

Docket No.: A.25-05-011

Exhibit No.: CalCCA-22

Date: October 6, 2025

Sponsor/Witness: Barry (PG&E)

EXHIBIT CALCCA-22

Excerpt from PG&E Public Rebuttal Testimony in 2025 ERRR Forecast case

Application: 24-05-009
(U 39 E)
Exhibit No.: _____
Date: September 24, 2024
Witness(es): Various

PACIFIC GAS AND ELECTRIC COMPANY

**2025 ENERGY RESOURCE RECOVERY ACCOUNT AND
GENERATION NON-BYPASSABLE CHARGES FORECAST AND
GREENHOUSE GAS FORECAST REVENUE RETURN AND
RECONCILIATION**

REBUTTAL TESTIMONY



1 Following the date of PG&E's Prepared Testimony preparation, PG&E has
2 since offered additional volumes of 2025 RECs for sale, along with other
3 applicable forecast assumption updates, and there is no longer a need to
4 categorize any volume of 2025 RECs as "Excess RPS."

5 Q 34 Why are there no longer volumes associated with what PG&E categorized
6 as "Excess RPS?"

7 A 34 Subsequent to Prepared Testimony, PG&E executed sales agreements for
8 2025 RPS energy and RECs. As a result of such sales, as well as other
9 applicable forecast assumption updates, PG&E's Fall Update will reflect a
10 forecast RPS deficiency relative to PG&E's bundled service customers
11 annual RPS imputed compliance requirement for 2025. Therefore, PG&E
12 considers the issue of whether "Excess RECs" should be retained by PG&E
13 or not as moot. Those 2025 volumes will now be sold and revenues from
14 those sales will reduce the forecast 2025 Power Charge Indifference
15 Adjustment (PCIA) revenue requirement.

16 Q 35 So, CalCCA's claim that PG&E "opted to treat Excess RPS as if it were
17 Unsold RPS, and assign it zero value in the PCIA, even though the Excess
18 RPS resulted from PG&E's own decision to not offer the available RPS
19 generation for sale in the market" is incorrect?

20 A 35 Yes. To clarify, at the time of Prepared Testimony, the RPS generation was
21 not offered for sale in the market. Since then, the volumes of forecast 2025
22 RPS generation identified as "Excess RPS" have been offered for sale and
23 were actually sold.

24 Q 36 Does PG&E's updated RPS position forecast for 2025 require the use of
25 either pre-2018 banked RECs or Unsold RECs?

26 A 36 No. To meet the forecast 2025 Minimum Retained RPS requirements,
27 PG&E anticipates using RECs generated in 2018 and 2020.

28 Q 37 Is it necessary for the Commission to determine in PG&E's 2025 ERRRA
29 Forecast whether pre-2018 banked RECs or post-2018 Unsold RECs be
30 retained first as part of the Minimum Retained RPS calculation?

31 A 37 No. That issue is not ripe for consideration in PG&E's 2025 ERRRA Forecast
32 as PG&E's updated 2025 Minimum Retained RPS entry in its Fall Update is
33 anticipated to utilize RECs generated in 2018 and 2020.