CPUC Docket: A.26-01-003 et al.
Exhibit Number: TURN-11
Date: November 25, 2026

A.26-01-003 et al.

Ex. TURN-11

PG&E responses to TURN DR 11, Questions 1-4

PACIFIC GAS AND ELECTRIC COMPANY
Income Qualified Programs – Program Years 2028-2033
Application 26-01-003
Data Response

PG&E Data Request No.:	TURN_011-Q001
PG&E File Name:	IQPPY28-33_DR_TURN_011-Q001
Request Date:	November 4, 2026
Requester DR No.:	011
Requesting Party:	The Utility Reform Network
Requester:	Reina L. Yanagiba
Date Sent:	November 18, 2026
PG&E Witness(es):	Jack Pilutti

SUBJECT: ENERGY SAVINGS ASSISTANCE PROGRAM – PLEASE REFER TO PG&E'S REBUTTAL TESTIMONY: ELECTRIFICATION AND BILL IMPACT ANALYSIS

QUESTION 001

Pages 4-20 and 4-21 of PG&E's rebuttal testimony state,

> "TURN's proposal to the extent that it requires IOUs to develop and use a joint tool for bill impact analysis, as IOUs should deploy the tools suited to estimate bill impacts in their service territory and that consider IOU-specific attributes such as climate and geography and rate design. Co-development of a joint tool would require re-work to integrate existing IOU tools or could result in a tool that is not purposely built for the service territory that is being analyzed. Co-development of a new bill impact tool would also introduce additional complexities, additional development and maintenance costs, and risk deployment delays."

a. Please describe the existing IOU bill impact analysis tools that PG&E is referring to.

b. Please describe what PG&E means by the term 'joint tool'.

c. Please describe what PG&E means when it states that a joint tool could 'result in a tool that is not purposely built for the service territory that is being analyzed'.

d. Please provide examples of the additional complexities that could be introduced by co-development of a new bill impact tool.

ANSWER 001

a. Please see PG&E's response to TURN006-Q015 subpart (b) for PG&E's responses describing existing and potential future bill impact analysis tools.

b. When discussing a "joint tool," PG&E is referencing a bill impact analysis tool that is required to be jointly developed with and/or commonly implemented across multiple IOU ESA programs.

c. Bill impacts analysis may rely on utility-specific rates, climate and weather assumptions, baseline allowances, interactions with non-ESA programs, and other service territory attributes that vary among IOUs. If the co-development of a joint-tool limits customization for these utility-specific factors, estimated post-treatment bill impacts could be less accurate than estimates generated by tools that are more purposely built for the service territory being analyzed.

d. Co-development of a joint tool could introduce additional complexities. For example, a joint tool may need to accommodate differing program designs, measure offerings, data inputs, and analytical requirements across multiple IOU ESA programs. In addition, development of a new joint tool would likely require coordination and cost-sharing among multiple IOUs and vendors. Such coordination could create administrative challenges, including development delays arising from differing program schedules, priorities, and implementation timelines.

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PG&E Data Request No.:	TURN_011-Q002
PG&E File Name:	IQPPY28-33_DR_TURN_011-Q002
Request Date:	November 4, 2026
Requester DR No.:	011
Requesting Party:	The Utility Reform Network
Requester:	Reina L. Yanagiba
Date Sent:	November 18, 2026
PG&E Witness(es):	Jack Pilutti

SUBJECT: ENERGY SAVINGS ASSISTANCE PROGRAM – PLEASE REFER TO PG&E'S REBUTTAL TESTIMONY: ELECTRIFICATION AND BILL IMPACT ANALYSIS

QUESTION 002

Page 4-22 of PG&E's rebuttal testimony states,

> "PG&E does not oppose the Commission adopting guidance regarding the application of estimated bill-impact analysis, provided such guidance is implemented in a manner that supports flexible program administration and customer choice. Thus, PG&E also recommends that the Commission preserve flexibility to address customer specific circumstances, including situations where projected bill impacts are subject to significant uncertainty or where a customer declines the recommended technology".

a. Please describe what PG&E means when it states that guidance should be 'implemented in a manner that supports flexible program administration and customer choice'.

b. Please describe what PG&E is recommending when it requests flexibility to address customer-specific circumstances such as where the projected bill impacts are subject to significant uncertainty.

c. Please describe what PG&E is recommending when it requests flexibility to address customer-specific circumstances such as when a customer declines the recommended technology.

ANSWER 002

a. PG&E recommends that if the Commission provides guidance regarding the application of estimated bill-impact analysis, then such guidance provide (1) flexibility for ESA programs to customize electrification measure offerings and feasibility in a manner that is consistent with PG&E's proposed transition to

electrification, and (2) provides sufficient implementation flexibility[1] including the customer circumstances detailed in subparts (b) and (c) of this question.

b. When PG&E requests flexibility to address customer-specific circumstances, PG&E means the ability to customize measure feasibility and delivery to the characteristics of a customer's household, such as estimations of post-installation bill impact. Post-treatment bill impact estimates model forecasted energy bills resulting from the fuel-substitution or switching of one or more appliances. These estimates can be subject to varying degrees of uncertainty, or confidence.[2] In cases where a customer's post-treatment bill is estimated to be lower but the uncertainty is very large, PG&E plans to allow customers to make decisions specific to their project.

c. PG&E plans to provide customers the choice of accepting the recommended electric technology or decline and accept an alternative technology if available through ESA at the time of treatment.[3]

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[1] See PG&E's Rebuttal Testimony, Exhibit (PG&E-04), p. 4-21 at line 24 to p. 4-22 at line 2.

[2] The Commission has acknowledged in other recent proceedings that post-installation bill impacts are estimated and subject to uncertainty.
D.26-07-030, p. 76, Findings of Fact 24

[3] For PG&E's proposed ESA electrification offerings, including its proposals to transition ESA away from natural gas to electric-only measures, please see Exhibit [PG&E-01E], pp. 4-37 to 4-54.

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PG&E Witness(es):	Jack Pilutti

SUBJECT: ENERGY SAVINGS ASSISTANCE PROGRAM – PLEASE REFER TO PG&E'S REBUTTAL TESTIMONY: ELECTRIFICATION AND BILL IMPACT ANALYSIS

QUESTION 003

In PG&E's experience, how often do customers choose to remain on fossil fuels when electrification is the more affordable option?

ANSWER 003

PG&E objects to this request on the grounds that it is vague and ambiguous as to which customers are being referred to in "how often do customers choose to remain on fossil fuels when electrification is the more affordable option" as well as how "the more affordable option" is defined. Subject to that objection and without waiving its right to object to the use of its response in this proceeding, PG&E responds as follows:

For this purpose of this data request, PG&E responds with respect to how often ESA-eligible customers choose to remain on fossil fuels when electrification is the "more affordable option."

PG&E does not have data or available information that can reliably predict how often the general ESA-eligible customer population chooses to remain on fossil fuels when electrification is the more affordable option. In addition, PG&E notes that because post-treatment bill analyses are estimated, PG&E is unable to determine whether electrification is truly the more affordable option prior to treatment.[1]

[1] The Commission has acknowledged in other recent proceedings that post-installation bill impacts are estimated and subject to uncertainty.
D.26-07-030, p. 76, Findings of Fact 24

PACIFIC GAS AND ELECTRIC COMPANY
Income Qualified Programs – Program Years 2028-2033
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PG&E Data Request No.:	TURN_011-Q004
PG&E File Name:	IQPPY28-33_DR_TURN_011-Q004
Request Date:	November 4, 2026
Requester DR No.:	011
Requesting Party:	The Utility Reform Network
Requester:	Reina L. Yanagiba
Date Sent:	November 18, 2026
PG&E Witness(es):	Tina Thuong Nguyen

SUBJECT: ENERGY SAVINGS ASSISTANCE PROGRAM – PLEASE REFER TO PG&E'S REBUTTAL TESTIMONY: FUND SHIFTING AND UNSPENT FUNDS

QUESTION 004

Page 4-31 of PG&E's rebuttal testimony states,

> "PG&E disagrees that all unspent funds should automatically be used to offset collections in the following year. TURN's proposal does not adequately account for the operational flexibility necessary to manage a multi-year portfolio and achieve adopted program goals and targets. Limiting the use of unspent funds to annual collection offsets could reduce the program's ability to respond to changing participation levels, implementation needs, and cost fluctuations over the course of the cycle."

a. Please provide a list of the instances when PG&E needed higher ESA portfolio budgets in a plan year than what was initially approved. Please describe the causes of each of these instances.

b. Please identify which of these instances required an increase in the ESA portfolio budget in excess of 10 percent of future year budgets.

ANSWER 004

For the purpose of this response, PG&E interprets "ESA portfolio budget" as the cumulative budget for the entire ESA portfolio (for example the portfolio includes multiple programs such as ESA Main, MFWB, Pilots, etc.).

a. PG&E did not need higher ESA portfolio budgets in a plan year than what was initially approved during program years 2021-2025.

   PG&E notes that while the portfolio budget was not exceeded during 2021-2025 program years, program-level budgets such as PG&E's Pilot Plus, Pilot Deep (PP/PD) program had higher expenses than annually authorized in 2021, 2024 and

2025. For these years, PP/PD borrowed funds from 2022 into 2021 and carried forward unspent funds from 2022-2023 to 2024 and 2025 in compliance with the fund shifting rules authorized in D.21-06-015.[1]

b. There were no instances during program years 2021-2025 that required an increase in the ESA portfolio budget in excess of 10 percent of future year budgets.

[1] PG&E also anticipates that the 2026 PP/PD budget will exceed that which was annually authorized.