Docket No.:   A.25-05-011

Exhibit No.:   CalCCA-09

Date: October 6, 2025

Sponsor/Witness: Keller (PG&E)

EXHIBIT CALCCA-09

PG&E Response to CalCCA 5.09

PG&E Data Request No.:	CalCCA_005-Q009
PG&E File Name:	ERRA-2026-PGE-Forecast_DR_CalCCA_005-Q009
Request Date:	September 26, 2025
Requester DR No.:	005
Requesting Party:	California Community Choice Association
Requester:	Nikhil Vijaykar
Date Sent:	October 3, 2025
PG&E Witness(es):	Marcus Keller – Energy Policy and Procurement

QUESTION 009

Referring to PG&E's rebuttal testimony page 3-11, lines 12-20:

a. Confirm that under PG&E's revised weighting proposal, the percent of battery storage NQC that would be counted as Retained RA would be different for each IOU. If not confirmed, please explain.

b. Confirm that under the SCE interim methodology for calculating the value of Retained RA from storage, the percent of battery storage NQC that would be counted as Retained RA would be the same for each IOU. If not confirmed, please explain.

ANSWER 009

a. PG&E confirms that, if applied to each IOU, PG&E's methodology for retained storage would be consistent although the retained RA quantity for battery storage resources would likely be different for each IOU because the quantity retained would be a function of the optimized battery storage capacity used, which would be impacted based on each IOUs' SoD RA requirements as well as their mix of SoD RA supply resources. Depending on those components the value for a battery storage resource would likely vary between LSEs; however, the total amount of RA being retained would still equate to the LSE's specific SoD RA requirements.

b. As described in PG&E's rebuttal testimony, PG&E confirms that under the SCE interim methodology, as proposed by CalCCA in their intervenor testimony as an alternative to their primary ask to use the 'status quo' as an interim SoD methodology for this proceeding, a formula is applied that would produce a fixed percentage for a battery storage resource relative to its maximum capacity rather than the optimal quantity that the resource would deliver in any given hour. PG&E notes CalCCA recommends a different methodology for solar and wind resources that gives an equal weighting to each hour of their SoD RA supply.

Applying the equal weighting approach CalCCA recommends for wind and solar resources to 4-hour battery storage resources would produce a percentage closer to 16.7 percent rather than the approximately 80 percent of the maximum capacity based on CalCCA's proposal.[1]

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[1] PG&E Rebuttal Testimony, p. 3-11.