expenses of 9.417 million as shown in Table 7-1 on p. 7-3 of Ex. PG&E-9.
- b. Did PG&E implement any program or programs of involuntary layoffs in calendar year 2025? If so, please specify the organization, number of positions, and title of positions eliminated. Does PG&E plan to backfill those positions?

ANSWER 003

- a. Please see below for PG&E's variance explanation for the difference between its 2025 forecast and 2025 recorded for its Finance Organization, Ethics & Compliance Organization, and Corporate Secretary & Executive Offices Organization as presented in Exhibit (PG&E-9).
- **Finance Org (Witness: Amanda Klinger):** \$6.521 million overall decrease between 2025 forecast and 2025 actuals for the Finance organization. The three primary drivers for the underrun are as follows:

- \$3.665 million: The variance reflects approximately \$4 million in credits resulting from an audit review that is performed every two to three years. Prior audits have historically resulted in significantly less findings.
 - \$1.779 million: Delayed hiring and less emergent work materialized in 2025 than anticipated in forecast. While emergent work in 2025 was lower than forecast, future finance strategies and approaches may evolve which would result in increased emergent work.
 - \$1.077 million: These costs will be removed, reflected in PG&E's Rebuttal Exhibit (PG&E-21), Chapter 2 and will be addressed through PG&E's Errata to be submitted on April 10, 2026.
 - **Ethics & Compliance Org (Witness: Jen Andrews & Tim Lucey):** \$4.675 million overall decrease between 2025 forecast and 2025 actuals for Ethics & Compliance organization is primarily attributable to 1) reduced spend due to fewer conduct investigations requiring support from outside counsel and, 2) lower than anticipated privacy and compliance contract spend. Compared to prior years, 2025 appears to be/was an anomalous year and we expect the forecast for 2027 to remain as we supported in our testimony.
 - **Corporate Sec/Executive Offices Org (Witness: Bill Manheim):** \$7.135 million overall increase between 2025 forecast and 2025 actual is primarily driven by the following factors.
 - CEO Office: The \$5.662 million variance above the forecast is primarily driven by emergent strategic consulting costs (\$6 million) that sat in the CEO Office in 2025.
 - Corporate Secretary: The \$0.642 million variance above the forecast is primarily driven by higher than anticipated contract spend to support the annual shareholders meeting, largely driven by expanded scope and support requirements.
 - PMO Special Projects: The \$0.831 million variance above the forecast is primarily driven by higher than forecasted labor costs, increased Leadership Town Hall venue expenses due to capacity constraints, and slight over run in travel related miscellaneous expenses.
- b. No, PG&E did not implement any program or coordinated effort to reduce its workforce in 2025. The involuntary severances that took place in 2025 were part of the normal course of business.

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

PG&E Data Request No.:	CalCCA_017-Q004
PG&E File Name:	GRC-2027-Phi_DR_CalCCA_017-Q004
Request Date:	March 20, 2026
Requester DR No.:	017
Requesting Party:	California Community Choice Association
Requester:	Julia Kantor
Date Sent:	April 6, 2026
PG&E Witness(es):	Various – People

QUESTION 004

Refer to the Attachment PGE 2027 GRC_2025 Recorded Expenditures.xlsx provided March 13, 2026. Please provide an explanation for the variance in OM expense between 2025 forecast and actuals for the following organizational costs:

- a. Actual 2025 expenses of 404.800 million in STIP Utility Non-Officer Costs as compared to forecasted 2025 expenses of 260.002 million as shown in Table 3-3 on p. 3-16 of Ex. PG&E-8.
- b. Actual 2025 expenses of 687.636 million in Medical Costs as compared to forecasted 2025 expenses of 571.524 million as shown in Table 4-4 on p. 4-11 of Ex. PG&E-8.
- c. Actual 2025 expenses of 32.206 million in Mental Health Costs as compared to forecasted 2025 expenses of 25.828 million as shown in Table 4-4 on p. 4-11 of Ex. PG&E-8.
- d. Actual 2025 expenses of 194.877 million in Retirement Savings Plan Costs as compared to forecasted 2025 expenses of 186.525 million as shown in Table 4-12 on p. 4-57 of Ex. PG&E-8.

ANSWER 004

- a. Referring to 2025 STIP Utility Non-Officer costs.

The \$404.8 million for STIP Utility Non-Officers in 2025 referenced from the PGE 2027 GRC_2025 Recorded Expenditures was based on the final total accrual amounts for 2025 STIP.

Forecasted STIP expenses are formulated using annualized base salaries for the anticipated eligible employees, multiplied by their STIP participation rates (based on job level), an assumed Company Score of 1.0 (e.g., metric performance at target), and an assumed Individual Performance Modifier (IPM) of 1.0 for all participants. Actual STIP payments are based on the participants' eligible earnings, participation rates, final Company Score, and each participant's IPM, based on year-end performance.

The accruals for the STIP plan year are initially based on the STIP budget for the year, divided into monthly amounts. These accruals are adjusted, as needed, for factors which are anticipated to affect the actual STIP payout for the year. For example, the eligible earnings for STIP-eligible employees who separate from PG&E during the plan year are sometimes greater due to the inclusion of additional amounts due at time of separation, such as accrued vacation payouts.

In the last quarter of the year, typically in December, the accrual amount goes through a “true up” to adjust for additional factors impacting calculations, such as any change in STIP score (either above or below the 1.0 target score) based on the actual individual metric performance. For 2025 STIP, this meant a change from the assumed 1.0 Company Score to the actual 1.39 Company Score. The \$404.8 million was the final total accrual for the 2025 STIP plan year, after all adjustments were made.

b. Referring to 2025 Medical costs.

The variance between PG&E’s 2025 Affordability Medical forecast and 2025 actuals is approximately \$116 million¹. While the variance between PG&E’s 2025 Alternative Medical forecast and 2025 actuals forecast is approximately \$41 million².

The variance is mainly attributed to higher-than-expected claims costs as well as prescription drug rebates that came in lower than anticipated.

c. Referring to 2025 Mental Health costs.

The approximate \$6.4 million³ variance between 2025 actual and forecast is primarily driven by higher-than-expected claims costs, participant growth, and increase in out-of-network services.

d. Referring to 2025 Retirement Savings Plan.

The approximate \$8.3 million⁴ variance between 2025 actual and forecast is primarily driven by higher-than-forecasted headcount and salary escalation, which increased employer contributions under the Retirement Savings Plan.

¹ Exhibit (PG&E-8), p. 4-11, Table 4-4, line 1, Errata 1, filed 11/10/2025

² Exhibit (PG&E-8), p. 4-11, Table 4-5, line 1, Errata 1, filed 11/10/2025

³ Exhibit (PG&E-8), p. 4-11, Table 4-4, line 6, Errata 1, filed 11/10/2025

⁴ Exhibit (PG&E-8), p. 4-57, Table 4-12, line 1, Errata 1, filed 11/10/2025