

PG&E HEARING ROOM EXHIBIT PG&E Ex-29

A.25-05-009

In Lieu of Cross

Cal Advocates Response to DR PGE_CalAdvocates 45

(Witness: Dao Phan)



*Public Advocates Office
California Public Utilities Commission*

505 Van Ness Avenue
San Francisco, CA 94102

<http://publicadvocates.cpuc.ca.gov>

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

Date: 03/16/2026

Origination Date: 02/27/2026

Response Due: 03/18/2026

To: Hannah Keller
cc: GRC@pge.com

GRC 2027 Coordinators:
GRCCaseCoordinators@pge.com

From: Dao Phan, Project Coordinator
Public Advocates Office
505 Van Ness Avenue, Room 4104
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Data Request No: GRC-2023-Phi_DR_PGE_CalAdvocates045

GENERAL OBJECTIONS

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

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

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

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



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

PG&E Question 1:

CA-27 pp. 15-16 states: "Therefore, Cal Advocates recommends the Commission adopt a uniform approach across all cost categories to derive the attrition year adjustments. Cal Advocates recommends post test-year increases be based solely on the Consumer Price Index for 2028, 2029, and 2030." Please answer the following questions:

- a. Has Cal Advocates prepared any workpapers supporting its CA-27 Post-Test Year Ratemaking recommendation? If yes, have those workpapers been provided to PG&E?
- b. Do Tables 27-9 and 27-13 showing Cal Advocates 2027 Revenue Forecast adjusted by 2.4% (2028), 2.2% (2029), and 2.3% (2030) represent the entirety of Cal Advocates recommendation for revenues for 2028 to 2030?
- c. CA-27 p. 18 states: "Cal Advocates does not take issue with PG&E's Discrete Expense Programs proposal." Please confirm or deny: These proposals, not disputed by Cal Advocates, including a PTYR Expense Reduction of \$200 million per year for 2028 to 2030, will not change revenues under Cal Advocates "uniform approach" for attrition years 2028 to 2030.
- d. CA-27 Table 27-14 quantifies Cal Advocates disagreement with PG&E's Discrete Capital Programs for 2028 to 2030. Please confirm or deny: Cal Advocates recommendations, whether adopted or denied, will not change revenues under Cal Advocates "uniform approach" for attrition years because the uniform approach does not calculate a capital revenue requirement for capital additions made during 2028 to 2030.

Public Advocates Office Response to Question 1:

- a. No, Cal Advocates does not have any workpapers for CA-27.
- b. Yes, Tables 27-9 and 27-13 show Cal Advocates' recommendation for PTYR revenues for each year from 2028 through 2030.
- c. Cal Advocates confirms these proposals will not change revenues under Cal Advocates "uniform approach" for attrition years 2028 to 2030.
- d. Cal Advocates recommends a "uniform approach" for attrition years 2028 to 2030. If Cal Advocates' approach is denied, Cal Advocates recommends a capital revenue requirement for 2028-2030 based on its capital expenditure recommendations for each year.

Response prepared by Dao Phan.