

Docket:	:	<u>A.25-05-009</u>
Exhibit Number	:	<u>CA-41</u>
Commissioner	:	<u>Matthew Baker</u>
Admin. Law Judge	:	<u>Darryl J. Gruen</u>
	:	



PUBLIC ADVOCATES OFFICE
California Public Utilities Commission

**PG&E Response to Cal Advocates Data Request PubAdv-
PG&E-331-DAO
September 21, 2026**

San Francisco, California
October 23, 2026

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

PG&E Data Request No.:	CalAdvocates_331-Q001
PG&E File Name:	GRC-2027-PhI_DR_CalAdvocates_331-Q001
Request Date:	September 8, 2026
Requester DR No.:	331
Requesting Party:	Public Advocates Office
Requester:	Dao Phan
Date Sent:	September 21, 2026
PG&E Witness(es):	

SUBJECT: PG&E's DEFERMENT OF PLANNED INVESTMENT

Please refer to PG&E's Press Release dated September 2, 2026, in which PG&E states it "expects to defer approximately \$2 billion of planned investment...in California in 2027."¹ Please also refer to PG&E's post-Legislative session update where PG&E lists the following types of work that will be delayed or deferred as part of the \$2 billion deferment mentioned above: Connecting new housing projects; Interconnecting new renewable generation projects; Technology upgrades; Large load beyond initial 1.8 GWs; Other.² Answer the following questions and provide the requested information.

QUESTION 001

Identify the investments PG&E plans to defer by program and annual deferment amounts for electric and gas operations. For each identified investment, identify the category for that investment as stated in PG&E's post-Legislative session update mentioned above.³ Specifically, indicate which of the following categories the identified investment falls into: Connecting new housing projects; Interconnecting new renewable generation projects; Technology upgrades; Large load beyond initial 1.8 GWs; Other.

- a. For each deferred program, identify the Major Work Category (MWC) and the proceeding from which the funding was authorized. For deferred work that is part of PG&E's 2027 GRC request, please see question 6, below.

¹ 1PG&E Launches Strategic Review to Build a Better, More Affordable Energy Future for California Customers, PG&E Newsroom Press Release, September 2, 2026, available at: https://www.pge.com/en/newsroom/press-release_details.77a6f479-b055-45f1-bbea-0bea442774c2.html [accessed on September 4, 2026].

² Turning Point For PG&E and California, PG&E Corporation Post Legislative Session Update, September 2, 2026 (PG&E September 2, 2026 Leg Update) at 4, available at: https://s21.q4cdn.com/673114418/files/content_files/PG-E Post-Legislative-Session-Update-2026.pdf [accessed on September 4, 2026].

³ PG&E September 2, 2026 Leg Update at 4.

- b. Provide a copy of PG&E's risk management analyses regarding the deferment and discuss how identified risks will be mitigated.
- c. Explain in detail how PG&E plans to continue to fund critical safety programs and maintain current performance on compliance obligations, including its Wildfire Mitigation Plan and safety certification requirements, with a reduction of \$2 billion in work activities.

ANSWER 001

Our September 2, 2026 announcement regarding the deferral of “approximately \$2 billion of planned investment” in 2027 does not change the underlying work and funding that is necessary for us to continue providing safe, reliable, clean, and affordable service to customers over the 2027-2030 GRC period. We still believe our GRC request includes the right mix of work and level of funding necessary to best serve our customers and communities, and to meet expected growth and fulfill California's policy goals. While we continue to advocate for the capital investments presented in our GRC, the announced capital investment reduction in 2027 is a near-term step to reduce financing costs while still maintaining our operational performance. The capital work we do for customers is financed by borrowing or by issuing equity. Thus, the capital investment reduction will enable us to borrow less money and avoid expensive interest rates that would drive up customer costs. Notwithstanding near-term capital reductions to our plan, we expect to maintain safety and compliance obligations.

The question seeks information regarding how the capital reductions will impact work that is part of PG&E's 2027 GRC. As a threshold matter, the capital reductions will be made fairly even across FERC- and CPUC-funded work. Therefore, only approximately half of the \$2 billion reduction will relate to CPUC-funded work. With that said, we are still in the process of evaluating and identifying the specific programs to be deferred in 2027, and do not expect to be completed with our evaluation and decision-making until sometime in mid 4Q of 2026. Therefore, we are unable to identify specific programs that will be reduced at this time.

We address the specific subparts of the question below.

- a-b. These two subparts seek information regarding the specific MWCs corresponding to capital reductions and risk-analyses.

As noted above, we are still evaluating and identifying the specific programs to be deferred in 2027. As such, we are unable to identify the corresponding MWCs for each deferred program or provide any associated risk-management analyses.

While still under review, the types of work that may be impacted include:

- Work to further improve the reliability of the electrical system.
- The rate at which new customers are connected. (Note – PG&E still intends to meet CPUC customer energization timelines in accordance with SB 410 (Powering Up Californians Act) and AB 50.
- The rate at which new energy supply projects will be connected to the grid.

We will continue to fund critical safety programs and maintain current performance on compliance obligations, including our Wildfire Mitigation Plan. Therefore, there will not be a need to mitigate reductions in safety programs.

- c. We plan on funding critical safety programs utilizing the same mechanisms and sources of funding that currently fund work. This includes utilizing investment funds financed through long-term and short-term debt instruments; retaining earnings to re-invest in the company; and reducing spending in certain areas and reprioritizing available funding.

We still expect 2027 to be one of the largest investment years in the company's history. Our capital investment plan for 2027 will be approximately \$11.4 billion, similar to our average investment levels in 2024 and 2025.

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PG&E Data Request No.:	CalAdvocates_331-Q002
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Requesting Party:	Public Advocates Office
Requester:	Dao Phan
Date Sent:	September 21, 2026
PG&E Witness(es):	

SUBJECT: PG&E’S DEFERMENT OF PLANNED INVESTMENT

Please refer to PG&E’s Press Release dated September 2, 2026, in which PG&E states it “expects to defer approximately \$2 billion of planned investment...in California in 2027.”¹ Please also refer to PG&E’s post-Legislative session update where PG&E lists the following types of work that will be delayed or deferred as part of the \$2 billion deferment mentioned above: Connecting new housing projects; Interconnecting new renewable generation projects; Technology upgrades; Large load beyond initial 1.8 GWs; Other.² Answer the following questions and provide the requested information.

QUESTION 002

Provide a copy of the original 2027 Capital Plan referenced in the Press Release and a listing of the proposed updates.

ANSWER 002

We are still in the process of evaluating and identifying the specific programs to be deferred in 2027, and do not expect to be completed with our evaluation and decision-making until sometime in mid 4Q of 2026. Therefore, we are unable to provide a list of proposed updates to our 2027 Capital Plan at this time.

Please see PG&E’s response to Question 1.

¹ 1PG&E Launches Strategic Review to Build a Better, More Affordable Energy Future for California Customers, PG&E Newsroom Press Release, September 2, 2026, available at: https://www.pge.com/en/newsroom/press-release_details.77a6f479-b055-45f1-bbea-0bea442774c2.html [accessed on September 4, 2026].

² Turning Point For PG&E and California, PG&E Corporation Post Legislative Session Update, September 2, 2026 (PG&E September 2, 2026 Leg Update) at 4, available at: https://s21.q4cdn.com/673114418/files/content_files/PG-E Post-Legislative-Session-Update-2026.pdf [accessed on September 4, 2026].

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PG&E Data Request No.:	CalAdvocates_331-Q003
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QUESTION 003

Provide a copy of the analysis PG&E performed to identify which work activity PG&E would delay/defer or accelerate in 2027.

ANSWER 003

We are still in the process of evaluating and identifying the specific programs to be deferred in 2027, and do not expect to be completed with our evaluation and decision-making until sometime in mid 4Q of 2026. Therefore, we are unable to provide the requested analysis at this time.

¹ 1PG&E Launches Strategic Review to Build a Better, More Affordable Energy Future for California Customers, PG&E Newsroom Press Release, September 2, 2026, available at: https://www.pge.com/en/newsroom/press-release_details.77a6f479-b055-45f1-bbea-0bea442774c2.html [accessed on September 4, 2026].

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PG&E Data Request No.:	CalAdvocates_331-Q004
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SUBJECT: PG&E’S DEFERMENT OF PLANNED INVESTMENT

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QUESTION 004

Provide PG&E’s definition of “delayed” and “deferred” and explain how PG&E proposes to treat the deferred/delayed work activities after 2027.

ANSWER 004

PG&E uses the terms “delayed” and “deferred” consistent with the ordinary and plain meaning of the terms – i.e. work is expected to be completed at a later date than initially planned or forecast.

D.23-11-069 also provides a definition of deferred work that PG&E expects will be adopted in the 2027 GRC decision.

¹ 1PG&E Launches Strategic Review to Build a Better, More Affordable Energy Future for California Customers, PG&E Newsroom Press Release, September 2, 2026, available at: https://www.pge.com/en/newsroom/press-release_details.77a6f479-b055-45f1-bbea-0bea442774c2.html [accessed on September 4, 2026].

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PG&E Data Request No.:	CalAdvocates_331-Q005
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SUBJECT: PG&E’S DEFERMENT OF PLANNED INVESTMENT

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QUESTION 005

Please provide PG&E’s analysis of how PG&E will have the capacity to increase the pace of work after 2027 to address the \$2 billion in deferred work.

ANSWER 005

PG&E anticipates adjusting its capacity to increase the pace of work through various staffing adjustments, which may include hiring additional employees, engaging contractor resources, and reallocating existing resources.

¹ 1PG&E Launches Strategic Review to Build a Better, More Affordable Energy Future for California Customers, PG&E Newsroom Press Release, September 2, 2026, available at: https://www.pge.com/en/newsroom/press-release_details.77a6f479-b055-45f1-bbea-0bea442774c2.html [accessed on September 4, 2026].

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QUESTION 006

Is any of the \$2 billion work deferment part of any of the expense or capital expenditures PG&E is requesting in its 2027 GRC application? If yes, please identify the program, MWC, and amount requested and provide a citation to the testimony and/or workpapers in which the PG&E request is discussed.

ANSWER 006

Please see PG&E’s response to Question 1.

¹ 1PG&E Launches Strategic Review to Build a Better, More Affordable Energy Future for California Customers, PG&E Newsroom Press Release, September 2, 2026, available at: https://www.pge.com/en/newsroom/press-release_details.77a6f479-b055-45f1-bbea-0bea442774c2.html [accessed on September 4, 2026].

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QUESTION 007

Please explain, in detailed narrative form, the reason that PG&E chose to defer projects related to the following categories: Connecting new housing projects; Interconnecting new renewable generation projects; Technology upgrades; Large load beyond initial 1.8 GWs.

ANSWER 007

We are still in the process of evaluating and identifying the specific programs to be deferred in 2027, and do not expect to be completed with our evaluation and decision-making until sometime in mid 4Q of 2026. Therefore, we have not identified specific programs that will be reduced at this time.

¹ 1PG&E Launches Strategic Review to Build a Better, More Affordable Energy Future for California Customers, PG&E Newsroom Press Release, September 2, 2026, available at: https://www.pge.com/en/newsroom/press-release_details.77a6f479-b055-45f1-bbea-0bea442774c2.html [accessed on September 4, 2026].

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The categories listed above are among the categories of work we are evaluating as part of the capital reduction.