

CPUC Docket: A.25-05-009

Exhibit: SBUA Ex.-11

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric
Company for Authority, Among Other Things,
to Increase Rates and Charges for Electric and
Gas Service Effective on January 1, 2027. (U
39 M)

Application 25-05-009
(Filed May 15, 2025)

**SMALL BUSINESS UTILITY ADVOCATES AND
PACIFIC GAS AND ELECTRIC COMPANY'S STIPULATED
DATA RESPONSES IN LIEU OF
CROSS-EXAMINATION OF WITNESS RASHEED**

PUBLIC VERSION

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May 14, 2026



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

PG&E Data Request No.:	SBUA_005-Q001
PG&E File Name:	GRC-2027-PhI_DR_SBUA_005-Q001
Request Date:	May 1, 2026
Requester DR No.:	005
Requesting Party:	Small Business Utility Advocates
Requester:	Ariel Strauss/Jennifer Weberski
Date Sent:	May 13, 2026
PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 001

Has PG&E identified whether any unionization or union contract negotiation is currently underway between vegetation management vendors and vendor employees? Please identify any discussion of this issue in PG&E’s testimony or workpapers.

ANSWER 001

PG&E is not involved in and does not typically track unionization activities or labor contract negotiations between vegetation management vendors and their employees. These activities are handled by vendors as independent businesses. As a result, PG&E has not identified whether any such negotiations are underway, and there is no discussion of this issue in PG&E’s testimony or workpapers.

PG&E’s forecasts for the 2027 GRC are based on historical average costs per unit and expected work volume. To the extent vendor labor-related changes affect costs (for example, wage increases), those impacts are reflected in the rates vendors charge PG&E and therefore show up in historical costs used as the basis for average cost per unit. PG&E does not separately track or analyze those underlying drivers in testimony or workpapers, and this is consistent with how PG&E has approached forecasting in prior General Rate Cases.

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Data Response**

PG&E Data Request No.:	SBUA_005-Q002
PG&E File Name:	GRC-2027-Phi_DR_SBUA_005-Q002
Request Date:	May 1, 2026
Requester DR No.:	005
Requesting Party:	Small Business Utility Advocates
Requester:	Ariel Strauss/Jennifer Weberski
Date Sent:	May 13, 2026
PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 002

When did vegetation management vendors last renegotiate contracts with their unionized employees?

ANSWER 002

PG&E does not track or manage labor contract negotiations between vegetation management vendors and their unionized employees. However, based on publicly available Letters of Agreement from IBEW 1245's website, vegetation management Line Clearance Tree Trimmers negotiated their contracts in June 2022, and the vegetation management inspection contract was negotiated in October 2021. PG&E does not independently verify or maintain records of vendor labor contract negotiation dates, and this information is not discussed in PG&E's testimony or workpapers.

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PG&E Data Request No.:	SBUA_005-Q003
PG&E File Name:	GRC-2027-Phi_DR_SBUA_005-Q003
Request Date:	May 1, 2026
Requester DR No.:	005
Requesting Party:	Small Business Utility Advocates
Requester:	Ariel Strauss/Jennifer Weberski
Date Sent:	May 13, 2026
PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 003

In the event that vegetation management vendors' employees join a union or the vendor renegotiates an existing union contracts, can the vendor increase contract prices charged to PG&E under existing contracts? If yes, please explain.

ANSWER 003

PG&E is not directly involved in labor decisions made by vegetation management vendors. Pricing under existing vegetation management contracts is governed by the terms of those contracts and does not automatically change as a result of vendor employee unionization or labor contract renegotiations.

If a vendor requests a change to contracted pricing, PG&E reviews the request based on the contract terms and the rationale provided and evaluates it through its internal review process before responding or engaging in any negotiation. PG&E does not provide automatic pricing adjustments tied to vendor labor actions.

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PG&E Data Request No.:	SBUA_005-Q004
PG&E File Name:	GRC-2027-Phi_DR_SBUA_005-Q004
Request Date:	May 1, 2026
Requester DR No.:	005
Requesting Party:	Small Business Utility Advocates
Requester:	Ariel Strauss/Jennifer Weberski
Date Sent:	May 13, 2026
PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 004

PG&E states that it has switched from defined scope/lump sum vendor management contracts to unit cost vendor management contracts (see, e.g., PG&E-04 at 8-21, PG&E-04WP at 8-9, 8-3). Was this switch approved in any advice letter, Commission decision, or resolution? If so, please provide the application approval.

ANSWER 004

PG&E is not aware of any advice letter, Commission decision, or resolution that specifically approved the transition from defined scope/lump sum contracts to unit cost contracts for vegetation management.

Contracting strategy decisions are determined by a combination of PG&E Sourcing and Vegetation Management organizations to execute vegetation management work. It is PG&E's understanding that the CPUC reviews and approves vegetation management funding in PG&E's GRCs based on forecasted work scope, historical spending, and cost assumptions, rather than specific vendor contracting mechanisms.

PG&E's cost forecasts in the 2027 GRC were developed using average unit cost assumptions based on historical spending. The average unit costs used for the 2027 forecast are primarily based on 2023 and 2024 recorded costs and units, when the current contracting approach was in place.

As a result, the contracting approach is already reflected in the historical data underlying the forecast.

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PG&E Data Request No.:	SBUA_005-Q005
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Request Date:	May 1, 2026
Requester DR No.:	005
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QUESTION 005

Please identify any PG&E testimony or workpapers that explain PG&E’s decision to switch from lump sum/defined scope vegetation management vendor contracts to unit pricing contracts.

ANSWER 005

PG&E’s testimony and workpapers do not describe its vegetation management contracting approach in detail, other than noting changes at specific points in time where relevant.

Our testimony and workpapers are intended to provide the information necessary to evaluate the reasonableness of forecasts and do not include detailed descriptions of all underlying operational practices, such as specific contracting approaches. The absence of this level of detail does not indicate that this information does not exist but reflects the level of detail appropriate for ratemaking review.

Historically, PG&E has used unit-based pricing for vegetation management tree work. During the 2018–2022 period, PG&E used different approaches for certain work, including defined scope/lump sum pricing for routine and time-and-equipment pricing. These approaches were described in PG&E’s 2023 General Rate Case testimony, where PG&E explained that its unit cost forecasts were based on the defined scope contracts in place at that time and incorporated the associated cost impacts. PG&E did not provide a separate discussion of the underlying decision to adopt or later discontinue that contracting approach.

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PG&E Data Request No.:	SBUA_005-Q006
PG&E File Name:	GRC-2027-PhI_DR_SBUA_005-Q006
Request Date:	May 1, 2026
Requester DR No.:	005
Requesting Party:	Small Business Utility Advocates
Requester:	Ariel Strauss/Jennifer Weberski
Date Sent:	May 13, 2026
PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 006

Please identify any PG&E testimony or workpapers that detail any cost savings achieved by PG&E's decision to switch from lump sum/defined scope vegetation management vendor contracts to unit pricing contracts.

ANSWER 006

PG&E's testimony and workpapers do not identify or quantify cost savings specifically tied to a transition from lump sum/defined scope contracts to unit-based pricing.

In the 2023 General Rate Case, PG&E described implementing defined scope contracts starting in late 2020 and noted expected cost reductions related to that approach. However, those discussions were about implementing defined scope - not a transition to unit-based pricing¹.

PG&E's use of defined scope contracts was limited to late 2020 through 2022 – the 2020 GRC period. The return to unit pricing happened during the 2023 GRC period, after the 2023 GRC testimony was filed. As a result, there is no discussion or analysis of cost savings from that change in the testimony or workpapers. By the time of the 2027 GRC, the switch had happened four years before the test year, and any savings for changing contract types were already reflected in the average costs per unit used for the 2027 GRC forecast.

The absence of discussion in testimony does not mean discussion did not occur within PG&E. Rather, it reflects that the GRC filing focused on overall forecast methods and demonstrating the basis for the forecasts (including average costs per unit, work volume, and historical spending during the most recent recorded years 2023 and 2024), rather than attributing cost outcomes to individual contracting structure changes.

¹ Exhibit (PG&E-4) (Feb. 25, 2022), Ch 9 p. 9-56, lines 14-20; p. 9-57 lines 1-29.

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PG&E Data Request No.:	SBUA_005-Q007
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Requesting Party:	Small Business Utility Advocates
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QUESTION 007

Please identify any PG&E testimony or workpapers that detail any cost overrun risk evaluation conducted or cost overrun controls put in place in connection with PG&E's decision to switch from lump sum/defined scope vegetation management vendor contracts to unit pricing contracts.

ANSWER 007

PG&E's 2027 GRC testimony and workpapers do not describe a specific cost overrun risk evaluation or cost overrun controls developed in connection with the transition from lump sum or defined scope contracting to unit-based pricing. The change in contract structure was made during the 2023 GRC period, and by the time of the 2027 GRC, the unit-based approach was already reflected in the historical data used for forecasting.

PG&E manages vegetation management cost risk through ongoing oversight, contract performance monitoring, review of completed work, fixed unit rates, and tracking total spending relative to forecast. These practices are part of PG&E's overall approach to cost management. During the 2023 GRC period, the Vegetation Management Balancing Account (VMBA) reverted to a one-way balancing account; any overcollection is returned to customers. This reinforces the need to manage costs within authorized levels.

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PG&E Data Request No.:	SBUA_005-Q008
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PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 008

Please provide any testimony or workpapers from PG&E's 2023 GRC that explained or justified PG&E's lump sum/defined scope vegetation management vendor contracting approach.

ANSWER 008

PG&E's 2023 General Rate Case (GRC) testimony and supporting workpapers include discussion of the Company's use of defined scope vegetation management contracts implemented in late 2020.

For example, PG&E's 2023 GRC testimony describes the defined scope contracts as the basis for developing unit cost forecasts for routine vegetation management and explains that PG&E entered into these contracts with vendors in late 2020.¹

These references reflect PG&E's discussion of the contracting approach in place during the 2020–2022 timeframe. PG&E's 2023 GRC testimony presents this information in the context of explaining historical costs and forecast development, rather than as a standalone justification of contracting structure.

¹ Exhibit (PG&E-4) (Feb. 25, 2022), Ch 9 p. 9-56, lines 11-20; p. 9-57 lines 1-29.

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QUESTION 009

Please identify the discrete types of units of work (by name) that are priced under PG&E’s vegetation management vendor contracts.

ANSWER 009

PG&E’s vegetation management vendor contracts price work using discrete unit types corresponding to specific field activities, including conductor-clearance pruning, tree felling and dismantling, pole clearing and inspection, vegetation control, and wood management, as summarized in the table below.

Unit Type	Description
Aerial Pruning – Conductor Clearance	Pruning vegetation to maintain required radial clearance distances from electric conductors, including multiple clearance thresholds.
Overhang Maintenance / Clear-to-Sky Pruning	Pruning vegetation overhanging conductors to maintain prescribed “Clear-to-Sky” standards.
Brush Pruning, Clearance, and Treatment	Pruning, clearing, or treating brush and small-diameter vegetation, including chemical treatment where applicable.
Fell Tree Work	Felling entire trees, categorized by tree risk class, where trees can be safely removed in one piece.
Dismantle Tree Work	Dismantling trees by piecing them down, categorized by tree risk class, where felling in one piece is not feasible.
Targeted Pruning – Limbs at Risk	Pruning specific limbs identified as posing a risk to electric facilities, categorized by tree risk class.
Pole Clearing and Inspection	Vegetation inspection and clearing activities associated with poles, including inspection-only and ground/aerial clearing.

Ground and Aerial Clearing for Access or Structures	Clearing vegetation to provide access or clearance around poles, towers, cages, and related electric facilities.
Vegetation Control (Compliance / Right-of-Way Clearing)	Vegetation control activities to maintain compliance clearances around poles and within rights-of-way.
Wood Management	Handling, relocating, and hauling wood and woody debris generated from vegetation management work, including size-based categories.

Please find full list of unit types priced in PG&E Vegetation Management contracts below.

Rate Code	Unit Description
U01	Aerial Pruning - Conductor Clearance - Prune prescribed radial clearance up to 11.9' from conductors
U02	Aerial Pruning - Conductor Clearance - Prune prescribed radial clearance 12' up to 17.9' from conductors
U03	Overhang Maintenance - Prune overhang to maintain Clear to Sky Type 1
U04	Overhang Maintenance - Prune overhang to maintain Clear to Sky Type 2
U05	Overhang Maintenance - Prune overhang to maintain Clear to Sky Type 3
U06	Overhang Maintenance - Prune overhang to maintain Clear to Sky Type 4
U07	Brush Pruning - Prune brush with stems less than 4" DBH
U08	Fell Tree - Fell R1 Tree
U09	Fell Tree - Fell R2 Tree
U10	Fell Tree - Fell R3 Tree
U11	Fell Tree - Fell R4 Tree
U12	Fell Tree - Fell R5 Tree
U13	Targeted Prune - Targeted Prune - Limbs at Risk R1 Tree
U14	Dismantle - Dismantle - Piece Tree Down R1 Tree
U15	Targeted Prune - Targeted Prune - Limbs at Risk R2 Tree
U16	Dismantle - Dismantle - Piece Tree Down R2 Tree
U17	Targeted Prune - Targeted Prune - Limbs at Risk R3 Tree
U18	Dismantle - Dismantle - Piece Tree Down R3 Tree
U19	Targeted Prune - Targeted Prune - Limbs at Risk R4 Tree
U20	Dismantle - Dismantle - Piece Tree Down R4 Tree
U21	Targeted Prune - Targeted Prune - Limbs at Risk R5 Tree
U22	Dismantle - Dismantle - Piece Tree Down R5 Tree
U32	Ground and Aerial - Ground Pole Clear - Clear 10' radius and up to 8' height around base of pole
U33	Ground and Aerial - Ground Cage Clear - Clear inside cage of tower
U34	Ground and Aerial - Ground Tower Clear - Clear 10' perimeter outside tower footings and inside cage
U35	Ground and Aerial - Ground Clear for Access Category 1 - Clear up to 400 square feet
U36	Ground and Aerial - Ground Clear for Access Category 2 - Clear up to 1200 square feet
U37	Ground and Aerial - Aerial Pole Clear - Clear 10' radius starting at 8' height and up to conductor around pole

Rate Code	Unit Description
U38	Ground and Aerial - Aerial Guy Clear - Clear 5' radius from ground to pole connection
U7B	Brush Clearance - Clear brush with stems less than 4" DBH
U7C	Brush Treat - Treat standing brush with an herbicide with stems less than 4" DBH
OP4	Aerial Pruning - Overhang - Prune Clear to Sky Type 4
OP3	Aerial Pruning - Overhang - Prune Clear to Sky Type 3
OP2	Aerial Pruning - Overhang - Prune Clear to Sky Type 2
OP1	Aerial Pruning - Overhang - Prune Clear to Sky Type 1
TEMP1	Aerial Pruning - Conductor Clearance - Prune prescribed radial clearance 18' or greater from conductors
CTEMP8	Off- Cycle Wood Management - Haul Size 4 Fibrous Material
CTEMP7	Off- Cycle Wood Management - Haul Size 3 Fibrous Material
CTEMP6	Off- Cycle Wood Management - Haul Size 2 Fibrous Material
OWI	Off- Cycle Wood Management - Haul Size 1 Fibrous Material
OWH	Off- Cycle Wood Management - Haul Offsite Size 4 Wood and Woody Debris
OWG	Off- Cycle Wood Management - Haul Offsite Size 3 Wood and Woody Debris
OWF	Off- Cycle Wood Management - Haul Offsite Size 2 Wood and Woody Debris
OWE	Off- Cycle Wood Management - Haul Offsite Size 1 Wood and Woody Debris
OWD	Off- Cycle Wood Management - Relocate Size 4 Woody Debris
OWC	Off- Cycle Wood Management - Relocate Size 3 Woody Debris
OWB	Off- Cycle Wood Management - Relocate Size 2 Woody Debris
OWA	Off- Cycle Wood Management - Relocate Size 1 Woody Debris
MA5	Off-Cycle Dismantle Tree - Dismantle - Piece Tree Down R5 Tree
MN5	Off-Cycle Targeted Prune - Targeted Prune - Limbs at Risk R5 Tree
MA4	Off-Cycle Dismantle Tree - Dismantle - Piece Tree Down R4 Tree
MN4	Off-Cycle Targeted Prune - Targeted Prune - Limbs at Risk R4 Tree
MA3	Off-Cycle Dismantle Tree - Dismantle - Piece Tree Down R3 Tree
MN3	Off-Cycle Targeted Prune - Targeted Prune - Limbs at Risk R3 Tree
MA2	Off-Cycle Dismantle Tree - Dismantle - Piece Tree Down R2 Tree
MN2	Off-Cycle Targeted Prune - Targeted Prune - Limbs at Risk R2 Tree
MA1	Off-Cycle Dismantle Tree - Dismantle - Piece Tree Down R1 Tree
MN1	Off-Cycle Targeted Prune - Targeted Prune - Limbs at Risk R1 Tree
FT5	Off-Cycle Fell Tree - Fell R5 Tree
FT4	Off-Cycle Fell Tree - Fell R4 Tree
FT3	Off-Cycle Fell Tree - Fell R3 Tree
FT2	Off-Cycle Fell Tree - Fell R2 Tree
FT1	Off-Cycle Fell Tree - Fell R1 Tree
BST	Off-Cycle Brush Treat - Treat standing brush with an herbicide with stems less than 4" DBH
BPG	Off-Cycle Brush Clearance - Clear brush with stems less than 4" DBH
BP1	Off-Cycle Brush Pruning - Prune brush with stems less than 4" DBH
OP8	Off-Cycle Aerial Pruning - Overhang - Prune Clear to Sky Type 4
OP7	Off-Cycle Aerial Pruning - Overhang - Prune Clear to Sky Type 3
OP6	Off-Cycle Aerial Pruning - Overhang - Prune Clear to Sky Type 2
OP5	Off-Cycle Aerial Pruning - Overhang - Prune Clear to Sky Type 1
CTEMP4	Off-Cycle Aerial Pruning - Conductor Clearance - Prune prescribed radial clearance 18' or greater from conductors

Rate Code	Unit Description
RD2	Off-Cycle Aerial Pruning - Conductor Clearance - Prune prescribed radial clearance 12' up to 17.9' from conductors
RD1	Off-Cycle Aerial Pruning - Conductor Clearance - Prune prescribed radial clearance up to 11.9' from conductors
UOA	Off-Cycle Overhang Maintenance - Prune overhang to maintain Clear to Sky Type 1
UOB	Off-Cycle Overhang Maintenance - Prune overhang to maintain Clear to Sky Type 2
UOC	Off-Cycle Overhang Maintenance - Prune overhang to maintain Clear to Sky Type 3
UOD	Off-Cycle Overhang Maintenance - Prune overhang to maintain Clear to Sky Type 4
ND1	Post Natural Disaster - Dismantle Tree - Dismantle - Piece Tree Down R5 Tree
ND0	Post Natural Disaster - Targeted Prune - Targeted Prune - Limbs at Risk R5 Tree
NDZ	Post Natural Disaster - Dismantle Tree - Dismantle - Piece Tree Down R4 Tree
NDY	Post Natural Disaster - Targeted Prune - Targeted Prune - Limbs at Risk R4 Tree
NDX	Post Natural Disaster - Dismantle Tree - Dismantle - Piece Tree Down R3 Tree
NDW	Post Natural Disaster - Targeted Prune - Targeted Prune - Limbs at Risk R3 Tree
NDV	Post Natural Disaster - Dismantle Tree - Dismantle - Piece Tree Down R2 Tree
NDU	Post Natural Disaster - Targeted Prune - Targeted Prune - Limbs at Risk R2 Tree
NDT	Post Natural Disaster - Dismantle Tree - Dismantle - Piece Tree Down R1 Tree
NDS	Post Natural Disaster - Targeted Prune - Targeted Prune - Limbs at Risk R1 Tree
NDR	Post Natural Disaster - Fell Tree - Fell R5 Tree
NDQ	Post Natural Disaster - Fell Tree - Fell R4 Tree
NDP	Post Natural Disaster - Fell Tree - Fell R3 Tree
NDO	Post Natural Disaster - Fell Tree - Fell R2 Tree
NDN	Post Natural Disaster - Fell Tree - Fell R1 Tree
NDM	Post Natural Disaster - Brush Treat - Treat standing brush with an herbicide with stems less than 4" DBH
NDL	Post Natural Disaster - Brush Clearance - Clear brush with stems less than 4" DBH
NDK	Post Natural Disaster - Brush Pruning - Prune brush with stems less than 4" DBH
NDJ	Post Natural Disaster - Overhang Maintenance - Prune overhang to maintain Clear to Sky Type 4
NDI	Post Natural Disaster - Overhang Maintenance - Prune overhang to maintain Clear to Sky Type 3
NDH	Post Natural Disaster - Overhang Maintenance - Prune overhang to maintain Clear to Sky Type 2
NDG	Post Natural Disaster - Overhang Maintenance - Prune overhang to maintain Clear to Sky Type 1
NDF	Post Natural Disaster - Aerial Pruning - Overhang - Prune Clear to Sky Type 4
NDE	Post Natural Disaster - Aerial Pruning - Overhang - Prune Clear to Sky Type 3
NDD	Post Natural Disaster - Aerial Pruning - Overhang - Prune Clear to Sky Type 2
NDC	Post Natural Disaster - Aerial Pruning - Overhang - Prune Clear to Sky Type 1
CTEMP3	Post Natural Disaster - Aerial Pruning - Conductor Clearance - Prune prescribed radial clearance 18' or greater from conductors
NDB	Post Natural Disaster - Aerial Pruning - Conductor Clearance - Prune prescribed radial clearance 12' up to 17.9' from conductors
NDA	Post Natural Disaster - Aerial Pruning - Conductor Clearance - Prune prescribed radial clearance up to 11.9' from conductors
PW2	Post Wildfire - Dismantle Tree - Dismantle - Piece Tree Down R5 Tree
PW1	Post Wildfire - Targeted Prune - Targeted Prune - Limbs at Risk R5 Tree

Rate Code	Unit Description
PWZ	Post Wildfire - Dismantle Tree - Dismantle - Piece Tree Down R4 Tree
PWY	Post Wildfire - Targeted Prune - Targeted Prune - Limbs at Risk R4 Tree
PWX	Post Wildfire - Dismantle Tree - Dismantle - Piece Tree Down R3 Tree
PWW	Post Wildfire - Targeted Prune - Targeted Prune - Limbs at Risk R3 Tree
PWV	Post Wildfire - Dismantle Tree - Dismantle - Piece Tree Down R2 Tree
PWU	Post Wildfire - Targeted Prune - Targeted Prune - Limbs at Risk R2 Tree
PWT	Post Wildfire - Dismantle Tree - Dismantle - Piece Tree Down R1 Tree
PWS	Post Wildfire - Targeted Prune - Targeted Prune - Limbs at Risk R1 Tree
PWR	Post Wildfire - Fell Tree - Fell R5 Tree
PWQ	Post Wildfire - Fell Tree - Fell R4 Tree
PWP	Post Wildfire - Fell Tree - Fell R3 Tree
PWO	Post Wildfire - Fell Tree - Fell R2 Tree
PWN	Post Wildfire - Fell Tree - Fell R1 Tree
PWM	Post Wildfire - Brush Treat - Treat standing brush with an herbicide with stems less than 4" DBH
PWL	Post Wildfire - Brush Clearance - Clear brush with stems less than 4" DBH
PWK	Post Wildfire - Brush Pruning - Prune brush with stems less than 4" DBH
PWJ	Post Wildfire - Overhang Maintenance - Prune overhang to maintain Clear to Sky Type 4
PWI	Post Wildfire - Overhang Maintenance - Prune overhang to maintain Clear to Sky Type 3
PWH	Post Wildfire - Overhang Maintenance - Prune overhang to maintain Clear to Sky Type 2
PWG	Post Wildfire - Overhang Maintenance - Prune overhang to maintain Clear to Sky Type 1
PWF	Post Wildfire - Aerial Pruning - Overhang - Prune Clear to Sky Type 4
PWE	Post Wildfire - Aerial Pruning - Overhang - Prune Clear to Sky Type 3
PWD	Post Wildfire - Aerial Pruning - Overhang - Prune Clear to Sky Type 2
PWC	Post Wildfire - Aerial Pruning - Overhang - Prune Clear to Sky Type 1
CTEMP2	Post Wildfire - Aerial Pruning - Conductor Clearance - Prune prescribed radial clearance 18' or greater from conductors
PWB	Post Wildfire - Aerial Pruning - Conductor Clearance - Prune prescribed radial clearance 12' up to 17.9' from conductors
PWA	Post Wildfire - Aerial Pruning - Conductor Clearance - Prune prescribed radial clearance up to 11.9' from conductors
OD5	Orchard Dismantle Tree - Dismantle - Piece Tree Down R5 Tree
OD0	Orchard Targeted Prune - Targeted Prune - Limbs at Risk R5 Tree
OD4	Orchard Dismantle Tree - Dismantle - Piece Tree Down R4 Tree
OD9	Orchard Targeted Prune - Targeted Prune - Limbs at Risk R4 Tree
OD3	Orchard Dismantle Tree - Dismantle - Piece Tree Down R3 Tree
OD8	Orchard Targeted Prune - Targeted Prune - Limbs at Risk R3 Tree
OD2	Orchard Dismantle Tree - Dismantle - Piece Tree Down R2 Tree
OD7	Orchard Targeted Prune - Targeted Prune - Limbs at Risk R2 Tree
OD1	Orchard Dismantle Tree - Dismantle - Piece Tree Down R1 Tree
OD6	Orchard Targeted Prune - Targeted Prune - Limbs at Risk R1 Tree
OF5	Orchard Fell Tree - Fell R5 Tree
OF4	Orchard Fell Tree - Fell R4 Tree
OF3	Orchard Fell Tree - Fell R3 Tree
OF2	Orchard Fell Tree - Fell R2 Tree
OF1	Orchard Fell Tree - Fell R1 Tree

Rate Code	Unit Description
OBT	Orchard Brush Treat - Treat standing brush with an herbicide with stems less than 4" DBH
O4R	Orchard Brush Clearance - Clear brush with stems less than 4" DBH
O3R	Orchard Brush Pruning - Prune brush with stems less than 4" DBH
CTEMP1	Orchard Aerial Pruning - Conductor Clearance - Prune prescribed radial clearance 18' or greater from conductors
O2R	Orchard Aerial Pruning - Conductor Clearance - Prune prescribed radial clearance 12' up to 17.9' from conductors
O1R	Orchard Aerial Pruning - Conductor Clearance - Prune prescribed radial clearance up to 11.9' from conductors
TEMP10	Ground and Aerial - Ground Tower Clear - Partial (One-Legged) Clear 25' radius or less than 50 percent and/or up to 2,000 sq ft
TEMP9	Ground and Aerial - Ground Tower Clear - Partial (Four-Legged) Clear 25' radius or less than 50 percent and/or up to 4,500 sq ft
TEMP8	Ground and Aerial - Ground Tower Clear - Full Four-Legged Tower Clear 50' radius and/or up to 12,500 sq ft
TEMP7	Ground and Aerial - Ground Tower Clear - Full Three-Legged Tower Clear 50' radius and/or up to 16,500 sq ft
TEMP6	Ground and Aerial - Ground Tower Clear - Full Two-Legged Tower Clear 50' radius and/or up to 12,500 sq ft
TEMP5	Ground and Aerial - Ground Tower Clear - Full One-Legged Tower Clear 50' radius and/or up to 8,000 sq ft
TEMP4	Wood Management - Haul Size 4 Fibrous Material
TEMP3	Wood Management - Haul Size 3 Fibrous Material
TEMP2	Wood Management - Haul Size 2 Fibrous Material
WW9	Wood Management - Haul Size 1 Fibrous Material
WW8	Wood Management - Haul Offsite Size 4 Wood and Woody Debris
WW7	Wood Management - Haul Offsite Size 3 Wood and Woody Debris
WW6	Wood Management - Haul Offsite Size 2 Wood and Woody Debris
WW5	Wood Management - Haul Offsite Size 1 Wood and Woody Debris
WW4	Wood Management - Relocate Size 4 Woody Debris
WW3	Wood Management - Relocate Size 3 Woody Debris
WW2	Wood Management - Relocate Size 2 Woody Debris
WW1	Wood Management - Relocate Size 1 Woody Debris
VC01	Pole Clearing - Inspect Only
VC02	Pole Clearing - Ground Pole Clear
VC03	Pole Clearing - Ground Pole Clear: 2 Leg Pole
VC04	Pole Clearing - Ground Pole Clear: 3 Leg Pole
VC05	Pole Clearing - Ground Pole Clear: 4 Leg Pole
VC06	Pole Clearing - Aerial Clear
VC07	Pole Clearing - Chem Treated Pole Maintenance
VCA01	Pole Clearing - Chem Adder
VCA02	Pole Clearing - Newly Added Poles
VCA03	Pole Clearing - Ad-Hoc Clear
VCA04	Pole Clearing - Ad-Hoc Inspection
VCA05	Pole Clearing - Stump Treatment

**PACIFIC GAS AND ELECTRIC COMPANY
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Data Response**

PG&E Data Request No.:	SBUA_005-Q010
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Request Date:	May 1, 2026
Requester DR No.:	005
Requesting Party:	Small Business Utility Advocates
Requester:	Ariel Strauss/Jennifer Weberski
Date Sent:	May 13, 2026
PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 010

Please identify the pages testimony or workpapers that state the vegetation management unit costs for the test year that PG&E is using to justify the cost amounts requested in this GRC.

ANSWER 010

Vegetation Management’s average costs per unit used to develop the test year forecast are provided in PG&E’s Chapter 8 workpapers.

The workpapers show unit based forecast details that include:

- average cost per unit
- units of work
- total cost

Workpaper Table	WP Page	2027 Forecast Average Unit Cost
Workpaper Table 8 7 – Routine Vegetation Management: Annual/Routine Patrol Trim and Removal Work	WP 8-7	\$478
Workpaper Table 8 8 – Vegetation Control Forecast Details	WP 8-9	\$304
Workpaper Table 8 9 – Hazard Patrol Trim and Removal Work Forecast Details	WP 8-10	\$500
Workpaper Table 8 10 – Targeted Inspection Forecast Details	WP 8-12	\$1,685
Workpaper Table 8 11 – Tree Removal Inventory Tree Work Forecast Details	WP 8-13	\$959
Workpaper Table 8 12 – Vegetation Management for Operational Mitigations Forecast Details	WP 8-14	\$1,026
Workpaper Table 8 14 – Wood Management (Routine & Hazard Patrol Programs)	WP 8-16	\$80
Workpaper Table 8 14 – Wood Management (Wildfire Mitigation Programs)	WP 8-16	\$1,741

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

PG&E Data Request No.:	SBUA_005-Q011
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Request Date:	May 1, 2026
Requester DR No.:	005
Requesting Party:	Small Business Utility Advocates
Requester:	Ariel Strauss/Jennifer Weberski
Date Sent:	May 13, 2026
PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 011

Please identify by name the five most numerous unit types of work in current vegetation management contracts.

ANSWER 011

See table below for the five most numerous unit types of work in current vegetation management contracts, based on unit work volumes in 2025.

Unit Code	Unit Type	Unit Description
U02	Radial 12' or greater	Aerial Pruning – Conductor Clearance – Prune prescribed radial clearance 12' up to 17.9' from conductors
VC01	Inspect Only (Pole Clearing)	Pole Clearing – Inspect Only
U14	Dismantle R1 Tree Major	Dismantle – Piece Tree Down R1 Tree
U16	Dismantle R2 Tree Major	Dismantle – Piece Tree Down R2 Tree
U01	Radial up to 11.99'	Aerial Pruning – Conductor Clearance – Prune prescribed radial clearance up to 11.9' from conductors

**PACIFIC GAS AND ELECTRIC COMPANY
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Application 25-05-009
Data Response**

PG&E Data Request No.:	SBUA_005-Q012
PG&E File Name:	GRC-2027-Phi_DR_SBUA_005-Q012
Request Date:	May 1, 2026
Requester DR No.:	005
Requesting Party:	Small Business Utility Advocates
Requester:	Ariel Strauss/Jennifer Weberski
Date Sent:	May 13, 2026
PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 012

Is vegetation management unit pricing uniform across all vendors?

ANSWER 012

Vegetation management unit type pricing and pricing structure is uniform across all vendors. However, unit prices may vary by region and division and by supplier due to differences in geographic conditions across PG&E's service territory, and variations within vendor's operating environments and practices.

**PACIFIC GAS AND ELECTRIC COMPANY
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Application 25-05-009
Data Response**

PG&E Data Request No.:	SBUA_005-Q014
PG&E File Name:	GRC-2027-Phi_DR_SBUA_005-Q014
Request Date:	May 1, 2026
Requester DR No.:	005
Requesting Party:	Small Business Utility Advocates
Requester:	Ariel Strauss/Jennifer Weberski
Date Sent:	May 13, 2026
PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 014

What process is in place for PG&E to enable a different vendor to take over work in the event that the originally contracted vendor lacks adequate staff or is otherwise is unable to complete all necessary work in a given geographic area?

ANSWER 014

PG&E's Vegetation Management utilizes a regional and divisional contract structure with a singular prime contractor and multiple backup contractors with pre-negotiated unit rates established in contracts available in every division to activate in the event additional support is needed.

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Data Response**

PG&E Data Request No.:	SBUA_005-Q015
PG&E File Name:	GRC-2027-Phi_DR_SBUA_005-Q015
Request Date:	May 1, 2026
Requester DR No.:	005
Requesting Party:	Small Business Utility Advocates
Requester:	Ariel Strauss/Jennifer Weberski
Date Sent:	May 13, 2026
PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 015

If vendors are required to perform more work than anticipated, are there provisions for overtime, weekend/holiday rates, roving or roaming charges or other charges for above-expected, expedited or different-than-expected work? If so, please describe the nature of each type of charge and state whether each is uniform across vendors?

ANSWER 015

PG&E Vegetation Management utilizes a standardized and uniform process to capture vendor requests for additional cost through a time and material form requiring multiple levels of validation prior to providing documented approval of additional work. Additional work is charged based on pre-negotiated labor rates established in vendor contracts upon PG&E documented approval.

**PACIFIC GAS AND ELECTRIC COMPANY
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Application 25-05-009
Data Response**

PG&E Data Request No.:	SBUA_005-Q016
PG&E File Name:	GRC-2027-Phi_DR_SBUA_005-Q016
Request Date:	May 1, 2026
Requester DR No.:	005
Requesting Party:	Small Business Utility Advocates
Requester:	Ariel Strauss/Jennifer Weberski
Date Sent:	May 13, 2026
PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 016

In connection with its vegetation management cost forecasts for the 2027 GRC, has PG&E evaluated the effect on cost and ability to meet its WMP-committed level of vegetation management in the event that PG&E’s largest vendors are required to stand-down or pause work? Please provide any applicable workpapers.

ANSWER 016

PG&E vegetation management contract structure establishes backup suppliers for every division with pre-negotiated unit pricing. Vegetation Management vendors include multiple large, nationwide vendors that have the ability to ramp up to meet PG&E needs from within or outside of PG&E’s service territory while utilizing the pre-negotiated pricing as established in their contracts.

The forecasted costs are not based on any individual vendor or contract. Rather, the forecast reflects average unit cost assumptions developed from historical costs and work volumes across the program. These average unit costs represent an aggregation of many work types and contracts across multiple vendors.

As a result, shifting work among vendors — including in situations where a vendor is unavailable — would not change the underlying cost basis used to develop the forecast.

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Data Response

PG&E Data Request No.:	SBUA_005-Q017
PG&E File Name:	GRC-2027-PhI_DR_SBUA_005-Q017
Request Date:	May 1, 2026
Requester DR No.:	005
Requesting Party:	Small Business Utility Advocates
Requester:	Ariel Strauss/Jennifer Weberski
Date Sent:	May 13, 2026
PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 017

In connection with its vegetation management cost forecasts for the 2027 GRC, has PG&E undertaken scenario planning to evaluate the cost implications of and/or capability of vegetation management vendors to meet vegetation management requirements under a variety of scenarios, other than the PG&E's expected vegetation management forecast?

If yes,

- a. Please identify any relevant discussion in testimony or workpapers and
- b. Please generally describe the scenarios considered.

ANSWER 017

PG&E has not conducted formal scenario planning analyses for vegetation management costs in the 2027 GRC. Instead, PG&E's forecasts are based on average unit costs and historical work volumes, which already reflect a range of operating conditions.

- a. PG&E does not identify or discuss scenario planning analyses in its testimony or supporting workpapers.
- b. PG&E considers capacity of individual vendors to meet PG&E requirements through the sourcing process based on the vendor's ability to remain in good standing with the union (if applicable), ramp up, bonding, safety performance, and insurance requirements. Vegetation Management conducts regular reviews of vegetation management vendors in their current allocation.

PACIFIC GAS AND ELECTRIC COMPANY
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PG&E Data Request No.:	SBUA_005-Q018
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Request Date:	May 1, 2026
Requester DR No.:	005
Requesting Party:	Small Business Utility Advocates
Requester:	Ariel Strauss/Jennifer Weberski
Date Sent:	May 13, 2026
PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 018

Has PG&E incurred routine vegetation management cost amounts in 2023, 2024 or 2025 beyond the GRC-forecasted cost levels?

If yes, please

- a. State the total amount of routine vegetation management cost above the GRC-approved level and
- b. Identify any discussion in the testimony or workpapers for the 2027 GRC of lessons learned or changes in PG&E’s practice or forecasting in response to such cost overruns.

ANSWER 018

PG&E evaluates whether routine vegetation management costs exceeded authorized levels by comparing recorded costs to the Commission adopted (imputed adopted) amounts for each year.

- a. Based on the Commission-adopted comparison, PG&E recorded routine vegetation management costs:
 - below the adopted level in 2023,
 - above the adopted level in 2024, and
 - approximately in line with the adopted level in 2025.

A summary of this comparison is shown below:

Year	Imputed Adopted (\$ thousands)	Recorded (\$ thousands)	Variance (\$ thousands)
2023	\$972,013	\$859,187	\$(112,826)
2024	\$965,868	\$1,002,999	\$37,130
2025	\$963,767	\$961,218	\$(2,550)

Total	\$2,901,648	\$2,823,404	\$(78,244)
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PG&E’s Vegetation Management Balancing Account is evaluated over the full GRC funding cycle rather than on a single year basis. Year-to-year variability in recorded costs is reasonable and may occur due to changes in work scope, prioritization, and operating conditions.

Combined, 2023–2025, PG&E’s recorded routine vegetation management costs are approximately \$78 million (about 2.7%) below the cumulative imputed adopted amount of approximately \$2.9 billion. There is an additional year remaining in the 2023 GRC period; therefore 2023-2025 is not a complete picture of whether VM costs for the 2023 GRC period will be above or below imputed adopted.

- b. PG&E does not specifically identify or discuss “lessons learned” from the 2023–2025 period in its 2027 GRC testimony or workpapers.

As mentioned above, the year-to-year variability reflects changes in work scope, prioritization, and operating conditions within the portfolio of vegetation management activities. PG&E’s activity-based forecasting practice is not the cause for any “cost overruns” and PG&E continues to employ that forecast approach.

PACIFIC GAS AND ELECTRIC COMPANY
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Data Response

PG&E Data Request No.:	SBUA_005-Q019
PG&E File Name:	GRC-2027-Phi_DR_SBUA_005-Q019
Request Date:	May 1, 2026
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Requesting Party:	Small Business Utility Advocates
Requester:	Ariel Strauss/Jennifer Weberski
Date Sent:	May 13, 2026
PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 019

Concerning the cost exceedances discussed in the previous question, was any portion of cost exceedances in 2023, 2024 and 2025 due to increases in vegetation management vendor rates or charges (as opposed solely to greater volume of activity or costs unrelated to vegetation management contracts)?

If the answer is yes, please

- a. provide copies of any testimony submitted in any application explaining these vendor cost exceedances or
- b. for any costs not yet sought in a submitted application, please generally describe the nature and reason for the vendor cost exceedance.

ANSWER 019

Routine vegetation management costs were above imputed adopted amounts in only one year, 2024. The amount above imputed-adopted was ~ \$37 million, of which, ~ \$33 million is attributable to additional pole-clearing.¹

- a. PG&E has not submitted testimony or applications that attribute routine vegetation management costs above adopted amounts to vendor rate increases.
- b. The additional pole-clearing units were completed to address elevated ignition risk associated with R3+ weather condition ignitions and SMU fuses.

¹ Ex. PG&E-4, Ch. 8, WP Table 8-8, p. WP 8-9. Line 7.

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

PG&E Data Request No.:	SBUA_005-Q021
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Request Date:	May 1, 2026
Requester DR No.:	005
Requesting Party:	Small Business Utility Advocates
Requester:	Ariel Strauss/Jennifer Weberski
Date Sent:	May 13, 2026
PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 021

Has PG&E undertaken a market study or other evaluation of the vegetation management workforce in California to determine forecasted labor availability and cost trends over the course of the GRC period? If yes, please (a) explain and (b) identify any discussion of this information in PG&E's testimony or workpapers.

ANSWER 021

PG&E has not undertaken a market study or other evaluation of the vegetation management workforce in California to determine forecasted labor availability and cost trends over the course of the GRC period.

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

PG&E Data Request No.:	SBUA_005-Q022
PG&E File Name:	GRC-2027-Phi_DR_SBUA_005-Q022
Request Date:	May 1, 2026
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Requesting Party:	Small Business Utility Advocates
Requester:	Ariel Strauss/Jennifer Weberski
Date Sent:	May 13, 2026
PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 022

How has PG&E forecasted the cost for vegetation management work to be performed in future years under contracts that are set to expire before the date when the work will be performed?

ANSWER 022

PG&E's cost forecasts use unit-based cost assumptions informed by current contract rates, historical experience, and expected market conditions. These forecasts are not limited to specific existing contracts and therefore reflect expected future conditions rather than reliance on any individual contracts expiring prior to the forecast period.

PACIFIC GAS AND ELECTRIC COMPANY
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Data Response

PG&E Data Request No.:	SBUA_005-Q023
PG&E File Name:	GRC-2027-Phi_DR_SBUA_005-Q023
Request Date:	May 1, 2026
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Requesting Party:	Small Business Utility Advocates
Requester:	Ariel Strauss/Jennifer Weberski
Date Sent:	May 13, 2026
PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 023

PG&E states in rebuttal testimony that it “establishes market-based unit and labor rates through competitive sourcing events”. Please explain (a) what are competitive sourcing events and (b) PG&E’s method of determining market-based rates.

ANSWER 023

- a. Competitive sourcing events are bid events where PG&E solicits proposals and/or price quotes for a given scope or type of work from multiple suppliers and then based on an evaluation of those proposals/quotes selects one or more of the bidders to be PG&E's primary supplier(s) for that work.
- b. Methods of determining market-based rates can vary by event but are most commonly based on the rates proposed by the bidders participating in the event itself compared with previously paid comparable rates (if applicable).

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

PG&E Data Request No.:	SBUA_005-Q024
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Requesting Party:	Small Business Utility Advocates
Requester:	Ariel Strauss/Jennifer Weberski
Date Sent:	May 13, 2026
PG&E Witness(es):	Kamran Rasheed – Electric Operations

QUESTION 024

Please identify the pages of testimony or workpapers stating the vegetation management vendor cost escalation forecast proposed for post-test year vegetation management costs.

ANSWER 024

PG&E does not present a vegetation management vendor-specific cost escalation forecast for post-test year costs in its testimony or supporting workpapers.

As stated in testimony Exhibit PG&E-04, Chapter 8, page 8-5:

“Forecasts in this chapter are shown with no escalation included in all expense totals. PG&E will offset escalation through work execution efficiencies to improve affordability.”

Testimony on page 8-8 explains that MWC HN (routine vegetation management) costs are forecast to decrease year-over-year, primarily due to operational efficiencies such as incorporating vegetation management activities into routine. As a result, simple attrition/escalation is not appropriate in the attrition years (2028–2030). Instead, PG&E requests that each attrition year for MWC HN be separately authorized in the GRC, and that the cost basis not be based solely on the 2027 GRC test year with simple escalation factors.

Vendor costs are reflected in our average cost per unit, which generally stays flat. No specific pages identify a vendor cost escalation forecast; cost trends are shown in the average unit costs and overall forecast in the testimony and workpapers.