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Commissioner	:	<u>M. Baker</u>
Admin. Law Judge	:	<u>L. Goldberg</u>
Public Advocates Office	:	<u>S. Cornett</u>
Project Mgr.		
Public Advocates Office	:	<u>Various</u>
Witnesses		



**PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION**

**PREPARED TESTIMONY
ON
APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY
(U 39 E) FOR COMPLIANCE REVIEW OF UTILITY OWNED
GENERATION OPERATIONS, PORTFOLIO ALLOCATION
BALANCING ACCOUNT ENTRIES, ENERGY RESOURCE
RECOVERY ACCOUNT ENTRIES,
CONTRACT ADMINISTRATION, ECONOMIC DISPATCH OF
ELECTRIC RESOURCES, UTILITY OWNED GENERATION
FUEL PROCUREMENT, AND OTHER ACTIVITIES FOR THE
PERIOD JANUARY 1 THROUGH DECEMBER 31, 2025**

PUBLIC VERSION

San Francisco, California
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1 **CHAPTER 1: EXECUTIVE SUMMARY**

2 (Witness: Sarah Cornett)

3 **I. INTRODUCTION AND RECOMMENDATIONS**

4 This testimony presents the Public Advocates Office’s (Cal Advocates) review of
5 Pacific Gas and Electric Company’s (PG&E) Energy Resource Recovery Account
6 (ERRA) Compliance Application for the period from January 1, 2025, through December
7 31, 2025 (Record Period). PG&E filed its annual ERRA compliance application pursuant
8 to Decision (D.) 02-10-062. In that Decision, the California Public Utilities Commission
9 (Commission or CPUC) required certain utility procurement activities to be reviewed
10 annually in the ERRA proceeding.

11 Pursuant to D.02-10-062, D.02-12-074, and California Public Utilities Code
12 (Pub. Util. Code) § 454.5(d)(3), the purpose of the ERRA is to record and recover power
13 costs and ensure timely recovery of procurement costs incurred related to an investor-
14 owned utility’s (IOU) approved procurement plan.¹ Pub. Util. Code § 454.5(d)(3) allows
15 the Commission to establish balancing accounts to track the differences between recorded
16 revenues and costs incurred related to the approved procurement plan.²

17 PG&E filed its ERRA compliance application on February 27, 2026, requesting
18 Commission approval for costs associated with activities that occurred during the 2025
19 Record Period. The scope of Cal Advocates’ review of PG&E’s application includes a
20 review of least-cost dispatch (LCD), demand response, contract administration, as well as
21 an audit of balancing and memorandum account entries and resource adequacy (RA). In
22 addition, Cal Advocates reviewed PG&E’s greenhouse gas compliance instrument
23 procurement, which is summarized below.

¹ Decision (D.) 02-10-062, *Final Decision on Procurement OIR*, October 25, 2002, Finding of Fact (FOF) 23 and 26, at 71, 71 – 72; issued in Rulemaking (R.) 01-10-024.

² Pub. Util. Code §454.5(d)(3) states: “The commission shall establish power procurement balancing accounts to track the differences between recorded revenues and costs incurred pursuant to an approved procurement plan. The commission shall review the power procurement balancing accounts, not less than semiannually, and shall adjust rates or order refunds, as necessary, to promptly amortize a balancing account, according to a schedule determined by the commission.”

1 In this testimony Cal Advocates presents its analyses and recommendations
2 associated with PG&E's request. This testimony focuses exclusively on the 2025 Record
3 Period and is based on analysis of information submitted by PG&E that includes, but is
4 not limited to, PG&E's testimony and workpapers submitted with its application and
5 responses to data requests.

6 The issues that Cal Advocates reviewed for the 2025 Record Period are listed in
7 the table below and summarized in this chapter. Cal Advocates will consider Utility
8 Owned Generation issues in its testimony on PG&E's ERRRA Compliance for the 2026
9 Record Period or a later date. The timeline of the outage at PG&E's Elkhorn Battery
10 Energy Storage System is such that Cal Advocates is unable to provide analysis at this
11 time, but Cal Advocates will consider the reasonableness of costs and replacement power
12 pending the outcome of the Root Cause Analysis.

13 The Commission requires the utilities to record and demonstrate greenhouse gas
14 (GHG) Cap-and-Trade compliance with methodologies per D.21-05-004. During Record
15 Period 2025, PG&E recorded [REDACTED] worth of GHG compliance costs from utility-
16 owned generation (UOG) to its balancing accounts.³ During Record Period 2025, PG&E
17 testifies that it did not have any tolling agreements in effect with contractual emissions,
18 so therefore PG&E [REDACTED]
19 [REDACTED].⁴ Cal Advocates reviewed PG&E's workpapers reporting these costs and
20 demonstrating its calculations in compliance with the methodologies, but is not serving a
21 separate testimony chapter on GHG compliance. PG&E appears to have accurately
22 recorded and demonstrated its Record Period 2025 GHG compliance costs in accordance
23 with Commission requirements.

24 For those issues or topic areas for which no testimony is filed, Cal Advocates does
25 not have recommendations or disallowances. The qualifications of Cal Advocates'
26 witnesses and their testimony declarations are contained in Appendix A of this report.

³ PG&E Testimony, Ch. 7, Greenhouse Gas Compliance, Instrument Procurement, Table 7-2 at 7-8.

⁴ PG&E Testimony, Ch. 7, Greenhouse Gas Compliance, Instrument Procurement at 7-5, lines 27-29.

List of the Cal Advocates Witnesses and Respective Chapters

Chapter #	Description	Witness(es)
1	Executive Summary	Sarah Cornett
2	Least-Cost Dispatch and Economically-Triggered Demand Response	Craig Jenquin
3	Contract Administration	Jessica Zhang
4	Review of Balancing and Memorandum Accounts	Brian Lui Craig Jenquin
5	Resource Adequacy	Karl Dunkle Werner
N/A	Greenhouse Gas Compliance Instrument Procurement ⁵	Thomas Gariffo

The following summary provides an overview of each chapter presented and sponsored by the witnesses for the 2025 Record Period. This summary is provided strictly for the reader's convenience.

1. Executive Summary (Sarah Cornett)

2. Least-Cost Dispatch And Economically Triggered Demand Response (Craig Jenquin)

Cal Advocates finds that PG&E managed its thermal, hydro, storage, renewable, and demand response resources reasonably and does not recommend any disallowances.

3. Contract Administration (Jessica Zhang)

Cal Advocates does not contest PG&E's contract administration activities during the 2025 Record Period.

⁵ Cal Advocates reviewed PG&E's workpapers reporting its costs and demonstrating its calculations in compliance with the methodologies, but is not filing a separate testimony chapter on GHG compliance.

1 **4. Review of Balancing and Memorandum Accounts (Brian Lui,**
2 **Craig Jenquin)**

3 Cal Advocates does not contest PG&E's balancing and
4 memorandum accounting activities during the 2025 Record Period.

5 **5. Resource Adequacy (Karl Dunkle Werner)**

6 Cal Advocates recommends the Commission clarify that PG&E is
7 expected to complete the sale of the RA volumes it is authorized to
8 sell under its BPP, at least in peak months.

9 **6. Greenhouse Gas Compliance Instrument Procurement (Thomas**
10 **Gariffo)**

11 PG&E appears to have accurately recorded and demonstrated its Record
12 Period 2025 GHG compliance costs in accordance with Commission
13 requirements.

1 **CHAPTER 2: LEAST-COST DISPATCH AND ECONOMICALLY-TRIGGERED**
2 **DEMAND RESPONSE**

3 (Witness: Craig Jenquin)

4 **I. INTRODUCTION AND SUMMARY**

5 This chapter of testimony reviews Pacific Gas and Electric Company's (PG&E)
6 dispatch and demand response⁶ activities for the Record Period from January 1, 2025,
7 through December 31, 2025, and considers whether PG&E met the Commission's least-
8 cost dispatch standard. The Public Advocates Office of the California Public Utilities
9 Commission (Cal Advocates) examined Chapter 1 of PG&E's 2025 Energy Resource
10 Recovery Account (ERRA) compliance testimony and workpapers and reviewed past
11 ERRA testimony. Both PG&E's energy scheduling and demand response dispatch
12 decisions were reviewed using the least-cost dispatch standard of review, as described
13 below.

14 **II. FINDINGS AND RECOMMENDATIONS**

15 **A. Price Forecasting Accuracy**

16 Overall, PG&E's day-ahead price forecasts during Record Period 2025 were on
17 average [REDACTED] than in 2024. Price forecasts for the 100 highest energy value days
18 in 2025 were [REDACTED] than in 2024. Cal Advocates does not object to
19 PG&E's price forecasting activities in the 2025 Record Period.

20 **B. Load Forecasting Accuracy**

21 The proportion of load cleared in the real-time market (RTM) in Record Period
22 2025 was [REDACTED] than in the 2024 Record Period. In recent years,
23 PG&E's annual load [REDACTED] and total RTM load [REDACTED]
24 [REDACTED]. In 2025, total RTM cleared load was [REDACTED] of net day-ahead
25 market (DAM) cleared load, indicating that the majority of energy procured from the

⁶ PG&E manages several types of Demand Response programs, but the LCD chapter, and therefore the Public Advocates Office's analysis, focuses on demand response resources with economic dispatch triggers.

1 California Independent System Operator (CAISO) was settled in the DAM. Cal
2 Advocates does not object to PG&E's load bidding calculations.

3 **C. Assessment of Management of Thermal Resources**

4 In the 2025 Record Period, PG&E submitted [REDACTED] day-ahead hourly bids to the
5 CAISO for its thermal resources. The rate of non-awards and errors in bidding activity
6 were similar in 2025 as in prior record years and resulted in minimal cost. Cal Advocates
7 does not object to PG&E's bid cost calculation activities.

8 **D. Assessment of Management of Hydroelectric Resources**

9 PG&E has demonstrated that it bids its hydro resources for dispatch during times
10 when the price and value of energy is high according to least-cost dispatch principles.

11 **E. Assessment of Management of Energy Storage and Renewable**
12 **Resources**

13 As noted in Cal Advocates' testimonies served in prior Record Periods, there are
14 currently no Commission-directed reporting guidelines for energy storage dispatch. Cal
15 Advocates will review for compliance once reporting requirements for energy storage
16 dispatch are established.

17 **F. Assessment of Management of Demand Response Programs**

18 Based on the average hourly price at the Sub-Load Aggregation Point (Sub-LAP)
19 and forecasted temperature data for instances in which a Capacity Bidding Program
20 (CBP), SmartAC, or Automated Response Technology (ART) resource was dispatched
21 versus the average hourly Sub-LAP price for all instances wherein the trigger condition
22 was met, Cal Advocates does not object to PG&E's bidding and scheduling of CBP,
23 SmartAC, and ART resources. Cal Advocates recommends that PG&E consider
24 developing economic dispatch triggers for its ART programs in addition to temperature
25 triggers.

1 **III. BACKGROUND**

2 **A. Standard of Conduct for Least-Cost Dispatch and Demand** 3 **Response**

4 The Commission’s Decision (D.) 02-10-062 instituted rules for the utilities’
5 procurement responsibilities, established ERRA as the cost recovery mechanism for
6 short-term procurement costs, and set minimum standards of behavior.⁷ A subsequent
7 decision, D.02-12-074, described the utilities’ “up-front standard”⁸ of least-cost dispatch
8 as a guide for their short-term procurement plans as well as for the Commission to
9 determine compliance. The decision elaborated upon Standard of Conduct #4:

10 Least-cost dispatch refers to a situation in which the most cost-effective
11 mix of total resources is used, thereby minimizing the cost of delivering
12 electric services...[P]ure economic dispatch of resources may need to be
13 constrained to satisfy operational, physical, legal, regulatory,
14 environmental, and safety considerations. The utility bears the burden of
15 proving compliance with the standard set forth in its plan.⁹

16 In the settlement agreement resulting from PG&E’s 2014 Record Period ERRA
17 Compliance proceeding, Cal Advocates,¹⁰ and PG&E agreed that the Commission would
18 review economically dispatched demand response programs and hold PG&E to the least-
19 cost dispatch standard of review described above.¹¹

20 **B. Clarification of Least-Cost Dispatch Expectations Following** 21 **PG&E’s 2010 Record Period and Southern California Edison’s** 22 **2012 Record Period ERRA Compliance Proceedings**

23 Cal Advocates’ analysis of each investor-owned utility’s (IOU’s) ERRA 2010
24 Record Period least-cost dispatch testimony concluded that the utilities did not achieve
25 least-cost dispatch and recommended disallowances for each utility. The Commission

⁷ D.02-10-062 at 2.

⁸ D.02-12-074 at 54.

⁹ D.02-12-074 at 54.

¹⁰ The Office of Ratepayer Advocates was renamed the Public Advocates Office of the Public Utilities Commission Pursuant to Senate Bill No. 854, which was signed by the Governor on June 27, 2019 (Chapter 51, Statutes of 2019).

¹¹ D.16-12-045, Conclusion of Law 4 at 31.

1 reviewed PG&E’s least-cost dispatch showing in Application (A.) 11-02-011 and issued
2 D.13-10-041, stating that while the Commission would not approve the disallowance
3 recommendation, the showing was below expectations.¹² The decision served to
4 “ameliorate these shortcomings and provide specific direction to PG&E to improve its
5 showings in the future.”¹³

6 To improve least-cost dispatch showings, the decision directed PG&E to include
7 “precise numerical calculations that either demonstrate that PG&E achieved least-cost
8 dispatch during the Record Period or quantify the amount of overspending by PG&E” in
9 its 2014 ERRA compliance proceeding (and going forward).¹⁴ Additionally, the decision
10 directed the Commission’s Energy Division to facilitate a workshop with all IOUs
11 wherein a set of proposed criteria would be developed for determining what constitutes
12 least-cost dispatch compliance and the methodology required to demonstrate this
13 compliance.¹⁵

14 Finally, in response to Southern California Edison’s (SCE) 2012 Record Period
15 ERRA reporting, Cal Advocates asserted that the utility did not provide adequate proof
16 that it achieved least-cost dispatch.¹⁶ The Commission further clarified least-cost
17 dispatch responsibilities by issuing D.14-05-023 which established that, following the
18 Market Redesign Technology Update in 2009, the CAISO is responsible for dispatching
19 energy generation.¹⁷ In other words, the regulated utilities are responsible for scheduling
20 and bidding, but the actual dispatch is performed by the CAISO.

¹² D.13-10-041 at 14-15.

¹³ D.13-10-041 at 15.

¹⁴ D.13-10-041 at 43.

¹⁵ D.13-10-041 at 25.

¹⁶ D.14-05-023 at 9.

¹⁷ D.14-05-023 at 19.

1 **C. Joint Proposal, Interim Ruling, and Final Decision for**
2 **A.11-02-011**

3 After the workshops, the utilities and subject matter experts proposed least-cost
4 dispatch criteria and methodologies and submitted them to the Commission in 2014 as
5 the “Joint Proposal for the Demonstration of Least-Cost Dispatch” (Joint Proposal).¹⁸
6 Cal Advocates reviewed the proposal and provided recommendations, but the utilities and
7 Cal Advocates disagreed on the format for reporting their demand response programs in
8 ERRA compliance applications.¹⁹

9 The Commission issued the “Interim Ruling Providing Guidance for 2014 ERRA
10 Compliance Proceedings,” (Interim Ruling) directing the utilities to comply with the
11 uncontested portions of the Joint Proposal, which are as follows:

- 12 a. The least-cost dispatch Proposal shall be modified to include
13 a background summary table in testimony.
- 14 b. The utilities shall use the 500 instead of 100 highest hourly
15 Locational Marginal Prices in metric 4 of the Joint Proposal.
- 16 c. The summary reporting of daily self-commitment decisions
17 shall be modified to show both “profit positions” and “loss
18 positions.”
- 19 d. The utilities shall include a comparison of the accuracy of the
20 utilities’ forecast of prices in the day-ahead market compared
21 to actual CAISO results.²⁰

22 Finally, the Commission’s Interim Ruling addressed the dispute between Cal
23 Advocates and the utilities by ordering that the utilities show the “metrics for demand
24 response” in the format proposed by Cal Advocates in its response to the Joint Proposal.²¹
25 The Commission’s Decision affirming the guidance and direction in the Interim Ruling²²

¹⁸ D.15-05-006 at 7.

¹⁹ D.15-05-006 at 7-11.

²⁰ D.15-05-006 at 12.

²¹ D.15-05-006 at 12.

²² D.15-05-006 at 13-14.

1 was issued on May 7, 2015, and the standards were expanded to apply to all three utilities
2 on December 3, 2015.²³

3 **IV. DISCUSSION AND ANALYSIS**

4 **A. Price Forecasting Accuracy**

5 **1. Overview**

6 PG&E conducts load and price forecasts to support its day-ahead market bidding
7 and to procure fuel to supply its thermal resources. PG&E uses an hourly next-day price
8 forecast and a long-term price forecast to inform bidding and scheduling in the DAM.

9 The short-term price forecast is used to generate load bid and for daily resource
10 optimization, and the longer-term price forecast is used for resources with potential
11 opportunity costs beyond the next day,²⁴ such as hydroelectric generators. In 2025,
12 PG&E generated its short-term price forecast using a neural network-based forecast
13 model provided by Enverus. PG&E's longer-term price forecast was produced internally
14 by PG&E's Market & Credit and Risk Management Department.²⁵

15 A common metric used to evaluate the relative quality of forecasts in the utility
16 industry is Mean Absolute Percentage Error (MAPE), which measures the magnitude of
17 errors proportional to the magnitude of the target value. MAPE is a biased estimator that
18 provides higher error values for underestimates and can grow unreasonably large in hours
19 when forecasted volumes are small; however, MAPE still provides a useful and easily
20 interpreted approximation of forecast accuracy. To prevent outliers from distorting
21 summary statistics, Cal Advocates adjusted the MAPE value of all hours exceeding 100%
22 to equal 100% prior to calculating MAPE averages across multiple days or hours.²⁶

²³ D.15-12-015.

²⁴ A.26-02-019, PG&E Testimony at 1-14.

²⁵ A.26-02-019, PG&E Testimony at 1-14.

²⁶ Cal Advocates only applies this adjustment in its own workpapers. PG&E's submitted workpapers may include calculations without this adjustment and may result in values different from those estimated by Cal Advocates.

2. Analysis

PG&E's day-ahead forecast accuracy can be estimated by comparing the load and price forecasts with the actual CAISO load and clearing price to get the MAPE, which is a measure of the forecast price deviation from the actual clearing price. This information is provided in PG&E's testimony in its comparison of forecast and actual price and load for the 100 highest energy value days (ranked based on the total cost of the load cleared in the day-ahead market), as well as for every day of the Record Period.²⁷ In addition to verifying forecast accuracy, the MAPE analysis provides insight into how well PG&E values its dispatchable resources to ensure that they are bid economically, consistent with least-cost dispatch principles.

PG&E had an average daily price MAPE of [REDACTED] in the 100 highest energy value (HEV) days of the 2025 Record Period with a median of [REDACTED].²⁸ These average values were [REDACTED] than the 2024 Record Period average of [REDACTED] and median of [REDACTED].²⁹

The mean and median price MAPE values for all 365 days of the year are [REDACTED] the average MAPE values for the 100 HEV days in 2025.³⁰ This indicates that PG&E forecasts accurately at times in the Record Period when CAISO prices and CAISO trade volumes are high and have the greatest impact to ratepayers. In 2024, MAPE statistics for all 365 days of the Record Period were [REDACTED] [REDACTED] than those for the 100 highest energy value days.³¹ In 2025, PG&E [REDACTED]

²⁷ A.26-02-019, Chapter 1 Workpapers, "LCD_2025_Workpaper_6_HighestEnergyValueDays_CONF.xlsx"

²⁸ A.26-02-019, PG&E Chapter 1 Workpapers, "2025_LCD_Workpaper_6_HighestEnergyValueDays_CONF.xlsx", Table 6.1.

²⁹ A.25-02-013, Chapter 1 Workpapers, "2024_LCD_6_Highest_Energy_Value_Days_and_Price_Forecast_Summary_CONF.xlsx", Table 6.1.

³⁰ A.26-02-019, Chapter 1 Workpapers, "LCD_2025_Workpaper_6_HighestEnergyValueDays_CONF.xlsx", Table 6.1 and 6.2.

³¹ A.25-02-013, Chapter 1 Workpapers, "2024_LCD_6_Highest_Energy_Value_Days_and_Price_Forecast_Summary_CONF.xlsx", Table 6.1 and 6.2.

1 [REDACTED] on high-hour energy days. Table 2-1 indicates that
2 in 2025, daily price forecasts were [REDACTED] in the top 100
3 HEV days than in previous years, in addition to [REDACTED]
4 [REDACTED] throughout the Record Period.

5 ***Table 2-1: Mean and Median Price MAPE Values for 2022- 2025***
6 ***(Confidential)***³²

		2022	2023	2024	2025
Top 100 Energy Value Days	Average MAPE	[REDACTED]			
	Median MAPE				
All Days in the Record Period	Average MAPE				
	Median MAPE				

³² LCD_2025_Workpaper_6_HighestEnergyValueDays_CONF, A.25-02-013 Cal Advocates Testimony at 1-8.

Figure 2-1: Average Forecasted DAM Default Load Aggregation Point (DLAP) Price and Cleared CAISO DAM DLAP Price with MAPE Values for 2025 (Confidential)³³

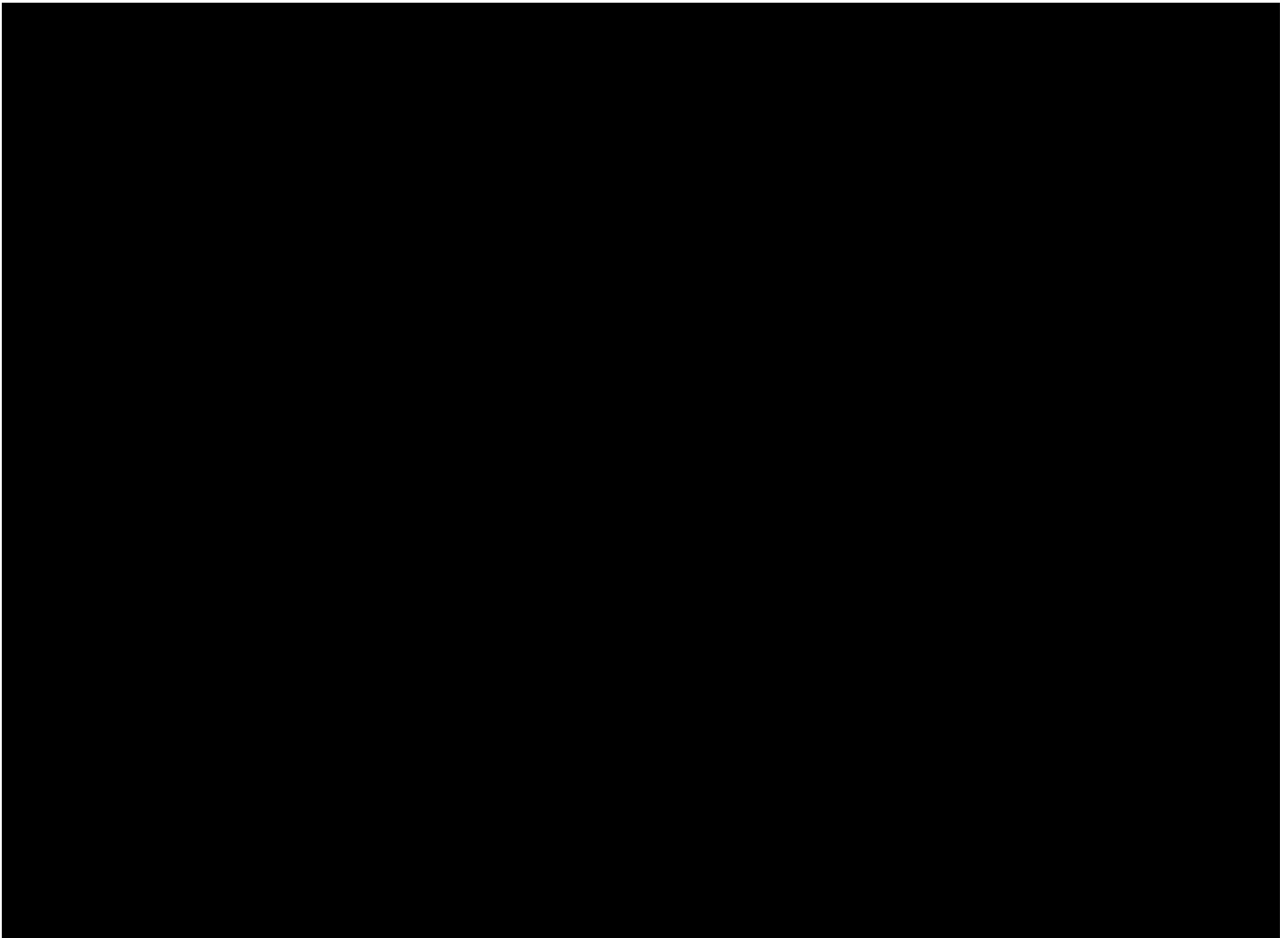


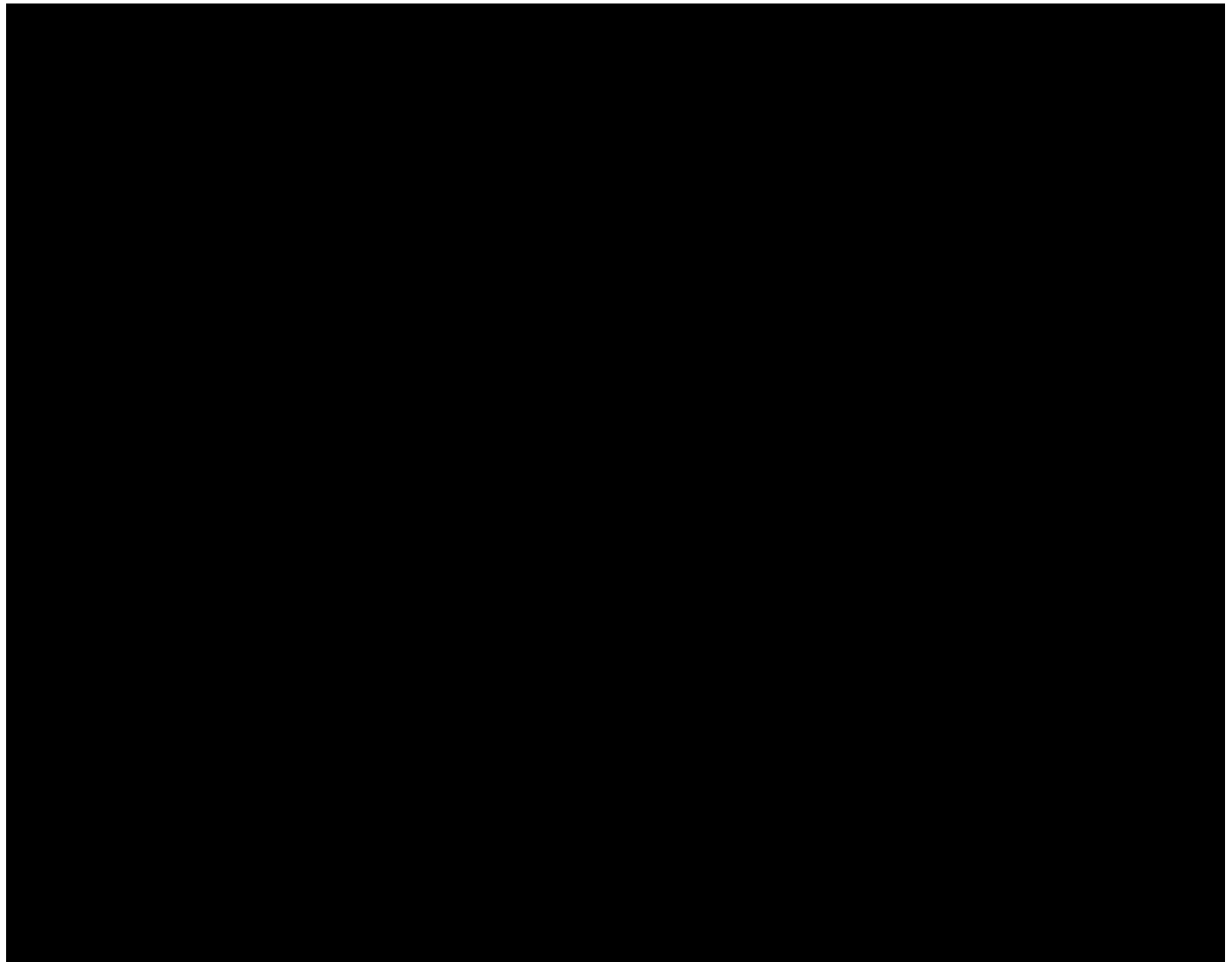
Figure 2-1 shows that PG&E's average daily price forecasts (in blue) in the 2025 Record Period were roughly aligned with the actual clearing price (in orange). Average daily MAPE (in green) [REDACTED] out of 365 in the Record Period [REDACTED] and [REDACTED] out of the 100 highest energy value days. Figure 2-1 shows that, overall, average [REDACTED] [REDACTED] MAPE spikes in [REDACTED] and [REDACTED]

³³ Cal Advocates Attachment 1.1, tab [Chart; Fcst v. Actl \$ (Daily)].

1 [REDACTED] despite only minor impacts
2 on net cost. Cal Advocates does not object to PG&E's daily price forecasting activities
3 for the 2025 Record Period, given that overall price forecast errors were low. [REDACTED]

4 [REDACTED]
5 [REDACTED], and the [REDACTED]
6 [REDACTED].

7 *Figure 2-2: Average Forecasted Hourly DAM DLAP Price and Cleared Hourly*
8 *ISO DAM DLAP Price for 2025 (Confidential)*³⁵



9
³⁴ See p. 11.

³⁵ Cal Advocates Attachment 2.1, tab [Chart; Fcst v. Actl Price (hourly)].

Figure 2-2 shows the difference between PG&E's hourly price forecast and the cleared hourly price. Light green indicates alignment between forecasted and actual hourly prices, while blue and yellow indicate periods of forecasting error. Figure 2-2 shows that PG&E forecasts are [REDACTED], but also indicates [REDACTED]. This period of [REDACTED] also corresponds with periods of [REDACTED].³⁶ However, in 2025 average prices [REDACTED] were [REDACTED] than other times in the Record Period, and analysis of PG&E's price forecasts in prior years indicates that [REDACTED] DAM clearing price from [REDACTED]. Cal Advocates does not object to PG&E's hourly price forecasting activities for the 2025 Record Period.

3. Summary and Recommendations

PG&E's day-ahead forecasts for every day of the year during Record Period 2025 were [REDACTED] than those [REDACTED] and [REDACTED] than those [REDACTED]. PG&E's day-ahead forecasts in the top 100 energy value days in the 2025 Record Period were [REDACTED] than those in [REDACTED]. PG&E's daily and hourly price forecasts [REDACTED] e [REDACTED] actual DAM clearing prices, [REDACTED]. Cal Advocates does not object to PG&E's price forecasting activities for the 2025 Record Period.

B. Load Forecasting Accuracy

1. Background

The accuracy of PG&E's load forecast influences the net cost of serving customer load. PG&E submits hourly day-ahead (DA) load bids to the CAISO to obtain the power needed to serve PG&E's forecast bundled customer demand. Load bids include both a

³⁶ See Section 3.(b.).ii, *Load Forecasting Accuracy: Analysis*, and Cal Advocates Attachment 1.2.

1 price and a volume, and CAISO awards LSEs the specified volume of DA energy when
2 the CAISO DA clearing price reaches the submitted bid price. Energy awarded to PG&E
3 by CAISO in the DA market based on PG&E's load bids is termed "DA cleared load."

4 [REDACTED]

5 [REDACTED]³⁷ [REDACTED]

6 [REDACTED]

7 [REDACTED]³⁸ When Real-Time (RT) customer load is greater than DA cleared load, the
8 unmet RT load is served by the CAISO real-time market (RTM) and settled at the RT
9 clearing price. PG&E is credited at the RTM price for DA cleared load in excess of
10 PG&E's RT load.³⁹ Depending on the relationship between DA and RT prices, error in
11 load forecasts can result in increased costs to bundled customers.

12 In 2025, PG&E's Short-Term Electric Supply team completed a comprehensive
13 modernization of PG&E's load forecast and adjustment methodologies.⁴⁰ PG&E refined
14 adjustment methodologies for transmission losses, municipal load, and Direct
15 Access/Community Choice Aggregation participation while transitioning to a direct
16 forecast model of bundled load using metered data and explanatory variables. PG&E
17 updated its methodology following the results of a competitive Request for Proposals in
18 2024 which emphasized accuracy, reliability, and integration with CAISO operations.⁴¹
19 PG&E's assessment of the vendor Amperon's proposed forecast approach estimates
20 potential cost savings [REDACTED], sizable
21 reductions in absolute forecast error, and marked improvement in MAPE. PG&E
22 transitioned to using Amperon as its primary bundled load forecast vendor in December
23 2025.

³⁷ A.26-02-019, PG&E Testimony at 1-15.

³⁸ A.24-04-012, PG&E's Confidential response to Cal Advocates DR 07 Q02.(c).(iii).

³⁹ A.24-04-012, PG&E's Confidential response to Cal Advocates DR 07 Q02.(d).

⁴⁰ A.26-02-019, PG&E Testimony at 1-12.

⁴¹ A.26-02-019, PG&E Testimony at 1-12.

2. Analysis

Cal Advocates analyzed the difference and percentage error (MAPE) between load awarded to PG&E in the DAM and the actual real-time load required by PG&E customers. Cal Advocates analyzed these values at the annual, monthly, daily, and hourly resolution. PG&E routinely provides annual and monthly net load data in its LCD workpapers submitted with its ERRA Compliance testimony.⁴² Cal Advocates calculated all values for the net cost of energy in the DAM and RTM based on PG&E's reported trade volumes and the clearing price in each market.

PG&E's load summary shows the total number of megawatt-hours (MWh) cleared each month in the day-ahead market and actual settled load. The difference indicates the amount of load scheduled in real-time. LSEs that procured more energy in the DAM than required in real-time are typically able to sell excess hourly energy back into the RTM at the RTM price. A high proportion of load cleared in the day-ahead market indicates that PG&E forecasted and procured sufficient energy resources relative to consumer demand, appropriately calculated the value of its resources, and translated these values into bids that would allow the resources to be economically dispatched.

To aid in estimating error rates and cost impacts of PG&E's load forecasts, Cal Advocates developed two hypothetical scenarios to serve as comparisons to PG&E's actual hourly energy procurements. The "ideal load" scenario assumes that PG&E can perfectly forecast its actual hourly RT load. Cal Advocates calculated the hourly cost of energy in the ideal load scenario by applying the hourly DA market price to PG&E's hourly real-time load. The "perfect forecast" scenario assumes that PG&E can perfectly forecast *both* its hourly RT load and the optimal clearing price in each hour. Cal Advocates calculated the hourly cost of energy in the perfect forecast scenario by applying the minimum of hourly DA and RT prices to PG&E's hourly RT load.⁴³

⁴² A.26-02-019, PG&E response to Cal Advocates MDR 1.3.17 (Q062).

⁴³ The hourly values of the "perfect" scenario are capped below using the lowest net hourly energy observed in the Record Period.

1 Cal Advocates acknowledges that executing the “perfect forecast” and “ideal load”
2 scenarios would require flawless knowledge of market clearing prices and/or real-time
3 load, which is unrealistic to achieve. Cal Advocates uses these alternative scenarios to
4 indicate the maximum possible cost savings associated with improvements to price and
5 load forecasting. Comparison to the perfect and ideal load scenarios aid in the
6 identification of patterns in forecast errors that may be predictable and corrected to
7 benefit ratepayers. In its analysis, Cal Advocates primarily compares the performance of
8 PG&E’s actual load forecast to the ideal load scenario because the ideal scenario relies
9 only on improved load forecasting and does not involve additional knowledge of DA and
10 RT clearing prices.

11 Based on PG&E’s data, [REDACTED] of PG&E’s total annual load was cleared in the
12 day-ahead market, and each month between [REDACTED] cleared in the RTM.⁴⁴ [REDACTED]
13 [REDACTED]
14 [REDACTED]. The proportion of load cleared in the RTM
15 in the 2025 Record Period is [REDACTED] than the net amount cleared in the 2024
16 Record Period. [REDACTED] cleared in the record period indicates PG&E,
17 on average, [REDACTED]
18 [REDACTED] indicates that, on average, PG&E [REDACTED]
19 [REDACTED] Table 2-2 shows the net energy volumes cleared in each market in 2025.
20

⁴⁴ A.26-02-019, PG&E Chapter 1 Workpapers, “2025 LCD_Workpaper_7_Load_Bid_CONF.xlsx”.

Table 2-2: Net DA and RT Cleared Load Volumes in the Record Period
(In millions)

	2025 ⁴⁵	2024 ⁴⁶	2023 ⁴⁷
Net Load Cleared in the DAM (MWh)			
Net Load Cleared in the RTM (MWh)			
Total RTM Cleared Load (MWh) ⁴⁸			

Figure 2-3 below compares PG&E’s total load cleared in the day-ahead market versus load cleared in the real-time market from 2017-2025.

⁴⁵ A.26-02-019, PG&E Confidential Workpapers, “2025 LCD_Workpaper_7_Load_Bid_CONF.xlsx”
⁴⁶ A.25-02-013 PG&E Confidential Workpapers, “2024 LCD_Workpaper_7_Load_Bid_CONF.xlsx”
⁴⁷ A.24-02-012, PG&E Confidential Workpapers, “2023 LCD_Workpaper_7_Load_Bid_CONF.xlsx”
⁴⁸ This metric shows total RTM amounts regardless of whether load was over- or under-forecasted. See Cal Advocates Attachment 1.2, tab [2025 Hourly Load], columns AJ-AL

*Figure 2-3: Percent of Load Cleared in the Real-Time market from 2017-2025
(Confidential)⁴⁹*

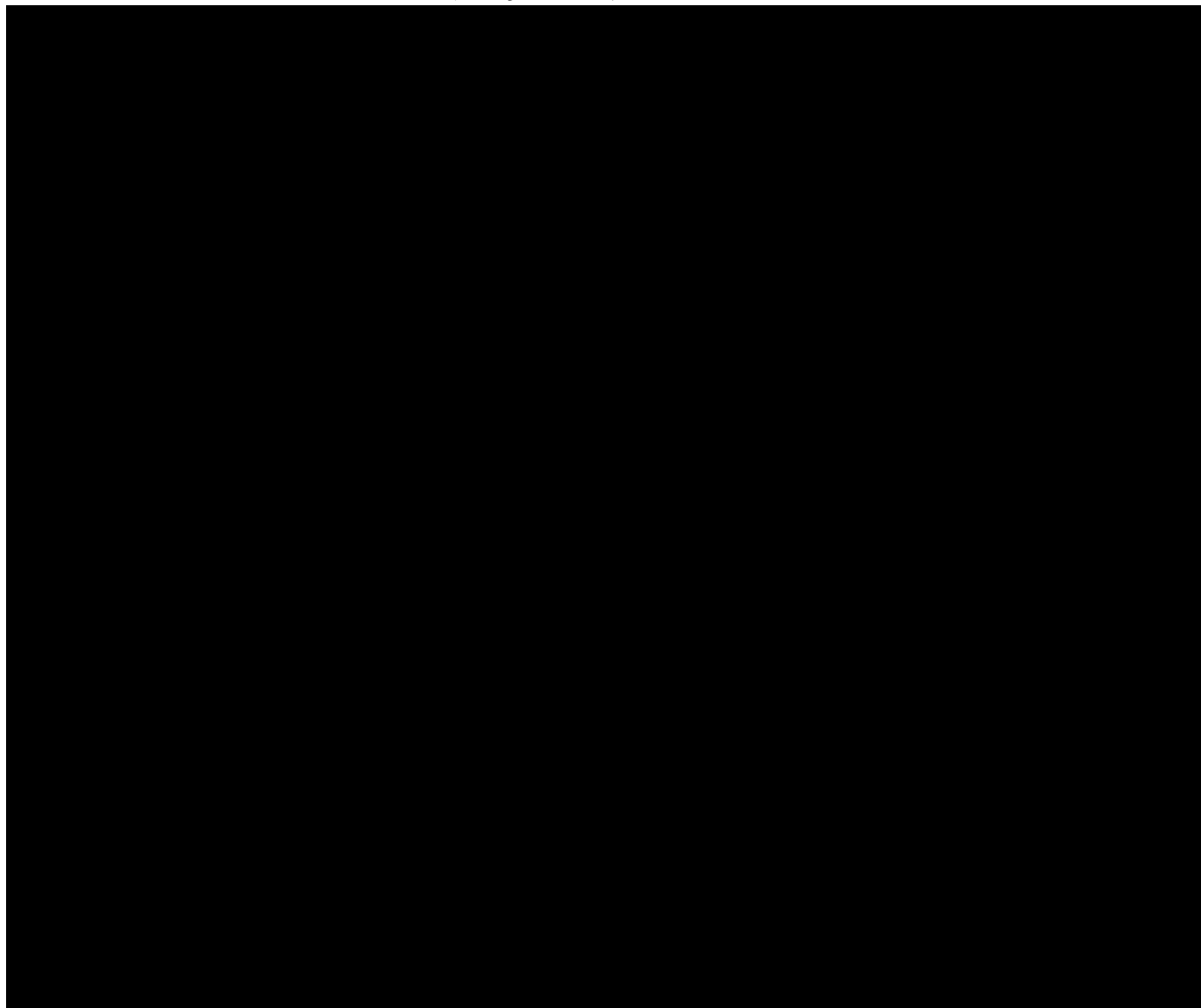


Figure 2-3 shows that, [REDACTED]
[REDACTED], the percentage of PG&E's customer load cleared in the DAM
[REDACTED]
[REDACTED]
[REDACTED]. PG&E

⁴⁹ Cal Advocates Attachment 2.3.

1 [REDACTED]
2 [REDACTED] A percentage of load cleared in the DAM [REDACTED]
3 [REDACTED] indicates that PG&E's load bidding strategy [REDACTED]
4 [REDACTED].

5 The net annual cost impact of PG&E's load forecast error was minimal in the 2025
6 Record Period. The net cost of PG&E CAISO cleared load in both the DAM and RTM in
7 2025 was [REDACTED]. If 100% of PG&E's actual customer load had cleared in the
8 CAISO DAM, the "ideal" net cost of cleared load would have been [REDACTED], only
9 [REDACTED] than realized net cost.

10 *Table 2-3: Annual Cost of 2025 CAISO Cleared Load⁵⁰*
11 (In millions)

<i>Record Year: 2025</i>	Actual	"Ideal"	"Perfect"
Dollar Value	[REDACTED]		
Difference from Actual			
% of Actual			

12
13 *Table 2-4: Historical Estimated Cost of Load Forecast Errors⁵¹ (Confidential)*
14 (In millions)

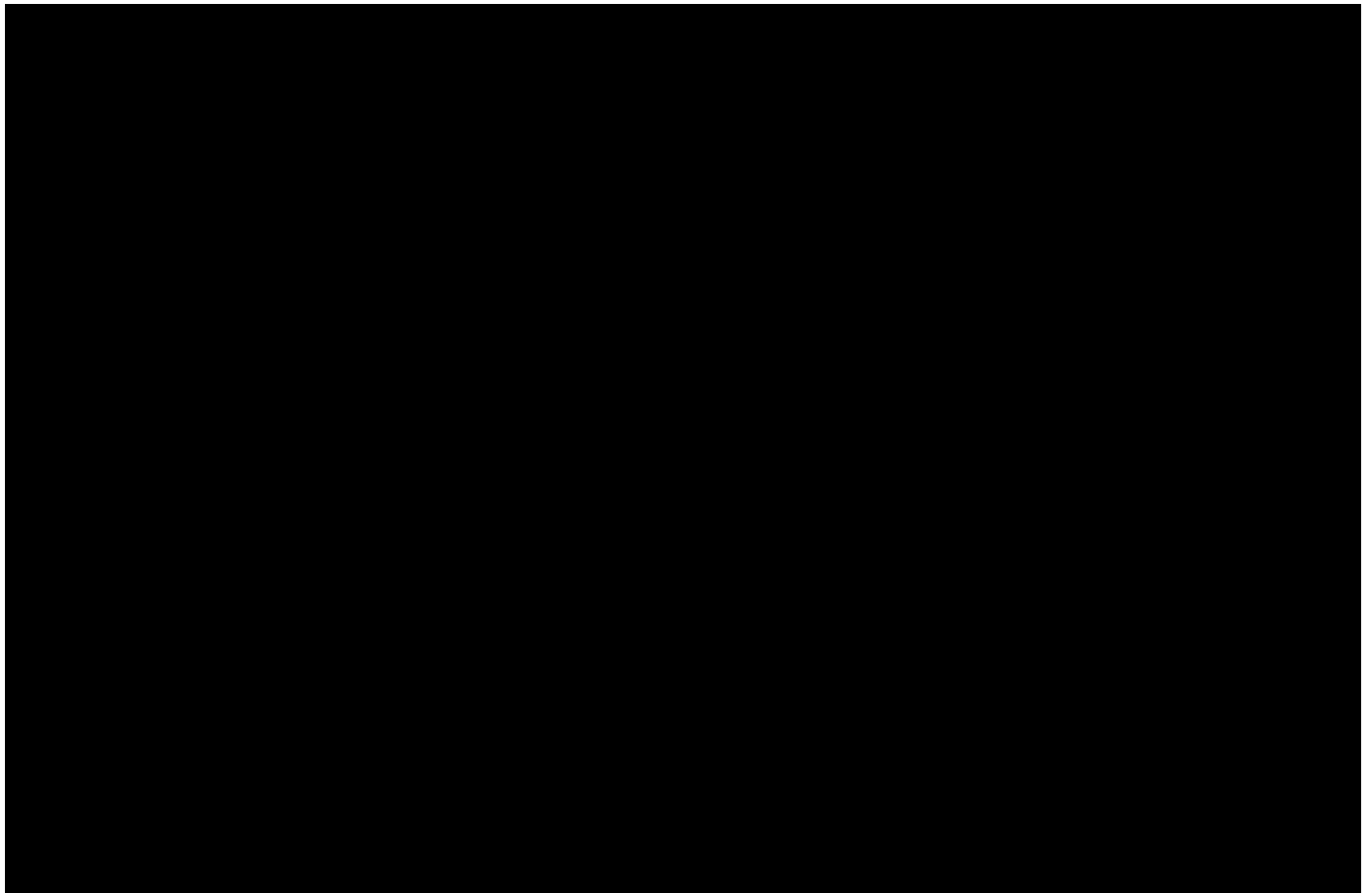
	2025	2024	2023
Net Cost of Annual Customer Load	[REDACTED]		
Net Cost of Load Forecast Errors			
% Cost of Load Forecast Errors⁵²			

⁵⁰ Attachment 2.2, tab [2025 Hourly Load]

⁵¹ A.26-02-019 Attachment 1.2 tab [2025 Hourly Load], A.25-02-013, Cal Advocates Testimony Attachment 2.5, A.24-02-012 Cal Advocates Testimony Attachment 2.22

⁵² Based on data applying the assumptions of the "Ideal" scenario.

1 *Figure 2-4: Annual Cost of 2025 CAISO Cleared Load⁵³ (Confidential)*



2
3
4 Figure 2-4 shows the average hourly net cost of energy in the Record Period.
5 Realized energy cost and “ideal” energy cost are [REDACTED]
6 [REDACTED], indicating that the annual average cost of PG&E’s hourly load forecast is
7 consistent with [REDACTED] The line plot of “perfect”
8 energy cost in 2025 is [REDACTED] than the realized cost of energy because it represents
9 [REDACTED] procurement in the RT market when RT prices are lower
10 than DA prices. The consistency of the realized and “ideal” energy cost averages shows
11 that PG&E’s load bidding strategy of submitting bids up to its forecasted load volume in
12 the DAM accurately approximates full procurement of PG&E’s customer load in the
13 DAM.

⁵³ Attachment 1.2, tab [Chart; Avg Daily Cost (hourly)].

Monthly and annual averages of cleared and forecasted load provide an effective summary of PG&E's load forecast in the Record Period. However, examining daily and hourly average load provides insight into patterns contributing to overall forecast error. PG&E states that the average daily MAPE of the short-term area load forecast was under [REDACTED] in the 2025 Record Period. PG&E's customer load is forecast by calculating adjustments to the area load forecast. PG&E's average daily and hourly load forecast MAPE values are [REDACTED] and [REDACTED] respectively. This indicates that adjustments to the short-term load forecast may be significantly contributing to errors in day-ahead load forecasting.

Table 2-5⁵⁴: PG&E Daily and Hourly Load MAPE in 2025

Year	Average Daily MAPE (100 HVE Days)	Average Daily MAPE (Cleared)	Average Daily MAPE (Forecast)	Average Hourly MAPE (Adjusted)
2025	[REDACTED]			
2024				
2023				
2022				

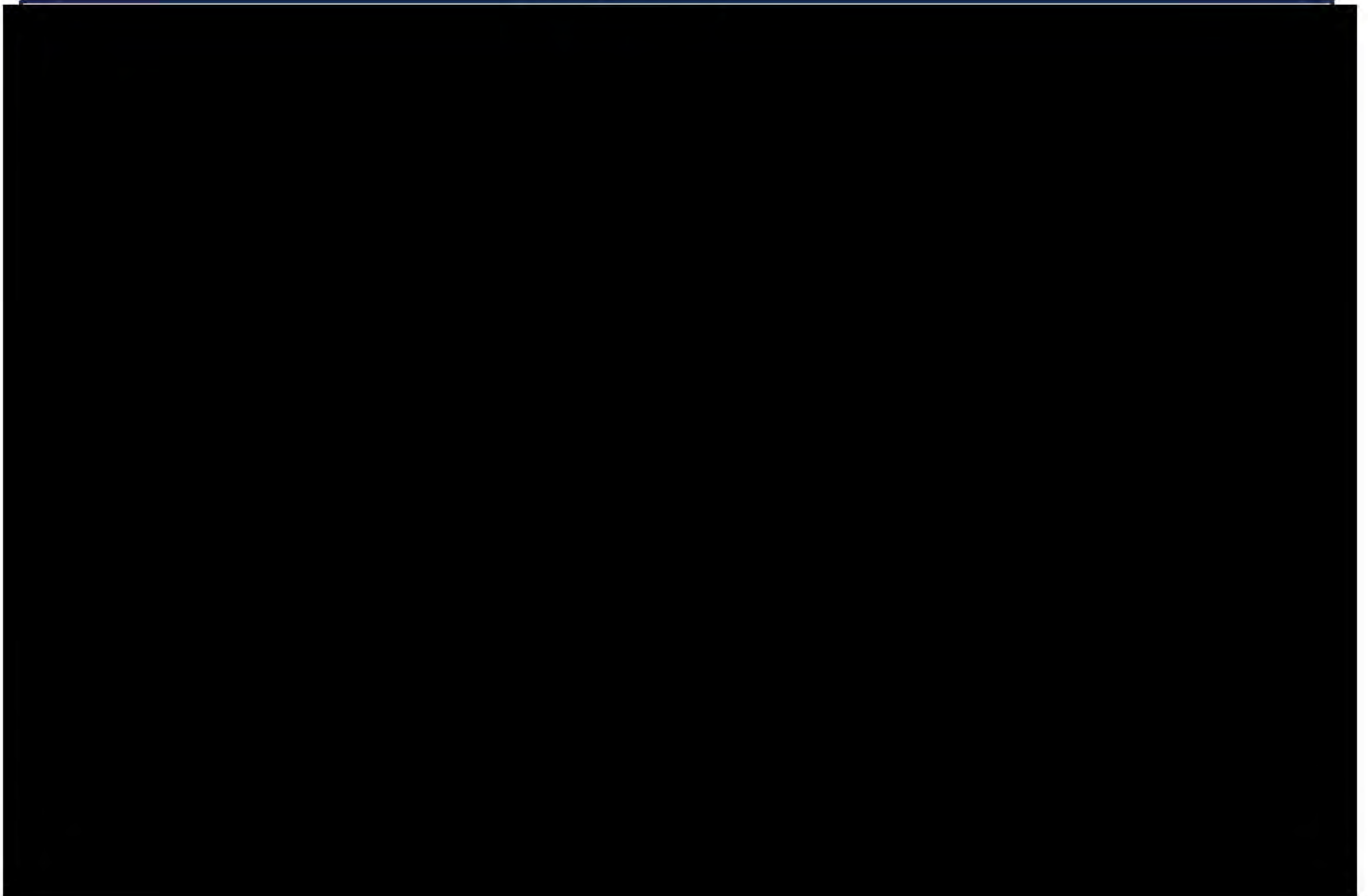
Table 2-4 shows average MAPE values of PG&E's load forecasts in the 2025 Record Period. Overall, daily MAPE averages are [REDACTED] than average hourly MAPE values. Over a day, some hours are over-forecasted while others are under-forecasted. Hours are over-forecasted if PG&E's DA electrical load forecast is greater than the RT electrical load of its customers. Similarly, hours are under-forecasted if the DA load forecast is less than the actual RT load. Cal Advocates calculates hourly MAPE in addition to daily MAPE because daily aggregation of load forecasts can mask pronounced error values in specific hours, or mask opposite error values that cancel each other out over the course of a day.

Overall, PG&E's load forecast performed [REDACTED] during the 100 highest-value energy days, which shows that PG&E's bid strategy [REDACTED] periods of

⁵⁴ Cal Advocates Attachment 2.2, "LCD_2025_Workpaper_6_HighestEnergyValueDays_CONF.xlsx".

1 heightened demand or high prices. The [REDACTED] average hourly MAPE of [REDACTED] indicates
2 that PG&E's load forecasts are [REDACTED] over hourly intervals than over daily
3 intervals. PG&E notes that when bundled customer load is low, such as during periods of
4 high rooftop solar production, small errors in load forecasts have an outsized impact on
5 percentage error metrics like MAPE.⁵⁵ Cal Advocates confirms that substantially higher
6 average MAPE values in hours ending (HE) 10-17 drive the elevated hourly MAPE
7 observed in 2025.

8 ***Figure 2-5: Yearly Average of Hourly MAPE and Hourly DA Clearing Price in 2025⁵⁶***
9 ***(Confidential)***

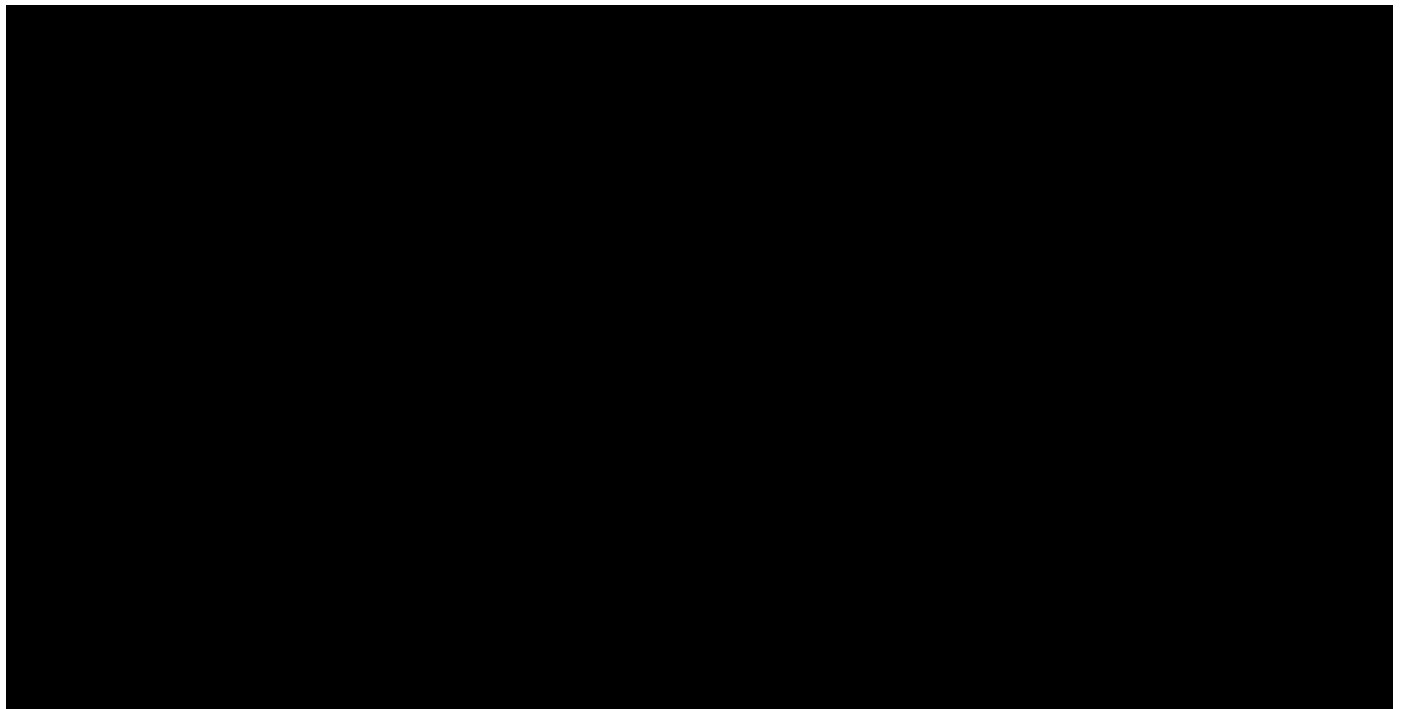


⁵⁵ A.26-02-019, PG&E Testimony at 1-13.

⁵⁶ Attachment 2.2, tab [Chart; Avg MAPE.v.\$ (hourly)].

1 Figure 2-5 shows that PG&E’s highest hourly average load MAPEs correspond to
2 hours with lower average DA price, and that higher price hours correspond to lower load
3 MAPEs. However, Figure 2-6 below shows that although high load forecast MAPE
4 values correspond with lower DA prices, high MAPEs also correspond to significant cost
5 impact. HE 10-17 account for [REDACTED] of costs
6 due to load forecast errors.⁵⁷ Although net annual estimated cost strictly due to forecast
7 errors is [REDACTED]
8 [REDACTED]⁵⁸

9 ***Figure 2-6: Net Cost Due to Load Forecasting Error⁵⁹ (Confidential)***



12 3. Summary Trends

13 Cal Advocates generated tables of aggregated statistics to facilitate the analysis of
14 seasonal patterns in PG&E load forecasting. Tab [2025 Hourly Load]⁶⁰ includes tables of

⁵⁷ Attachment 2.2, tab [Annual-Hourly Stats], columns D-O and AI-AT.

⁵⁸ Attachment 2.2. Net Cost is calculated by subtracting realized costs from “ideal” costs.

⁵⁹ Attachment 2.2, tab [Annual-Hourly Stats].

⁶⁰ Attachment 2.2, tab [2025 Hourly Load], columns AJ – BU.

1 hourly and monthly trends in frequency, volume, and cost of mis-forecasting. Tab
2 [Annual-Hourly Stats] provides a more detailed visual representation of monthly and
3 hourly trends in the cost and frequency of mis-forecasting. Cal Advocates used these
4 tables to identify patterns of high error rate and cost impact in 2025 with the potential to
5 be improved by targeted adjustments to PG&E's load forecasts.

6 PG&E's 2025 hourly load forecasts [REDACTED]
7 [REDACTED]. However, comparison of load and settlement data reveal patterns that
8 may be periodically recurring on a seasonal or annual basis and may be addressed by
9 PG&E's ongoing or future changes to forecast methodologies:

10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]
29 [REDACTED]
30 [REDACTED]
31 [REDACTED]
32 [REDACTED]

1 Overall, the estimated cost impacts of forecast errors are evenly distributed across
2 the Record Period and between over- and under-forecast errors. The variability in the
3 timing and the types of PG&E's load forecast errors in 2025 do not indicate systematic
4 bias towards specific forecast errors.

5 **4. Recommendations**

6 Cal Advocates does not object to PG&E's load forecasts in the 2025 Record
7 Period, which resulted in minimal cost impact to ratepayers. Cal Advocates notes that
8 PG&E should work to improve its average hourly load MAPE, reported at [REDACTED]. Cal
9 Advocates does not object to PG&E's load bidding calculations, which resulted in a
10 reliable grid for ratepayers.

11 **C. Management of Thermal Resources**

12 PG&E is required to bid its utility-retained and contracted thermal resources at
13 their incremental (marginal) costs, subject to safety, regulatory, legal, operational, and
14 financial requirements. PG&E is prohibited from taking any actions that result in a
15 preference for its utility-retained thermal generation resources relative to those under
16 contract with outside counterparties.⁶¹ PG&E states that it "makes no distinction between
17 its own resources and contracted resources in its bidding practices"⁶² [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED].⁶³

21 **1. Incremental Bid Cost Calculations**

22 PG&E schedules or bids⁶⁴ resources that have dispatch flexibility into the CAISO
23 market at the incremental cost of providing energy, considering the variable resource

⁶¹ D.02-12-069 at 62-63.

⁶² A.26-02-019, PG&E Testimony at 1-15.

⁶³ ERRR-2023-PGE-Compliance_DR_CalAdvocates_002-Q003CONF.

⁶⁴ Schedules commonly refer to self-schedules whereas bids refer to price-quantity offers to sell or buy in the CAISO Market (A.26-02-019, PG&E Testimony at 1-8, footnote 12).

operating cost and the most current market price forecast.⁶⁵ Resource costs that increase or decrease with resource output are properly treated as incremental costs.⁶⁶ Incremental energy bid costs include costs that vary directly with the generation of each additional MWh above the minimum operating point such as fuel costs, greenhouse gas (GHG) costs, and variable operations and maintenance (VOM) costs.⁶⁷ PG&E submits its calculated bids to the CAISO's day-ahead market, and the CAISO dispatches the resource if the bid price is less than or equal to the locational marginal price (LMP) that the CAISO calculated for the node at which the resource is located. In addition to its portfolio of utility-owned resources, PG&E bids and schedules contracted resources and calculates the incremental costs of contracted resources based on their contract terms.⁶⁸

In the 2025 Record Period, PG&E submitted [REDACTED] day-ahead hourly bids to the CAISO for its thermal resources. Of these thermal bids, there were no bidding events that resulted in a bid price variance of over \$0.10. All thermal resources were bid into the CAISO market when available. In this and prior Record Periods, PG&E's percentage error rates for thermal bids [REDACTED]. Cal Advocates does not object to PG&E's bid cost calculation activities in the Record Period.

2. Bidding Activity

During the 2025 Record Period, PG&E submitted bids for dispatchable thermal resources during all available hours. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].⁶⁹ PG&E submits bids for resources even during outage periods to prevent traders from forgetting to bid the resource once it is operational again. The outage card

⁶⁵ A.26-02-019, PG&E Testimony at 1-8.

⁶⁶ A.26-02-019, PG&E Testimony at 1-8.

⁶⁷ A.26-02-019, PG&E Testimony at 1-9.

⁶⁸ A.26-02-019, PG&E Testimony at 1-9.

⁶⁹ A.26-02-019, Chapter 1 Workpapers, "2025_LCD_2_Bid_Cost_Calculation_Summary_CONF.docx".

1 communicates to CAISO that although a bid has been submitted, the resource is either
2 fully or partially unavailable.⁷⁰

3 Among the [REDACTED] hourly bids that PG&E submitted to the CAISO for its
4 thermal resources, [REDACTED] or [REDACTED] were flagged as “non-awards,” meaning that they were
5 not fully dispatched although the incremental bid cost was lower than the LMP.⁷¹ In all
6 [REDACTED] instances, the non-award was justifiable because the resource had an outage card
7 limiting its available capacity, was providing ancillary services, was receiving regulation
8 awards, or was a multi-stage generator transitioning from one configuration to another.
9 In 2024, PG&E flagged [REDACTED] out of [REDACTED] hours [REDACTED] as non-awards.⁷² Cal
10 Advocates does not object to PG&E’s thermal dispatch exceptions in the 2025 Record
11 Period.

12 3. Self-Scheduling and Must-Take Resource Bidding

13 PG&E’s portfolio includes resources that have no economic flexibility due to
14 safety, environmental and license constraints, regulatory requirements, or because it is
15 inherently non-dispatchable.⁷³ Rather than submit economic bids to the CAISO for these
16 resources, PG&E self-schedules the must-take and must-run supply in the DAM based on
17 its forecast of their generation, and then modifies these self-schedules in real-time if the
18 forecast of generation changes.⁷⁴ Dispatchable resources may be self-scheduled during
19 resource testing or due to scheduling error.

20 In the 2025 Record Period, PG&E did not self-commit any dispatchable thermal
21 resources. There were no reported incidences of erroneous self-commitment during the

⁷⁰ A.16-02-019, PG&E response to the Public Advocates Office Data Request 012, Question 3.

⁷¹ A.26-02-019, Chapter 1 Workpapers, “2025_LCD_Workpaper_2_BidCostCalculation_CONF.xlsx”,
tab [Table 2.2 - Annual Non-Award].

⁷² A.25-02-013, PG&E Testimony at 1-30.

⁷³ A.26-02-019, PG&E Testimony at 1-10.

⁷⁴ A.26-02-019, PG&E Testimony at 1-10.

Record Period.⁷⁵ Therefore, Cal Advocates does not object to PG&E's management of self-schedules and must-take resources.

4. Management of Hydroelectric Resources

a. Overview

Generation from hydroelectric resources is limited by the availability of water. Water may be considered a zero-cost fuel, but the availability of this zero-cost fuel (except in the case of pumped storage hydro) is typically limited by rainfall, runoff, and reservoir levels.⁷⁶ While some hydro resources such as run-of-river resources cannot be controlled at all, other hydro resources can be stored behind a dam and may be considered dispatchable generation. PG&E attempts to dispatch its hydro resources when DA and RT market prices are highest to perform least-cost dispatch. To limit inefficient dispatch, PG&E bids and schedules hydro resources based on their estimated opportunity costs of utilizing the resource at a future time when it may be more valuable.⁷⁷ Least-cost dispatch of hydro resources must take into consideration the uncertainty of weather conditions such as the likelihood of precipitation and high temperatures, the future availability of water, and any potential operating constraints. PG&E utilizes three hydro modeling tools (PLEXOS, TESS, and Xpress) for forecasting and optimizing hydropower generation.⁷⁸

b. Analysis

In 2025, PG&E's hydro resources were, on average, dispatched during [REDACTED] of the 500 highest energy value (HEV) hours, as determined by ranking the highest hourly locational marginal price values. PG&E's hydro dispatch in the top 100 HEV hours [REDACTED] [REDACTED] which indicates that PG&E hydro resources were effectively dispatched in the highest-price hours.

⁷⁵ A.26-02-019, Chapter 1 Workpapers, 2025_LCD_3_SelfCommitment_CONF.

⁷⁶ A.24-02-012, PG&E Testimony at 1-16.

⁷⁷ A.26-02-019, PG&E Testimony at 1-17.

⁷⁸ A.26-02-019, Chapter 1 Workpapers, 2025_LCD_4_Hydro_Resources_Summary.

Table 2-6: PG&E’s Dispatch of Hydro Resources in HEV Hours During the Record Period⁷⁹

<u>Year</u>	2025	2024 ⁸⁰	2023 ⁸¹
% Dispatch in the Top 500 HEV Hours			
% Dispatch in the Top 100 HEV Hours			

PG&E dispatched its hydro resources in the top 100 and 500 HEV hours [REDACTED] in 2025 than in the 2024 Record Period, when hydro resources were dispatched during [REDACTED] of the 500 HEV hours, [REDACTED] than in 2023. In 2025 most of PG&E’s 32 dispatchable hydro units were individually dispatched between [REDACTED] and [REDACTED] of the 500 highest energy value hours.⁸² Cal Advocates does not object to PG&E’s hydro resource management in the 2025 Record Period.

c. Summary and Recommendations

Overall, PG&E demonstrated that it successfully dispatched its hydro resources during times when the price and value of energy is high according to least-cost dispatch principles. Cal Advocates finds that PG&E appropriately dispatched its hydro resources in the 2025 Record Period.

5. Management of Energy Storage and Renewable Resources

a. Overview

PG&E contracts with and owns renewable resources with economic bidding rights.⁸³ The economic bidding of these resources captures the incremental and

⁷⁹ A.26-02-019, Chapter 1 Workpapers, 2025_LCD_4_Hydro_Top_500, tab [Table 4.3 Hydro Stat].

⁸⁰ A.25-02-013, PG&E Chapter 1 Workpapers, “2024_LCD_Workpaper_4_Hydro_Top_500_CONF.xlsx” tab [Table 4.3 Hydro Stat].

⁸¹ A.24-02-018, PG&E Chapter 1 Workpapers, “2023_LCD_4_Hydro_Top_500.xlsx”, tab [Table 4.3 Hydro Stat].

⁸² A.26-02-019, Chapter 1 Workpapers, 2025_LCD_4_Hydro_Top_500, tab [Table 4.3 Hydro Stat].

⁸³ A.26-02-019, PG&E Testimony at 1-26.

1 opportunity costs associated with contractual and operational constraints [REDACTED]
2 [REDACTED]
3 [REDACTED].⁸⁴ In addition to calculating the cost components making up the bid
4 cost for the economic dispatch of renewable energy in the day-ahead market, PG&E
5 evaluates market prices and opportunity costs associated with the curtailment of
6 renewables. For example, sometimes the CAISO-reported net energy demand
7 approaches the minimum must-offer threshold and increases the risk of overgeneration.
8 Overgeneration can burden distribution and transmission lines and lead to surges and
9 outages. At these times, energy prices are often negative to provide a financial incentive
10 for generators to “turn off” and reduce the amount of energy flowing into the grid. This
11 scenario typically occurs at midday when solar generation is at its peak. Much like hydro
12 resources, renewables do not have explicit fuel costs, but renewables can be economically
13 curtailed at times when the CAISO system is approaching overgeneration conditions and
14 energy costs are negative.

15 Scheduling coordinators curtail renewables after other thermal resources with
16 flexible operating protocols have already been turned off. However, to ensure
17 compliance with California’s Renewables Portfolio Standard (RPS) and LCD
18 requirements, the utilities assess the opportunity cost of not generating the Renewable
19 Energy Credits (RECs) associated with renewable generation when determining their
20 curtailment bids. [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED].⁸⁵

24 PG&E’s renewable portfolio includes battery storage resources that can charge
25 and store energy during times of the day when energy is least expensive and can generate
26 the stored energy at times when energy is most expensive, similar to pumped hydro

⁸⁴ A.26-02-019, PG&E Testimony at 1-26.

⁸⁵ A.26-02-019, PG&E Testimony at 1-26.

resources. The 182.5 MW Elkhorn Battery Energy Storage System (BESS) is PG&E's only utility-owned energy storage resource in 2025. PG&E considers both charging costs and Variable Storage Operations Costs when calculating default energy bids for the Elkhorn BESS.⁸⁶ PG&E relies on Fluence Mosaic, a 3rd party vendor, to produce optimized charging schedules and dispatch bids for Elkhorn in both the DAM and RTM.

[REDACTED]

[REDACTED]

[REDACTED]. In 2025, the Elkhorn BESS was taken out of service for the majority of the year due to issues currently under investigation.⁸⁷

In 2025, PG&E's portfolio included [REDACTED] contracted energy storage resources that began commercial operation prior to the Record Period. PG&E contracted [REDACTED] energy storage resources with Commercial Operation Dates (CODs) within the 2025 Record Period, with an additional [REDACTED] projects with expected CODs from 2026 through 2028. In total, PG&E states that it paid [REDACTED] to counterparties for contracted energy storage resources in 2025. PG&E began the year with [REDACTED] of contracted BESS capacity, and ended the Record Period with [REDACTED] of contracted BESS capacity.

b. Analysis

The Commission has stated that it will "consider whether to institute a rulemaking proceeding covering all affected IOUs regarding storage resources, including consideration of the development of more detailed standards governing LCD compliance."⁸⁸ As of the filing date of this testimony, the Commission has not established specific reporting or dispatch requirements for energy storage resources. Cal Advocates retrieved summary details of PG&E's contracted and UOG battery storage resources in response to its Master Data Request. Cal Advocates will continue to request information regarding PG&E's dispatch of its contracted and utility-owned energy

⁸⁶ A.26-02-019, PG&E Testimony at 1-23.

⁸⁷ A.26-02-019, PG&E Testimony at 1-23.

⁸⁸ D.21-07-018 at 16.

1 storage resources to develop a record of their operations in each Record Period. Cal
2 Advocates will review PG&E's operation of energy storage resources for compliance
3 once reporting requirements for energy storage dispatch are established.

4 **c. Summary and Recommendations**

5 Cal Advocates does not object to PG&E's reporting of Energy Storage resources
6 in the 2025 Record Period.

7 **D. 2025 Market and Business Process Changes**

8 **1. Overview**

9 In the 2025 Record Period, PG&E did not participate in market initiatives that directly
10 affected day ahead or real time scheduling and bidding processes.

11 **E. Management of Demand Response Programs**

12 **1. Overview**

13 PG&E manages several types of demand response (DR) programs which are bid
14 into the CAISO day-ahead market. Cal Advocates reviews PG&E's management of the
15 Capacity Bidding Program (CBP), the SmartAC Program, and the Automated Response
16 Technology (ART) Program⁸⁹ because these programs have economic triggers or may be
17 economically dispatched. These DR programs are "represented as Proxy Demand
18 Response (PDR) resources in PG&E's portfolio and bid into the day-ahead markets based
19 on calculated availabilities and dispatch trigger prices."⁹⁰

20 **2. Capacity Bidding Program (CBP)**

21 The CBP is a "voluntary DR program that offers customers capacity and energy
22 payments for being on standby to reduce load and for reducing energy consumption when
23 requested by PG&E."⁹¹ Program participants enroll through a third-party aggregator who
24 receives the capacity payments and awards the payments to subscribing customers.⁹² The

⁸⁹ A.26-02-091, PG&E Testimony at 1-33.

⁹⁰ A.26-02-019, PG&E Testimony at 1-33.

⁹¹ A.26-02-019, PG&E Testimony at 1-35.

⁹² PG&E Electric Bidding Schedule E-CBP, April 14, 2021. Accessed at

1 CBP is available from May 1st to October 31st of each year and typically operates
2 4:00pm to 9:00pm Monday through Saturday⁹³ with a maximum dispatch of 30 hours per
3 month.⁹⁴ In the 2025 Record Period, PG&E’s CPB program offered only the Elect option
4 pursuant to D.23-12-005,⁹⁵ which directed PG&E to eliminate the CBP Prescribed and
5 Elect+ options.⁹⁶ The CPB Elect option allows aggregators to choose the CAISO day-
6 ahead price trigger in each dispatch hour (capped at \$650/MWh)⁹⁷ and participate in
7 more than the standard six dispatch events per month. PG&E may trigger the CBP Event
8 when PG&E receives a market award or dispatch instruction from the CAISO for a PDR
9 that is part of the CBP.⁹⁸ A CBP “Emergency Only” Event may be triggered in response
10 to a CAISO-issued Grid Warning, or an emergency notice issued by the Governor’s
11 Office.⁹⁹

12 During the 2025 Record Period, PG&E dispatched CBP resources on three
13 occasions for a total of four event hours. In comparison, PG&E dispatched CBP
14 resources on 10 occasions for a total of 16 event hours in 2024, and dispatched CBP
15 resources on 10 occasions for 36 hours in 2023. PG&E attributed the decrease in
16 dispatch frequency and duration in 2025 to overall lower LMPs in summer months
17 compared to 2024.¹⁰⁰ In 2025, DA CAISO prices exceeded \$100 in 8 hours from May
18 through October,¹⁰¹ compared with 110 hours in 2024.¹⁰²

https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_SCHEDS_E-CBP.pdf.

⁹³ Except in May, when the CPB program runs 5pm-10pm, and in October, when the CBP program does not run on Saturdays.

⁹⁴ A.26-02-019, PG&E Testimony at 1-35.

⁹⁵ A.26-02-019, PG&E response to Cal Advocates DR09 Q06.

⁹⁶ Ordering Paragraph 29, at 224.

⁹⁷ A.26-02-019, PG&E Testimony at 1-35.

⁹⁸ PG&E Electric Bidding Schedule E-CBP, Sheet 11.

⁹⁹ PG&E Electric Bidding Schedule E-CBP, Sheet 11.

¹⁰⁰ A.26-02-019, PG&E Testimony at 1-36.

¹⁰¹ A.26-02-019, PG&E response to Cal Advocates MDR 1.3.17.

¹⁰² A.25-02-018, PG&E response to Cal Advocates MDR 1.3.17.

Table 2-7: Annual PG&E CBP Dispatch Event Data

<u>Year</u>	2025	2024	2023	2022
Number of CBP Dispatch Events	3	10	10	24
Number of Dispatched CBP Hours	4	16	36	70
Average Price at Dispatch (\$/MWh)				

CBP dispatch has decreased over recent years due to a number of factors, including the removal of the CBP Prescribed option in 2024 and significantly lower LMPs in 2025.¹⁰³ Although CBP resources were not dispatched as frequently in 2025 as in previous years, PG&E consistently dispatched CBP resources at high-value hours. During the times that the CBP trigger conditions were met, and resources were dispatched,¹⁰⁴ the average hourly net cost was [REDACTED] in 2025, versus [REDACTED] in 2024. PG&E reports no instances in the Record Period in which CBP dispatch triggers were forecasted to be met and the CBP program was not dispatched. PG&E dispatched CBP resources at appropriately high-value hours in the Record Period.

3. Smart AC Program

a. Background

PG&E's SmartAC program is a voluntary DR program available to residential customers¹⁰⁵ integrated as a PDR in the CAISO DAM.¹⁰⁶ Participants in the SmartAC program allow PG&E to install a "load control device at a customer's premises that can temporarily disengage the customer's primary central Air Conditioning (A/C) unit"¹⁰⁷ to reduce power consumption on hot days. The SmartAC program is available from May 1st

¹⁰³ A.26-02-019, PG&E Testimony at 1-36.

¹⁰⁴ This is also known as an "actual" dispatch.

¹⁰⁵ A.26-02-019, PG&E Testimony at 1-40.

¹⁰⁶ A.26-02-019, PG&E Testimony at 1-41.

¹⁰⁷ A.26-02-019, PG&E Testimony at 1-40.

1 through October 31st of each year consistent with times of high A/C usage. The SmartAC
2 program can be dispatched up to 100 hours per customer per year, however PG&E targets
3 20 hours of economic dispatch per service account annually to avoid customer attrition.¹⁰⁸

4 PG&E terminated the commercial component of the SmartAC program and ceased
5 accepting new residential enrollments pursuant to D.23-12-005.¹⁰⁹ In A.22-05-002,
6 PG&E recommended a slow sunset of SmartAC programs and proposed a more cost-
7 effective Automated Response Technology (ART) program, portions of which would
8 serve similar functions as existing SmartAC programs. The Commission has authorized
9 PG&E to use up to \$1.6 million of its approved ART budget to transition customers from
10 the Smart AC program to the ART.¹¹⁰

11 **b. Program Dispatch**

12 The SmartAC program is both a reliability program used during emergencies and
13 an economic program based on wholesale energy prices which can be dispatched:

14 a) Upon the CAISO's order:

15 i. After the dispatch of Condition 2 Reliability Must-Run (RMR)
16 units and prior to canvassing other entities and Balancing
17 Authorities for available Manual Dispatch Energy/Capacity on
18 interties;

19 ii. Based on its forecasted system conditions and operating
20 procedures; or

21 iii. During emergency or near-emergency situations;

22 b) At the discretion of PG&E's energy operations center in response to a
23 CAISO economic award in the wholesale market or high wholesale
24 energy prices; or

25 c) During program testing.¹¹¹

¹⁰⁸ A.26-02-019, PG&E Testimony at 1-41.

¹⁰⁹ D.23-12-005 at 63 and Ordering Paragraph (OP) 24.

¹¹⁰ D.23-12-005 at 65.

¹¹¹ A.26-02-019, PG&E Testimony at 1-40.

1 [REDACTED]
2 [REDACTED]. To determine economical
3 dispatch of the SmartAC Switch program, PG&E uses Sub-LAP (Load Aggregation
4 Point) temperatures¹¹² to forecast periods of significant load reduction potential. When
5 Sub-LAP temperatures exceed a certain threshold and the economic trigger is forecast to
6 be met, PG&E lowers the bid price from the default emergency level. PG&E sets the
7 SmartAC bid price to the price set by CAISO's monthly Net Benefit Test (NBT). PG&E
8 may lower SmartAC bid prices from emergency levels to trigger market awards and
9 provide demand response benefits.¹¹³

10 During the 2025 Record Period, PG&E dispatched its SmartAC Switch resources
11 on four (4) occasions for a total of 9 hours.¹¹⁴ By comparison, in the 2024 Record Period,
12 PG&E dispatched its SmartAC Switch resources on [REDACTED] occasions for a total of [REDACTED]
13 [REDACTED].¹¹⁵ During actual SmartAC dispatch events in 2025, the average hourly net cost was
14 [REDACTED], versus [REDACTED] in 2024.¹¹⁶ By comparison, the average hourly
15 forecast price for all times that the SmartAC trigger conditions were met in 2025,
16 whether they were dispatched or not, was [REDACTED], versus [REDACTED] in 2024.¹¹⁷
17 Overall, 2025 peak electrical market prices, including prices corresponding to potential
18 SmartAC dispatch triggers in 2025, were much lower than those observed in 2024. The
19 difference in price in 2025 between the average hourly LMP and the average hourly
20 forecast LMP is [REDACTED]. PG&E reports no instances in the Record Period when
21 SmartAC resources received a market award but resources were not dispatched. PG&E
22 dispatched SmartAC resources at appropriately high-value hours in the Record Period.

¹¹² Temperatures in local areas determined by CAISO pricing nodes.

¹¹³ A.26-02-019, PG&E Testimony at 1-42.

¹¹⁴ A.26-02-019, PG&E Testimony at 1-42

¹¹⁵ A.25-02-013, PG&E Testimony at 1-41.

¹¹⁶ A.26-02-019, PG&E Testimony at 1-44; A.25-02-013, PG&E Testimony at 1-44.

¹¹⁷ A.26-02-019, PG&E Testimony at 1-44; A.25-02-013, PG&E Testimony at 1-44.

4. Automated Response Technology

a. Overview

PG&E’s Automated Response Technology (ART) program is a voluntary demand response program available to residential customers and is administered by third parties known as “Providers.”¹¹⁸ Providers recruit retail customers with smart home technologies, sometimes referred to as Distributed Energy Resources (DERs), manage demand response event activities, and provide customer incentives.¹¹⁹ PG&E incentivizes Provider participation in demand response events through capacity payments based on the actual performance of a Provider. The ART program participates in the CAISO DAM as a PDR that can be dispatched for up to four hours per day.¹²⁰ The ART program is required to dispatch all enrolled customers for a minimum of one hour per month to determine the capacity value of an ART Provider’s portfolio.¹²¹

b. Program Dispatch

In 2025, PG&E used sub-LAP temperature forecasts as a proxy for determining load-reduction potential and the economic impact of dispatching its ART program. The primary enrolled DER for the ART Program in 2025 was Smart Thermostats, which are thermostats whose set-points can be remotely operated as a demand response resource.¹²² The capacity of demand response that can be provided by the manipulation of thermostat set-points is highly temperature-dependent. Therefore, PG&E dispatched the ART program using sub-LAP temperature thresholds to dispatch the program similar to the methodology used to dispatch the Smart AC program.¹²³ ART PDRs are typically bid into the CAISO market at \$949/MWh when sub-LAP temperature thresholds are not

¹¹⁸ A.26-02-019, PG&E Testimony at 1-45.

¹¹⁹ A.26-02-019, PG&E Testimony at 1-45.

¹²⁰ A.26-02-019, PG&E Testimony at 1-45.

¹²¹ A.26-02-019, PG&E Testimony at 1-45.

¹²² A.24-02-018, PG&E Testimony at 1-50, in reference to the Smart Thermostats Pilot program.

¹²³ A.26-02-019, PG&E Testimony at 1-45, 46.

forecasted to be met.¹²⁴ PG&E lowers the bid price to the level of the monthly CAISO Net Benefit Test when hourly temperatures are forecasted to meet the temperature threshold.

During the 2025 Record Period, PG&E dispatched its ART resources on [REDACTED] occasions for a total of [REDACTED] hours. During actual ART dispatch events in 2025, the average hourly net cost was [REDACTED] versus [REDACTED], the average hourly potential price for all times that ART trigger conditions were forecasted.¹²⁵ In 2025, the average dispatch price of ART resources was [REDACTED] less than the average price when price triggers were forecast to be met.

Table 2-8: Dispatch in the Highest Forecast Price Hours:¹²⁶

Year	<u>2025</u>	<u>2024</u>	<u>2023</u>
Hours with DA Price Forecast > \$80	27	180	336
Hours with DA Price Forecast > \$100	2	94	128

In 2025, CAISO DAM prices were forecasted to exceed \$80 in only 27 hours,¹²⁷ compared with 180 hours in 2024¹²⁸ and 336 in 2023.¹²⁹ In 23 of those 27 hours, the actual DA CAISO clearing price exceeded \$80/MWh. PG&E dispatched the ART program in none of these highest-cost hours. PG&E notes that temperatures across its service territory were uncommonly cool throughout the entire 2025 summer season,¹³⁰ so PG&E's temperature threshold dispatch methodology for the ART program did not indicate that DR program dispatch was economical at these times.

¹²⁴ A.26-02-019, PG&E Testimony at 1-46.

¹²⁵ A.26-02-019, PG&E Testimony, Table 1-23.

¹²⁶ Data included in this table covers May-October 2025.

¹²⁷ A.26-02-019, PG&E Response to Cal Advocates MDR 1.3.17 (Q062).

¹²⁸ A.25-02-018, PG&E Response to Cal Advocates MDR 1.3.17 (Q062).

¹²⁹ A.24-02-018, PG&E Response to Cal Advocates MDR 1.3.15.

¹³⁰ A.26-02-019, PG&E Testimony at 1-46.

1 PG&E's ART program was not consistently dispatched in the highest-value hours
2 in the Record Period. However, the estimated economic impact of failing to dispatch the
3 ART program in the highest-value energy hours is small because in 2025, high CAISO
4 DAM prices occurred significantly less than in prior years. Additionally, dispatch of an
5 ART program primarily enrolling Smart Thermostats during high forecast prices may not
6 yield significant load reduction and cost savings if the thermostats are not in use upon
7 dispatch. However, as PG&E's ART program continues operation and enrolls a wider
8 range of DER technologies, PG&E should consider the development of economic
9 thresholds that would trigger the dispatch of the ART program.

10 PG&E reports no instances in the Record Period when ART resources received a
11 market award but resources were not dispatched. PG&E dispatched ART resources at
12 appropriately high-value hours in the Record Period.

13 c. Summary and Recommendations

14 Average LMP for forecasted trigger event days and actual dispatch days for the
15 CBP and SmartAC Program indicate PG&E optimized its demand response resources
16 during the hours with higher energy values. Cal Advocates recommends that PG&E
17 consider developing economic dispatch triggers for its ART programs in addition to
18 temperature triggers. Cal Advocates does not object to PG&E's management of its CBP
19 and SmartAC resources.

20 V. CONCLUSION

21 Overall, Cal Advocates does not object to PG&E's management of its thermal,
22 hydro, storage, renewable, and demand response resources and does not recommend any
23 disallowances.

LIST OF ATTACHMENTS FOR CHAPTER 2

#	Attachment	Description
1	Attachment 2.1 (Confidential)	A.26-02-019, Cal Advocates Workpapers – 2025_PG&E_ERRA-C_LCD-Price Forecast Analysis_CONF.xlsx (Available via e-mail)
2	Attachment 2.2 (Confidential)	A.26-02-019, Cal Advocates Workpapers – 2025_PG&E_ERRA-C_LCD-Load Forecast Analysis_CONF.xlsx (Available via e-mail)
3	Attachment 2.3 (Confidential)	A.26-02-019, Cal Advocates Workpapers – PG&E_ERRA-Comp_LCD_Total Load Analysis_2015-2025_CONF.xlsx (Available via e-mail)
4	Attachment 2.4 (Confidential)	A.26-02-019 – PG&E Opening Testimony – ERRA-2025-PGE-Compliance_Test_PGE_20260227-CONF.pdf (Available via e-mail)
5	Attachment 2.5 (Confidential)	A.26-02-019, PG&E Chapter 1 Workpapers – LCD_2025_Workpaper_6_HighestEnergyValueDays_CONF.xlsx (Available via e-mail)
6	Attachment 2.6 (Confidential)	A.25-02-013 – PG&E Chapter 1 Workpapers, LCD_2024_Workpaper_6_HighestEnergyValueDays_CONF.xlsx (Available via e-mail)
7	Attachment 2.7 (Confidential)	A.24-02-012 – PG&E response to Cal Advocates DR 08 Q02, ERRA-2023-PGE-Compliance_DR_CalAdvocates_007-Q002CONF.pdf
8	Attachment 2.8 (Confidential)	A.26-02-019 – PG&E response to Cal Advocates MDR 1.3.17, ERRA-2025-PGE-Compliance_DR_CalAdvocates_MDR001-Q062.pdf
9	Attachment 2.9 (Confidential)	A.26-02-019 – PG&E response to Cal Advocates MDR 1.3.17, ERRA-2025-PGE-Compliance_DR_CalAdvocates_MDR001-Q062.xlsx (Available via e-mail)
10	Attachment 2.10 (Confidential)	A.26-02-019 – PG&E Chapter 1 Workpapers, 2025 LCD_Workpaper_7_Load_Bid_CONF.xlsx (Available via e-mail)
11	Attachment 2.11 (Confidential)	A.25-02-013 – PG&E Chapter 1 Workpapers, 2024 LCD_Workpaper_7_Load_Bid_CONF.xlsx (Available via e-mail)
12	Attachment 2.12 (Confidential)	A.24-02-012 – PG&E Chapter 1 Workpapers, 2023 LCD_Workpaper_7_Load_Bid_CONF.xlsx (Available via e-mail)

#	Attachment	Description
13	Attachment 2.13 (Confidential)	A.24-02-012 – PG&E response to Cal Advocates DR 02 Q03, ERRA-2023-PGE-Compliance_DR_CalAdvocates_002-Q003CONF.pdf
14	Attachment 2.14 (Confidential)	A.26-02-019 – PG&E Chapter 1 Workpapers, 2025_LCD_Workpaper_2_BidCostCalculation_CONF.xlsx (Available via e-mail)
15	Attachment 2.15 (Confidential)	A.25-02-013 – PG&E Opening Testimony, PDFA_ERRA-2024-PGE-Compliance_Test_PGE_20250228-CONF.pdf (Available via e-mail)
16	Attachment 2.16 (Confidential)	A.24-02-012 – PG&E Opening Testimony, PDFA_ERRA-2023-PGE-Compliance_Test_PGE_20240228-CONF.pdf (Available via e-mail)
17	Attachment 2.17 (Confidential)	A.26-02-019 – PG&E Chapter 1 Workpapers, 2025 LCD_Workpaper_4_Hydro_Top_500_CONF.xlsx (Available via e-mail)
18	Attachment 2.18 (Confidential)	A.26-02-019 – PG&E Chapter 1 Workpapers, 2025 LCD_4_Hydro_Resources_Summary_CONF.pdf
19	Attachment 2.19 (Confidential)	A.25-02-013 – PG&E Chapter 1 Workpapers, 2024 LCD_Workpaper_4_Hydro_Top_500_CONF.xlsx (Available via e-mail)
20	Attachment 2.20 (Confidential)	A.24-02-012 – PG&E Chapter 1 Workpapers, 2023 LCD_Workpaper_4_Hydro_Top_500_CONF.xlsx (Available via e-mail)
21	Attachment 2.21 (Confidential)	A.25-02-013 – PG&E response to Cal Advocates MDR 1.3.17, ERRA-2024-PGE-Compliance_DR_CalAdvocates_MDR001-Q062.pdf
22	Attachment 2.22 (Confidential)	A.25-02-013 – PG&E response to Cal Advocates MDR 1.3.17, ERRA-2024-PGE-Compliance_DR_CalAdvocates_MDR001-Q062.xlsx (Available via e-mail)
23	Attachment 2.23 (Confidential)	A.24-02-012 – PG&E response to Cal Advocates MDR 1.3.15, ERRA-2024-PGE-Compliance_DR_CalAdvocates_MDR001-Q062.pdf
24	Attachment 2.24 (Confidential)	A.24-02-012 – PG&E response to Cal Advocates MDR 1.3.15, ERRA-2024-PGE-Compliance_DR_CalAdvocates_MDR001-Q062.xlsx (Available via e-mail)

1 **CHAPTER 3: CONTRACT ADMINISTRATION**

2 (Witness: Jessica Zhang)

3 **I. INTRODUCTION AND SUMMARY**

4 This chapter presents Cal Advocates' review of PG&E's contract administration
5 activities during the 2025 Record Period. Cal Advocates examined PG&E's
6 administration of its energy and capacity procurement contracts. The purpose of Cal
7 Advocates' analysis in this chapter is to ensure the utility prudently administered its
8 contracts for the benefit of ratepayers and under the guidance set forth by the
9 Commission.

10 **II. BACKGROUND**

11 The ERRA Compliance proceeding requires that each IOU is assessed on an
12 annual basis for compliance regarding their energy resource contract administration.
13 Decision (D.) 02-10-062 outlines the minimum standards of conduct that the IOUs should
14 follow in their ERRA Compliance applications, including Standard of Conduct 4 (SOC4),
15 which states that "the utilities shall prudently administer all contracts and generation
16 resources and dispatch the energy in a least-cost manner."¹³¹ These standards are upheld
17 by a "regulatory process to verify and ensure that each contract was administered in
18 accordance with the terms of the contract, and contract disputes that may arise are
19 reasonably resolved."¹³² The ERRA framework provides the IOUs with "flexibility in
20 transacting for energy to meet their obligation to serve their customers so that the utilities
21 can take advantage of market opportunities that result in the low and stable prices."¹³³

¹³¹ D.02-10-062 at 74.

¹³² Public Utilities Code Section 454.5(d)(2).

¹³³ D.02-10-062 at 2.

1 **III. DISCUSSION**

2 **A. New Contracts and Contracts Beginning Delivery**

3 PG&E executed 105 energy, capacity, renewable energy sales, and GHG-free
4 energy sales contracts during the Record Period.¹³⁴ Of the 105 executed contracts, 66
5 were RA; 23 were GHG-Free Energy sales; 4 were RPS Energy REC sales or RPS
6 contracts; 12 were for Edison Electric Institute (EEI) Master, Energy Storage, Bioenergy
7 Market Adjustment Tarriff (BioMat), Green Tarriff Shared Renewable (GTSR), and
8 Renewable Market Adjusting Tariff (ReMat).¹³⁵ PG&E had 121 contracts¹³⁶ that began
9 delivery or commenced commercial operation during the Record Period totaling 9,321.7
10 MW.¹³⁷ In total, PG&E administered 508 contracts during the Record Period, resulting in
11 net energy deliveries of 9,058 gigawatt-hour (GWh) (15,567 GWh purchased and 6,509
12 GWh energy sold).¹³⁸ The net payment of energy and RA totaled \$1.84 billion. The total
13 includes \$2.36 billion in purchase costs of energy and RA, less \$520 million in sales
14 revenue of RA, REC, GHG-Free energy, and Voluntary Allocation and Market Offer
15 (VAMO) energy.¹³⁹

16 **B. Contract Amendment and Modifications**

17 PG&E executed 60 contract amendments during the Record Period. PG&E is not
18 requesting approval for any amendments or transactions entered into during the Record
19 Period. All other contract amendments and transactions that are not routine and/or
20 administrative in nature were submitted to the Commission for review and approval in
21 separate application or advice letters.¹⁴⁰

¹³⁴ PG&E Testimony at 9-14, Table 9-1.

¹³⁵ PG&E Testimony at 9-14, Table 9-1.

¹³⁶ The 121 contracts that commence delivery or achieved commercial operation during the Recorded Period, in addition to the 105 executed contracts.

¹³⁷ PG&E Testimony at 9-15, Table 9-2.

¹³⁸ PG&E Testimony at 9-1.

¹³⁹ PG&E Testimony at 9-2.

¹⁴⁰ PG&E Testimony at 9-20.

1 **C. Expired and Terminated Contracts**

2 There were 103 contracts that expired and seven contracts that were terminated
3 during the Record Period.¹⁴¹ PG&E collected termination payments and liquidated
4 damages in the amount of \$60,237,575 during the Record Period from projects that did
5 not meet their performance obligations, including missed milestones and Guaranteed
6 Energy Production (GEP).¹⁴² Cal Advocates does not oppose PG&E's termination of
7 contracts in this Record Period.

8 **D. Dispute**

9 **1. Zero Waste Energy Development Company LLC, ZERO**
10 **Waste Energy Project (PG&E Log No. 33R405BIO)**

11 During the Record Period, PG&E managed a dispute with Zero Waste Energy
12 Development Company (Zero Waste). In November 2024, Zero Waste asserted that
13 PG&E's action constituted a default and terminated the PPA. PG&E disputed the
14 termination and invoked the PPA's dispute resolution process. PG&E and Zero Waste
15 engaged in settlement discussions concerning the dispute but were unable to reach a
16 resolution. The dispute remains ongoing as of the date of this filing¹⁴³

17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]¹⁴⁴ [REDACTED]
22 [REDACTED]
23 [REDACTED]¹⁴⁵ The dispute

¹⁴¹ PG&E Testimony at 9-1, Table 9-3.

¹⁴² PG&E Testimony at 9-2.

¹⁴³ PG&E Testimony at 9-16.

¹⁴⁴ PG&E Testimony at 9-16.

¹⁴⁵ PG&E Testimony at 9-16.

1 remains ongoing and PG&E is still assessing the outcome of the dispute arising from the
2 November 15 letter.

3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]

14 [REDACTED]¹⁴⁶

15 [REDACTED]
16 [REDACTED]
17 [REDACTED]. The dispute is ongoing and has not been resolved at the time of this filing.

18 **E. Force Majeure Claims**

19 During the Record Period, PG&E administered 18 force majeure (FM) claims.¹⁴⁷
20 Of those, PG&E closed 17 claims. One remains pending. [REDACTED]

21 [REDACTED]
22 [REDACTED]

23 [REDACTED]¹⁴⁸

24 Cal Advocates does not oppose PG&E's actions regarding these FM claims.

¹⁴⁶ PG&E Testimony at 9-16.

¹⁴⁷ PG&E Testimony at 9-40, Table 9-10.

¹⁴⁸ PG&E Testimony at 9-40, Table 9-10.

1 **A. Other Issues**

2 **1. North Fork Community Power, LLC – North Fork**
3 **Community Power Project (PG&E Log No. 33R433BIO)**

4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]

8 Since the dispute remains ongoing, Cal Advocates does not have an evaluation or
9 determination as to whether the dispute has been resolved in compliance with SOC4.

10 **2. Moss Landing Energy Storage 1, LLC – Moss 300**
11 **Project; Moss Landing Energy Storage 2, LLC – Moss**
12 **100 Project; and Moss Landing Energy Storage 3, LLC –**
13 **Moss 350 Project (PG&E Log Nos. 40S013, 40S019, and**
14 **40S032)**

15 On January 16, 2025, a fire occurred at Vistra’s Moss 300 Project, causing damage
16 to the project and to CAISO communication equipment serving the Moss 300, Moss 100,
17 and Moss 350 projects. As a result, all three projects were taken offline.¹⁵⁰

18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

¹⁴⁹ PG&E Testimony at 9-17.

¹⁵⁰ PG&E Testimony at 9-18.

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED] ¹⁵¹
6 [REDACTED]
7 [REDACTED]
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10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED] ¹⁵² [REDACTED]
15 [REDACTED] ¹⁵³

16 In light of CAISO's approval of Vistra's request to retire the Moss 300 Project, Cal
17 Advocates makes no evaluation or determination as to whether the dispute was resolved
18 in compliance with SOC4. Cal Advocates recommends that the review of Moss Landing
19 and the Elkhorn BESS be conducted as part of a future ERRR Compliance proceeding
20 once PG&E has completed the Root Cause Analysis related to the fires and subsequent
21 outages.

22 **3. Placerita ESS, LLC – Canyon Country Energy Storage**
23 **Project (PG&E Log No. 40S039)**

24 [REDACTED]
25 [REDACTED]

¹⁵¹ PG&E Testimony at 9-18.

¹⁵² PG&E Testimony at 9-18.

¹⁵³ PG&E Testimony at 9-19.

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ¹⁵⁴

[REDACTED]

[REDACTED] ¹⁵⁵

[REDACTED]

¹⁵⁴ This case was not included as a FM because it was a bureaucracy delay. Placerita paid the liquidation in full.

¹⁵⁵ PG&E Testimony at 9-19.

1 [REDACTED]
2 [REDACTED]¹⁵⁶
3 Cal Advocates does not oppose PG&E's decision to [REDACTED]

4 **4. Pittsburg RV & Boat Storage, LLC – Pittsburg RV Boat**
5 **Solar Project (PG&E Log No. 33R548RM)**
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
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15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]

20 [REDACTED]¹⁵⁷

21 Since the dispute remains ongoing, Cal Advocates does not have an evaluation or
22 determination as to whether the dispute has been resolved in compliance with SOC4.

23 **IV. CONCLUSION/RECOMMENDATION**

24 Based on this review and analysis of PG&E's contracts and other information
25 provided to support their testimony, Cal Advocates does not contest PG&E's contract
26 administration activities during the 2025 Record Period.

¹⁵⁶ PG&E Testimony at 9-20.

¹⁵⁷ PG&E Testimony at 9-20.

LIST OF ATTACHMENTS FOR CHAPTER 3

#	Attachment	Description
1	Attachment 3.1	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q001
2	Attachment 3.2 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002CONF
3	Attachment 3.3 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch01CONF
4	Attachment 3.4 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch02CONF
5	Attachment 3.5 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch03CONF
6	Attachment 3.6 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch04CONF
7	Attachment 3.7 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch05CONF
8	Attachment 3.8 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch06CONF
9	Attachment 3.9 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch07CONF
10	Attachment 3.10 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch08CONF
11	Attachment 3.11 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch09CONF
12	Attachment 3.12 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch10CONF
13	Attachment 3.13 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch11CONF
14	Attachment 3.14 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch12CONF

#	Attachment	Description
15	Attachment 3.15 (Confidential)	PG&E Response, ERRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch13CONF
16	Attachment 3.16 (Confidential)	PG&E Response, ERRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch14CONF
17	Attachment 3.17 (Confidential)	PG&E Response, ERRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch15CONF
18	Attachment 3.18 (Confidential)	PG&E Response, ERRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch16CONF
19	Attachment 3.19 (Confidential)	PG&E Response, ERRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch17CONF
20	Attachment 3.20 (Confidential)	PG&E Response, ERRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch18CONF
21	Attachment 3.21 (Confidential)	PG&E Response, ERRA-2025-PGE-Compliance_MDR_PGE_EveridgeKA_NonProcurement CONF

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2

1 **CHAPTER 4: REVIEW OF BALANCING AND MEMORANDUM ACCOUNTS**

2 (Witnesses: Brian Lui, Craig Jenquin)

3 **I. INTRODUCTION**

4 This testimony addresses Chapters 5, 11, 12, 13, 15, 16, 18, and 19 of PG&E's
5 2025 ERRA compliance application, which cover the financial activity recorded in the
6 following balancing and memorandum accounts for the Record Period of January 1, 2025
7 through December 31, 2025:

8 A. Chapter 5: Disadvantaged Community – Green Tariff (DAC-GT)
9 Balancing Account (DACGTBA) and Community Solar – Green Tariff
10 (CS-GT) Balancing Account (CSGTBA)

11 B. Chapter 11: Green Tariff Shared Renewables Balancing Account
12 (GTSRBA) and Green Tariff Shared Renewables Memorandum
13 Account (GTSRMA)

14 C. Chapter 12: Portfolio Allocation Balancing Account (PABA)

15 D. Chapter 13: Energy Resource Recovery Account (ERRA)

16 E. Chapter 15: Disadvantaged Community – Single-Family Affordable
17 Solar Homes Balancing Account (DACSASHBA) and Disadvantaged
18 Community – Single-Family Affordable Solar Homes Memorandum
19 Account (DACSASHMA)

20 F. Chapter 16: Central Procurement Entity (CPE) Entries in the
21 Centralized Local Procurement Sub-Account (CLPSA)

22 G. Chapter 18: Modified Transition Cost Balancing Account (MTCBA),
23 Bioenergy Market Adjusting Tariff (BioMAT) Non-Bypassable Charge
24 Balancing Account (BMNBCBA), and Tree Mortality Non-Bypassable
25 Charge Balancing Account (TMNBCBA)

26 H. Chapter 19: New System Generation Balancing Account (NSGBA)

27
28 **II. SUMMARY OF RECOMMENDATIONS**

29 Cal Advocates does not object to the 2025 accounting entries recorded to PG&E's
30 regulatory accounts.

31 **III. ANALYSIS**

32 Cal Advocates reviews PG&E's accounting documentation for the Record Period
33 to determine whether entries recorded in each account were reasonable, appropriate,

1 correctly stated, and compliant with applicable Commission Decisions.¹⁵⁸ Cal

2 Advocates' audit procedures included, but were not limited to, the following:

- 3 • Review of PG&E's application, testimony, workpapers, and data request
4 responses;
- 5 • Review of Balancing and Memorandum Account Electrical Preliminary
6 Statements and associated tariff line-items;
- 7 • Review of applicable advice letters (ALs), resolutions, and Commission
8 Decisions;
- 9 • Sample selection of monthly financial activity recorded to account
10 subledgers to determine the adequacy of supporting documentation;
- 11 • Virtual meetings with PG&E to discuss details of requested
12 documents;¹⁵⁹
- 13 • Reconciliation of PG&E workpapers with General Ledger entries;¹⁶⁰
- 14 • Examination of invoices, journals, general ledger entries;
- 15 • Verification of the mathematical accuracy of accounting worksheets and
16 supporting documentation;
- 17 • Review of proof of payments for invoices selected during the audit
18 process;
- 19 • Review of monthly interest rates and calculation of monthly interest
20 amounts;

¹⁵⁸ Pursuant to the Scoping Ruling in this proceeding, only the ERRA and PABA entries are reviewed to be reasonable, appropriate, accurate, and in compliance with Commission decisions; the remaining accounts are reviewed whether the costs incurred and recorded are reasonable and in compliance with the applicable tariffs and Commission directives.

¹⁵⁹ Between June 9 and 24, 2026, Cal Advocates reviewed judgement samples (a nonrandom sample selected based on the judgment/opinion of the auditor) of accounting entries in virtual audits with PG&E. Auditor assessments of risk include but are not limited to: internal control environment, financial impact, results of prior reviews, changes to accounting practices.

¹⁶⁰ General Ledger entries are recorded by PG&E in SAP accounting software and may also be referred to as "SAP entries" in this testimony.

1 In the remainder of this chapter, Cal Advocates will provide a summary of each
2 account, the recorded entries, and any relevant findings or recommendations for each
3 account.

4 **A. DACGTBA & CSGTBA**

5 **1. Background**

6 The California Public Utilities Commission (CPUC or Commission) issued
7 Decision (D.) 18-06-027 implementing Assembly Bill (AB) 327. AB 327 required the
8 Commission to develop alternatives to increase the adoption and growth of renewable
9 generation in Disadvantaged Communities (DAC). Pursuant to D.18-06-027, PG&E
10 filed Advice Letter (AL) 5351-E to establish the Public Policy Charge Balancing Account
11 (PPCBA) with two subaccounts to track the costs and revenues associated with the DAC-
12 GT and CS-GT programs.¹⁶¹

13 The DACGTBA tracks the annual funding of the program through greenhouse gas
14 (GHG) and public policy revenues compared to costs incurred to implement, operate,
15 maintain, and administer the program.¹⁶²

16 D.24-05-065 ordered the closure of the CSGTBA, which was finalized upon the
17 approval of PG&E's annual DAC-GT and CS-GT budget advice letter (AL) (AL 7554-E)
18 submitted April 1, 2025.¹⁶³ By the end of Q3 2025, PG&E completed its closure of the
19 CSGTBA and transferred the accumulated CSGTBA balance of \$3.4 million in credit to
20 the DACGTBA.

¹⁶¹ PG&E Advice Letter 5351-E available at:
https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_5351-E.pdf. Accessed July 29, 2026.

¹⁶² PG&E Electric Preliminary Statement Part HM, p. 1. Available at:
https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_PRELIM_HM.pdf. Accessed July 29, 2026.

¹⁶³ PG&E Advice Letter 7554-E available at:
https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_7554-E.pdf. Accessed July 29, 2026.

Table 4-1¹⁶⁴ 2025 DACGTBA Expense Activity

#	Description	Amount
1	Renewable Resource Cost	\$168,214
2	DAC-GT Dedicated Resource Costs	\$4,345,086
3	Revenue Shortfall Based on 20% Discount	\$5,978,871
a	DAC-GT Information Technology (IT) (IT/Billing System)	\$62,852
b	Program Management	\$132,701
c	Contract Center Operations	\$3,195
d	Energy Procurement	\$389,138
4 (a+b+c+d)	Administrative Costs	\$587,887
5	Marketing	\$7,908
6	Community Choice Aggregation Costs	\$24,432
7 (1+2+3+4+5+6)	Total DACGT Expense Activity	\$11,112,398

2. Recommendation

Cal Advocates does not recommend accounting adjustments and does not object to the 2025 entries recorded in the DACGTBA.

B. GTSRBA & GTSRMA

1. Background

In Decision (D.) 15-01-051, the Commission required that administrative and marketing costs for the Green Tariff Shared Renewable (GTSR) program be tracked in a memorandum account and be subject to reasonableness review in each investor-owned utility's (IOU) annual ERRA compliance review. Costs that are found to be unreasonable

¹⁶⁴ PG&E Testimony Table 5-1.

cannot be collected from program participants and will be borne by shareholders.

Program startup costs that are found to be reasonable can be amortized.¹⁶⁵

Table 4-2 shows the breakdown of costs for the Green Tariff Shared Renewables Memorandum Account by category.

Table 4-2:¹⁶⁶ GTSRMA Activity in the Record Period

#	Description	Amount
1	Program Management	\$141,983
2	IT/Billing System	\$0
3	Energy Procurement	\$209,967
4	Contact Center Operations	\$34,255
5	Outreach/Marketing	\$2,181
6 (1+2+3+4+5)	Expenses Subtotal	\$388,386
7	Interest	\$212,438
8 (6+7)	Total GTSRMA Expense Activity	\$600,824

The purpose of the GTSRBA is to track revenues received and actual expenses incurred to procure renewable generation resources for customers participating in the GTSR program.¹⁶⁷ Table 4-3 shows the breakdown of expenses and revenues for the Green Tariff Shared Renewables Balancing Account.

¹⁶⁵ D.15-01-051, p. 113.

¹⁶⁶ Table 11-1 in PG&E Testimony at 11-4.

¹⁶⁷ PG&E Electric Preliminary Statement Part GR, p. 1. Available at: https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_PRELIM_GR.pdf. Accessed July 29, 2026.

Table 4-3: GTSRBA Activity in the Record Period¹⁶⁸

#	Description	Amount
1	GTSRBA Beginning Balance	\$15,720,796
2	Billed Revenues	\$(37,380,677)
3	Net Expenses – GT Subaccount	\$37,021,033
4	Interest	\$515,569
5	Net Activity – ECR Subaccount	\$(7,550,448)
6 (2+3+4+5)	Total GTSRBA Activity	\$(7,394,523)
6 (1+6)	GTSRBA Ending Balance	\$8,326,273

2. Recommendation

Cal Advocates does not recommend accounting adjustments and does not object to the 2025 entries recorded in the GTSRBA and GTSRMA.

C. PABA

1. Background

D.18-10-019, issued in the Power Charge Indifference Adjustment (PCIA) Rulemaking (R.)17-06-026, significantly modified the accounting for the PCIA by requiring that PCIA revenues from customers and costs be trued-up on an annual basis.¹⁶⁹ Pursuant to D.18-10-019 Ordering Paragraph 7, the IOUs were required to establish the PABA, a two-way cost balancing account with subaccounts for each vintaged portfolio including categories for billed revenues, generation resource costs, net California Independent System Operator (CAISO) market revenues associated with energy and ancillary services, and revenues associated with the renewable energy Adder and the

¹⁶⁸ Derived from Table 11-4 in PG&E's testimony at 11-11.

¹⁶⁹ D.18-10-019, Ordering Paragraph 6.

1 Resource Adequacy capacity. Pursuant to D.18-10-019 Ordering Paragraph 8, each
2 utility was required to modify its ERRA balancing account and any other balancing
3 accounts, as necessary, to be consistent with the PABA vintaged subaccount structure
4 adopted in D.18-10-019.

5 PG&E submitted AL 5440-E to implement the changes in D.18-10-019.¹⁷⁰ The
6 Commission approved PG&E Advice Letter 5440-E on May 3, 2019, with an effective
7 date of January 1, 2019. PG&E Advice Letter 5440-E established the PABA, and
8 updated the ERRA balancing account, Modified Transition Cost Balancing Account
9 (MTCBA) and Utility Owned Balancing Account (UGBA) to be consistent with the
10 PABA.

11 The purpose of the PABA is to record the above-market costs for all generation
12 resources eligible for recovery through PCIA rates.¹⁷¹ The PCIA is recovered from both
13 bundled and departing load customers. The PCIA assigns costs responsibility for
14 vintages of generation resources based upon when the customer departed bundled service.
15 The PABA is comprised of subaccounts for each year's vintage portfolio that records the
16 costs and revenues associated with the categories of activity for all generation resources
17 executed or approved by the Commission for cost recovery that year.

18 D.22-01-023, issued in the PCIA Rulemaking (R.17-06-026), requires that IOUs
19 transfer the year-end balance of the ERRA to the most recent vintage subaccount of the
20 PABA following approval of a Tier 2 AL.¹⁷²

21 Activity recorded to the PABA include the following categories: Revenues from
22 Customers; Renewable Portfolio Standard (RPS) Activity; Resource Adequacy (RA)
23 Activity; Adopted Utility Owned Generation (UOG) Revenue Requirements; CAISO

¹⁷⁰ PG&E Advice Letter 5440-E. Available at:
https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_5440-E.pdf. Accessed July 29, 2026.

¹⁷¹ PG&E Electric Preliminary Statement Part HS, p. 1. Available at:
https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_PRELIM_HS.pdf. Accessed July 29, 2026.

¹⁷² D.22-01-023, Ordering Paragraph 4.

1 Related Charges and Revenues, Fuel Costs, Contract Costs, GHG costs, and
2 Miscellaneous costs.¹⁷³

3 ***Table 4-4: PABA Activity in the Record Period¹⁷⁴***

#	Description	Amount
1	PABA Beginning Balance – 1/1/2025	
2	2025 Net PABA Revenues	
a	UOG Costs	
b	Fuel & Contract Costs	
c	RA Costs and Revenues	
d	RPS Costs and Revenues	
e	ISO Costs and Revenues	
f	Other Expenses	
3 (a+b+c+d+e+f)	2024 Net PABA Expenses	
4 (2+3)	PABA Net Activity Before Interest	
5	PABA Net Interest	
6 (1+4+5)	PABA Ending Balance – 12/31/2024	

4

5 Cal Advocates' PABA audit sample included reviews of 30 tariff line-items.

6 Sample entries were selected using a combination of auditor judgment, risk-based

7 assessment of dollar value, and risk-based assessment of supporting information.

¹⁷³ PG&E Testimony at page 12-2.

¹⁷⁴ Derived from PG&E Table 12-8 at 12-29-31.

1 **2. Recommendation**

2 Cal Advocates does not recommend accounting adjustments and does not object to
3 the 2025 entries recorded in the PABA.

4 **D. ERRA**

5 **1. Background**

6 Pursuant to D.02-10-062, D.02-12-074 and Public Utilities Code Section
7 454.5(d)(3), the purpose of the ERRA balancing account was to account for the actual
8 ERRA revenues and electric procurement costs for revenue recovery. The ERRA
9 balancing account was substantially modified by D.18-10-019, issued in the PCIA
10 rulemaking, R.17-06-026. D.18-10-019 ordered the implementation of the PABA and
11 included revisions to the ERRA balancing account. The revised ERRA records power
12 procurement costs applicable solely to PG&E's bundled customers.¹⁷⁵ Power
13 procurement costs incurred on behalf of both bundled and departing load customers are
14 recorded either in the PABA, the Modified Transition Cost Balancing Account, the New
15 System Generation Balancing Account (NSGBA), the Tree Mortality Non-Bypassable
16 Charge Balancing Account, the Public Purpose Charge Balancing Account (PPCBA) or
17 the Bioenergy Market Adjusting Tariff (BioMAT) Non-bypassable Charge Balancing
18 Account.¹⁷⁶

¹⁷⁵ PG&E Preliminary Statement Part CP at 1. Available at:
https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_PRELIM_CP.pdf. Accessed July 29, 2026.

¹⁷⁶ PG&E Direct Testimony at 13-1, Lines 19-23 and Footnote 2.

Table 4-5: ERRA Activity in the Record Period¹⁷⁷

#	Description	Amount (\$)
1	ERRA Beginning Balance – 1/1/2025	
2	Net Revenues	
a	UOG Costs	
b	Contract & Fuel Costs	
c	ISO Costs & Revenues	
d	RA Expenses	
e	RPS Expenses	
f	GTSR Expenses	
g	Other Expenses	
3 (a+b+c+d+e+f+g)	2025 Net ERRA Expenses	
4 (2+3)	ERRA Net Activity Before Interest ¹⁷⁸ - 2025 YTD	
5	ERRA Net Interest	
6 (1+4+5)	ERRA Ending Balance	
7	PCIA ¹⁷⁹ Subaccount Beginning Balance	
8	PCIA Subaccount Net Activity – FY 2024 YTD	

¹⁷⁷ Derived from PG&E Table 13-2, at 13:9-11.

¹⁷⁸ Amount includes ERRA Revenues (credit) totaling \$(4,106,627,539) and ERRA Net Costs and Expenses (debit) totaling \$2,881,711,077.

¹⁷⁹ Power Charge Indifference Adjustment.

#	Description	Amount (\$)
9 (7+8)	PCIA Subaccount Ending Balance	
10 (6+9)	Total ERRA Ending balance – 12/31/2025	

2. Recommendation

Cal Advocates does not recommend accounting adjustments and does not object to the 2025 entries recorded in the ERRA.

E. DACSASHBA & DACSASHMA

1. Background

AB 327 required the Commission to develop alternative programs to increase the adoption and growth of renewable generation in disadvantaged communities. D.18-06-027 adopted the Disadvantaged Community – Single-Family Affordable Solar Housing (DAC-SASH) Program, along with the Disadvantaged Community Green Tariff (DAC-GT) and Community Solar Green Tariff (CS-GT) programs.

Pursuant to Ordering Paragraph 8 of D.18-06-027, the DAC-SASH Program has an annual budget of \$10 million per year beginning on January 1, 2019, and continuing through the end of 2030 and will collect those costs first through available GHG allowance proceeds.¹⁸⁰ If GHG funds are exhausted, the DAC-SASH program will be funded through the Public Purpose Charge rate component. PG&E's proportionate share of the \$10 million per year is 43.7 percent, or \$4.37 million per year.¹⁸¹ The DACSASHBA is a subaccount of the Public Policy Charge Balancing Account. The DACSASHBA records PG&E and third-party program administration expenses and incentives for completed projects.

¹⁸⁰ D.18-060-027 available at: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M216/K789/216789285.PDF>. Accessed July 29, 2026.

¹⁸¹ D.18-06-027, Appendix A, at. A-6.

The DACSASHMA was established to track all incremental start-up costs incurred to implement the DAC-SASH program. All start-up costs were requested and approved in the 2019 ERRA Compliance decision.¹⁸² PG&E has closed the DACSASHMA pursuant to D.25-06-045.¹⁸³

Table 4-6: DACSASHBA Expense Activity in the Record Period¹⁸⁴

#	Description	Amount (\$)
1	PG&E Program Management	\$ 50,892
2	Independent Evaluation Contract Expenses	\$ 87,679
3	Marketing	\$ 4,400
4	Program Administrator Expenses	\$ 614,515
5	Interest	\$ (214,400)
6	Incentives	\$ 3,285,462
7 (1+2+3+4+5+6)	Total DACSASHBA Expense Activity	\$ 3,828,548

2. Recommendation

Cal Advocates does not recommend accounting adjustments and does not object to the 2025 entries recorded in the DACSASHBA.

F. Central Procurement Entity Entries To The Clpsa

1. Background

The Commission issued D.20-06-002 on June 17, 2020 ordering PG&E to serve as the Central Procurement Entity (CPE) for PG&E's distribution service area for the multi-

¹⁸² D.21-07-013 available at: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M393/K334/393334096.PDF>. Accessed July 29, 2026.

¹⁸³ D.25-06-045 at 33 and Ordering Paragraph 7.

¹⁸⁴ PG&E Table 15-1 at 15-2.

year local RA program beginning for the 2023 RA compliance year.¹⁸⁵ D.20-06-002 directed PG&E to submit the administrative costs in the ERRA forecast and compliance proceedings.¹⁸⁶

The Commission approved PG&E AL 5919-E, effective September 16, 2020,¹⁸⁷ which established the CLPSA as a sub-account of the NSGBA. The CPE administrative costs are among other costs outlined in the CLPSA. PG&E's 2025 ERRA Compliance testimony Chapter 16 deals solely with the CPE administrative costs in the CLPSA.

Table 4-7: PG&E CPE Administrative Costs in the Record Period¹⁸⁸

#	Description	Amount (\$)
1	CPE Implementation Team Cost	\$ 1,026,761
2	CPE Supporting Functions Costs	\$ 872,702
3	IE Cost	\$ 83,981
4 (1+2+3)	Total CPE Activity	\$ 1,983,444

2. Recommendation

Cal Advocates does not recommend accounting adjustments and does not object to the 2025 entries recorded in the CPE sub-account of the NSGBA.

G. MTCBA, BMNBCBA, & TMNBCBA

1. Background

H. MTCBA

The MTCBA records ongoing transition costs associated with procurement and other authorized costs defined by Public Utilities Code Section 367(a)(1)-(6).¹⁸⁹ D.05-

¹⁸⁵ D.20-06-002, p. 91, Ordering Paragraph 2.

¹⁸⁶ D.20-06-002, p. 55-56.

¹⁸⁷ PG&E AL 5919-E available at: https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_5919-E.pdf. Accessed July 29, 2026.

¹⁸⁸ PG&E Opening Testimony, Table 16-1 at 16-2.

¹⁸⁹ PG&E Preliminary Statement CQ at 1. Available at:

1 12-045 established the ongoing Competition Transition Charge (CTC) calculation
2 methodology¹⁹⁰ and D.06-12-018 authorized PG&E to consolidate CTC subaccounts for
3 various departing load customer groups into a single account.¹⁹¹ The MTCBA tracks
4 actual above-market CAISO expenses and revenues and imputed revenues for Renewable
5 Energy Credit (REC) and RA attributes, pursuant to D.18-10-019.¹⁹² The MTCBA
6 records revenues from the ongoing CTC rate component from bundled, Direct Access
7 (DA), Community Choice Aggregator (CCA), Municipal Departing Load (MDL), and
8 Customer Generation Departing Load (CGDL) customers.¹⁹³ The MTCBA records
9 contract costs associated with Qualifying Facilities (QF) obligations from CTC small and
10 large QFs, and MCP QFs contracts executed before December 20, 1995.¹⁹⁴

11 ***Table 4-8: MTCBA Activity in the Record Period¹⁹⁵***

#	Description	Amount (\$)
1	MTCBA Beginning Balance – 1/1/2025	
2	2025 Net MTCBA Revenue	
a	Contract Costs	
b	Net CAISO Costs and Revenues	
c	RPS Costs and Revenues	
d	RA Costs and Revenues	
3	2025 Net MTCBA Expenses	
(a+b+c+d)		

https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_PRELIM_CQ.pdf. Accessed July 29, 2026.

¹⁹⁰ D.05-12-043, OP 6 at 29.

¹⁹¹ D.06-12-018, OP 7 at 17.

¹⁹² D.18-10-019 Conclusions of Law 3 & 4 at 156, and Appendix 1.

¹⁹³ PG&E Testimony at 18-2, Lines 5 - 7.

¹⁹⁴ PG&E Testimony at 18-2, Lines 8-11.

¹⁹⁵ Derived from PG&E Table 18-1 workpaper.

#	Description	Amount (\$)
4 (2+3)	MTCBA Net Activity Before Interest	
5	MTCBA Net Interest	
6 (1+4+5)	MTCBA Ending Balance – 12/31/2025	

I. BNBCBA

PG&E AL 5966-E established the BioMAT Non-bypassable Charge Balancing Account (BNBCBA) in October 2020.¹⁹⁶ The purpose of the BNBCBA is to record and recover net costs of PG&E's BioMAT contracts in compliance with Senate Bill (SB) 1122¹⁹⁷ and D.20-08-043.¹⁹⁸ The BNBCBA records procurement costs, CAISO resource revenues, CCA BioMAT Program costs, and Retained RPS and Retained RA valued at the latest market price benchmark.¹⁹⁹ The BNBCBA is recovered through the BioMAT non-bypassable Public Purpose Program (PPP) rate component using rate design authorized in D.20-08-043.²⁰⁰

¹⁹⁶ PG&E AL 5966-E available at: https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_5966-E.pdf. Accessed July 29, 2026.

¹⁹⁷ Rubio 2012.

¹⁹⁸ PG&E Preliminary Statement IJ at 1. Available at: https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_PRELIM_IJ.pdf. Accessed July 29, 2026.

¹⁹⁹ PG&E Testimony at 18-3, Lines 19-22.

²⁰⁰ PG&E Testimony at 18-3, Lines 22-24.

Table 4-9: BNBCBA Activity in the Record Period²⁰¹

#	Description	Amount (\$)
1	BNBCBA Beginning Balance – 1/1/2025	
2	2025 Net BNBCBA Revenue	
a	Contract Costs	
b	RPS Costs and Revenues	
c	RA Costs and Revenues	
d	Other Expenses	
3	2025 Net BNBCBA Expenses	
(a+b+c+d)		
4 (2+3)	BNBCBA Net Activity Before Interest	
5	BNBCBA Net Interest	
6 (1+4+5)	BNBCBA Ending Balance – 12/31/2025	

J. TMNBCBA

On December 21, 2018, the Commission issued D.18-12-003 to establish a non-bypassable charge associated with tree mortality procurement. PG&E subsequently filed AL 5478-E to establish the TMNBCBA, which recovers electric procurement costs of Power Purchase Agreements (PPA) related to Tree Mortality in compliance with Senate Bill (SB) 859 and Resolutions E-4770 and E-4805, defined in D.18-12-003.²⁰² The TMNBCBA records contract costs, CAISO resource revenues, and Retained RPS and Retained RA valued at the latest market price benchmark. The TMNBCBA is recovered

²⁰¹ Derived from PG&E Table 18-2 worksheet.

²⁰² PG&E AL 5478-E available at: https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_5478-E.pdf. Accessed July 29, 2026.

through the Tree Mortality non-bypassable Public Purpose Program (PPP) rate component.

Table 4-10: TMNBCBA Activity in the Record Period²⁰³

#	Description	Amount (\$)
1	TMNBCBA Beginning Balance – 1/1/2025	
2	2025 Net TMNBCBA Revenue	
a	Contract Costs & CAISO Revenues	
b	RPS Costs and Revenues	
c	RA Costs and Revenues	
d	Other Expenses	
3 (a+b+c+d)	2025 Net TMNBCBA Expenses	
4 (2+3)	MTCBA Net Activity Before Interest	
5	TMNBCBA Net Interest	
6 (1+4+5)	TMNBCBA Ending Balance – 12/31/2025	

1. Recommendation

Cal Advocates does not recommend accounting adjustments and does not object to the 2025 entries recorded in the MTCBA, BNBCBA, and TMNBCBA.

K. NSGBA

1. Background

The NSGBA was authorized by the Commission in D.10-12-035, established through AL 3922-E, and become operational on January 1, 2012. The NSGBA records the costs and benefits of Power Purchase Agreements (PPAs) allocated by the

²⁰³ PG&E Table 18-3 at 18-8.

Commission to all customers including bundled service, DA, and CCA customers.²⁰⁴ The NSGBA includes subaccounts for specific PPAs and categories of generation resources. The NSGBA is recovered through the New System Generation Charge (NSGC) rate component applicable to bundled, DA, and CCA customers. The NSGBA includes subaccounts for specific PPAs and categories of generation resources. The NSGBA is recovered through the New System Generation Charge (NSGC) rate component applicable to bundled, DA, and CCA customers.

Table 4-11: NSGBA Activity in the Record Period²⁰⁵

#	Description	Amount (\$)
1	NSGBA Beginning Balance – 1/1/2025	
2	2025 Net NSGBA Revenue	
a	Net Resource Subaccount Expenses	
b	Net CLPSA Expenses	
c	Summer Reliability RA Transfers	
d	Other Expenses	
3	2025 Net NSGBA Expenses	
4 (2+3)	NSGBA Net Activity Before Interest	
5	NSGBA Net Interest	
6 (1+4+5)	NSGBA Ending Balance – 12/31/2025	

²⁰⁴ PG&E Preliminary Statement FS at 1. Available at: https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_PRELIM_FS.pdf. Accessed July 29, 2026.

²⁰⁵ PG&E Table 19-1 at 19:11-12.

1 **2. Recommendation**

2 Cal Advocates does not recommend accounting adjustments and does not object to
3 the 2025 entries recorded in the NSGBA.

4 **IV. CONCLUSION**

5 Cal Advocates does not object to the 2025 accounting entries recorded in PG&E's
6 regulatory accounts.

1 **CHAPTER 5: CHAPTER 5: RESOURCE ADEQUACY**

2 (Witness: Karl Dunkle Werner)

3 **I. INTRODUCTION AND SUMMARY**

4 This chapter presents Cal Advocates' review of PG&E's resource adequacy (RA)
5 procurement and sales activities for the Record Period from January 1, 2025, through
6 December 31, 2025. Cal Advocates' review focuses on PG&E's compliance with its
7 Bundled Procurement Plan (BPP) in its efforts to meet RA requirements established by
8 the Commission.

9 **II. RECOMMENDATIONS**

10 Cal Advocates recommends the Commission clarify expectations around the
11 IOU's compliance with RA showings, sales, and unsold volumes. Cal Advocates also
12 recommends the Commission investigate what causes volumes to remain unsold during
13 peak months. Specifically, Cal Advocates recommends the Commission clarify that
14 PG&E is expected to make a good faith effort to sell the RA volumes it is authorized to
15 sell under its BPP, at least in peak months.

16 **III. BACKGROUND**

17 The Commission requires all LSEs to satisfy system and flexible RA requirements
18 on a year-ahead and month-ahead basis. For the 2025 year-ahead obligation, PG&E
19 received its final requirement level in September 2024 and submitted its compliance
20 filing in October 2024.²⁰⁶ For the 2025 month-ahead obligations, PG&E was required to
21 file 45 days before the beginning of each month.²⁰⁷ LSEs, including PG&E, comply with
22 Commission and California Independent System Operator (CAISO) RA requirements and
23 obligations through RA supply plan showings. LSEs must meet 90% of their year-ahead
24 system and flexible RA requirements by October 31 of each year, and 100% of their

²⁰⁶ PG&E Testimony at 8-2.

²⁰⁷ Commission, *2025 RA Filing Due Dates*, September 13, 2024. Available at:
<https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/resource-adequacy-compliance-materials/2025-ra-filing-due-dates.docx>.

1 monthly RA requirements 45 days prior to the compliance month.²⁰⁸ For 2025, Central
2 Procurement Entities (CPEs) are responsible for procurement of all local RA
3 requirements in the PG&E service territory; LSEs in the territory are no longer required
4 to satisfy local RA obligations.²⁰⁹ The PG&E CPE is a separate entity whose
5 procurement activities are walled off from the procurement activities of PG&E-as-
6 LSE.²¹⁰ The PG&E CPE solicitation and other CPE responsibilities in the Record Period
7 were previously reviewed outside of the ERRA process and were not opposed by Cal
8 Advocates.²¹¹

9 Decision (D.) 21-02-028 established an “Effective Planning Reserve Margin”
10 (EPRM) that set non-binding procurement targets which authorize investor-owned
11 utilities (IOUs) to procure RA and non-RA supply beyond their RA requirements for
12 certain months.²¹² This decision was extended by D.23-06-029 and D.25-06-048.
13 PG&E’s EPRM targets for 2025 were 765 to 1,440 megawatts (MW) from June to
14 October.²¹³

²⁰⁸ Commission, *2025 Resource Adequacy and Slice of Day Guide*, March 7, 2025, at 10. Available at: <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/resource-adequacy-compliance-materials/guides-and-resources/2025-ra-slice-of-day-filing-guide1-32725.pdf>. See also PG&E Testimony at 8-2 to 8-3.

²⁰⁹ LSEs are allocated costs of CPE procurement of local RA based on load-share with other adjustments like self-shown procurement by LSEs. LSEs within the San Diego Gas & Electric Company service territory are not served by a CPE and comply with local RA requirements individually. D.20-06-002, Ordering Paragraph 3.

²¹⁰ D.20-06-002, *Decision on Central Procurement of the Resource Adequacy Program*, June 11, 2020 at Ordering Paragraph 25 at 99-100. Available at: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M340/K671/340671902.PDF>.

²¹¹ PG&E AL 7704-E, *Pacific Gas and Electric Company Central Procurement Entity 2025 Annual Compliance Report*, September 19, 2025.

²¹² D.21-12-015, *Phase 2 Decision Directing Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company to Take Actions to Prepare for Potential Extreme Weather in the Summers of 2022 and 2023*, December 2, 2021 at Ordering Paragraph 3 at 160-161. <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M428/K821/428821475.PDF>.

²¹³ D.23-06-029, Ordering Paragraph 7 at 137.

1 **IV. DISCUSSION AND ANALYSIS**

2 **A. Summary of RA Requirements and PG&E's Positions in the**
3 **Record Period**

4 Outside of the present testimony, PG&E reported its RA position on a quarterly
5 basis in its Quarterly Compliance Report (QCR) filings which were timely filed
6 throughout the Record Period.²¹⁴ PG&E also briefed Cal Advocates and other non-
7 market stakeholders on their RA position, sales, and purchases at Procurement Review
8 Group (PRG) meetings. PG&E's BPP establishes conditions for both QCR and PRG
9 filing and reporting requirements.²¹⁵

10 Cal Advocates reviewed PG&E's RA compliance filings and found that PG&E
11 was compliant with its system and flexible RA requirements. Table 5-1 provides
12 PG&E's month-ahead (MA) system RA requirements, RA showings, and resulting
13 compliance position. These requirements and showings exclude the EPRM values; these
14 are summarized separately in the second-from-right column of Table 5-1. The RA
15 requirements also exclude the excess energy required to charge storage, though that
16 volume is relatively low in the peak hours shown in the table. This table includes data
17 from the "RA Tracker",²¹⁶ an Excel workbook that records PG&E's RA capacity
18 available and disposition (sold, use, outage, unsold). The RA Tracker also describes
19 valuation and PG&E's proposed allocation to specific balancing accounts.

²¹⁴ QCRs describing activities in the 2025 Record Period include PG&E Advice Letters (AL): 7583-E, 7583-E-A, 7659-E, 7659-E-A, 7746-E, 7824-E, and 7824-E-A.

²¹⁵ Attachment 5.1 – PG&E BPP, Table 4, at 39-42.

²¹⁶ Attachment 5.2, response to Master Data Request question 1.3.18 (RA Tracker).

Table 5-1: PG&E's 2025 System RA Compliance (peak hour MW)²¹⁷

2025	Peak hour MW			NQC MW		
	Requirement and allocations	Shown for compliance	Difference	Shown for compliance	Shown for EPRM	Unsold
Jan	4,100	4,685	584	5,480		3,478
Feb	3,904	4,257	353	5,109		2,491
Mar	4,421	4,886	465	5,228		1,145
Apr	5,012	5,327	315	5,367		715
May	6,371	6,683	312	6,709		1,311
Jun	8,529	8,642	113	9,763	617	685
Jul	9,231	9,369	138	11,018	4	192
Aug	8,198	9,017	819	8,992	497	369
Sep	8,973	9,021	48	10,095	39	1
Oct	6,624	6,801	178	6,804	70	520
Nov	4,965	5,122	157	5,720		764
Dec	5,073	5,232	159	6,026		3,434

In a small number of cases, the values reported in PG&E's RA Tracker did not match the values reported in their MA RA filings. These mismatches could include resources reported in one but not the other, or resources reported in both, but at different quantities. Table 5-2 below lists these cases. On net, PG&E's MA filings showed a NQC [REDACTED]

²¹⁷ Attachment 5.6, Monthly SOD Showings and Requirements, at tab "table5-1". Values under the "Peak hour MW" heading show PG&E's peak requirement hour of the month and slice-of-day-accredited RA shown during that peak hour, which does not necessarily align with system peak hour. Values under the "NQC MW" heading show capacity denominated in net qualifying capacity (NQC) MW. "System RA" refers to the system RA obligation and resources that are shown to meet it, including resources that have flexible RA or local RA attributes.

1 **Table 5-2: Differences between PG&E's 2025 RA Tracker and MA Filings²¹⁸**

Type of mismatch	Month	Resource ID	RA Tracker (NQC MW)	MA Filing (NQC MW)	Difference	Notes
Mismatch in MW values	6	DIABLO 7 UNIT 2	924	1,140	216	Difference reported as unsold
Mismatch in MW values	5	DIXNLD 1 LNDFL	0	1	1	Reported as "No capacity available" in RA Tracker
Mismatch in MW values	5	GATWAY 2 PL1X3	393	371	-22	
Mismatch in MW values	6	PCG2 MALIN500 I F XXXX11	340	265	-75	These rows are unspecified imports
Mismatch in MW values	6	PCG2 NOB I F XXXX11	150	100	-50	
In RA Tracker but not MA filing	6	PCG2 MDWP I F XXXX11	20			
In RA Tracker but not MA filing	5	PCG2 PVWEST I F XXXX11	10			
In RA Tracker but not MA filing	6	PCG2 PVWEST I F XXXX11	100			

2

3 **B. Compliance with BPP RA Purchase and Sales Rules**

4 **1. PG&E's Individual RA Transactions**

5 PG&E's RA purchases and sales in the Record Period were appropriately
6 submitted to the Commission in QCRs for review. Cal Advocates reviewed QCRs as
7 they were issued and did not object to RA procurement recorded in those QCRs. PG&E
8 does not seek approval of any RA purchases or sales in its 2025 ERRRA Compliance
9 Application though it provided copies of its QCRs for informational purposes.²¹⁹

²¹⁸ Attachment 5.6 at tab "table5-2".

²¹⁹ PG&E Testimony at 8-6.

1 **2. PG&E's RA Purchases and Sales to Manage RA**
2 **Compliance**

3 PG&E conducts RA purchases as needed to satisfy its Commission RA
4 requirement obligations.²²⁰ For RA sales, PG&E generally sets monthly sales volume

5 [REDACTED]

6 [REDACTED],²²¹ [REDACTED],²²² [REDACTED]

7 [REDACTED].²²³ Essentially, PG&E's BPP-approved approach to sales volume

8 [REDACTED]

9 [REDACTED].

10 Ratepayers benefit through the sale of any RA volumes beyond what PG&E needs
11 for compliance purposes, since sales result in revenue that partially offsets ratepayer
12 costs. Furthermore, these sales increase the overall supply of RA in the market, which
13 puts downward pressure on RA prices for all LSEs. RA supply volumes held by PG&E
14 above what PG&E needs for compliance provides minimal value to ratepayers.²²⁴

15 PG&E's RA compliance filings showed monthly RA supply volumes [REDACTED]
16 [REDACTED] 2025 (see details in Table 5-1).

17 Surplus RA showings in June–October are one means of following the EPRM
18 program implemented by D.21-12-015 and extended by D.23-06-029 and D.25-06-
19 048.²²⁵ Those showings, along with non-RA contributions, exceeded PG&E's minimum

²²⁰ Attachment 5.1 at 274. See also PG&E Testimony on positions and sales at 8-5 to 8-6.

²²¹ [REDACTED]
[REDACTED] Attachment 5.1 at 277.

²²² [REDACTED]
[REDACTED] Attachment 5.1 at 277.

²²³ Attachment 5.1 at 278.

²²⁴ Surplus RA volumes may be offered to CAISO for Cost Procurement Mechanism services which would provide additional revenue. Additionally, surplus RA may be retained to substitute a PG&E RA resource that goes on outage, or for sale to another LSE or generator experiencing an RA resource outage; either instance gives value for RA through avoided costs or sale. These conditions require that surplus RA not be shown on Commission or CAISO RA supply plans to ensure the RA capacity is not obligated to be shown to the CAISO integrated forward market or real-time market.

²²⁵ PG&E's 2025 EPRM report is publicly available at: <https://www.cpuc.ca.gov/-/media/cpuc->

1 target (765 MW) in June 2025, but not the other months. No month exceeded the
2 maximum target of 1,440 MW.²²⁶ There is no penalty or consequence for an IOU failing
3 to meet minimum EPRM targets.

4 PG&E's MA RA compliance filings showed [REDACTED]
5 [REDACTED] (see Table 5-1 above). In cases where PG&E shows more RA to the
6 Commission than needed, ratepayers would benefit from PG&E selling the RA that is not
7 required for compliance, instead of retaining those excess volumes.

8 In addition to these shown RA volumes, PG&E [REDACTED] unsold RA
9 [REDACTED]
10 [REDACTED]. PG&E had [REDACTED]
11 [REDACTED].²²⁷ These
12 volumes [REDACTED] than in 2024. [REDACTED]
13 [REDACTED] than in 2024. Cumulatively, there was [REDACTED]
14 [REDACTED] outside of December²²⁸).

15 [REDACTED] RA outage volumes [REDACTED],
16 [REDACTED] outside of December).

17 The balance on the other side of these [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]

21 PG&E failing to sell [REDACTED]
22 [REDACTED]
23 [REDACTED]

website/divisions/energy-division/documents/resource-adequacy-homepage/resource-adequacy-compliance-materials/excess-resources-reports/pge_oct25_excess.xlsx.

²²⁶ PG&E Testimony at 8-4.

²²⁷ Attachment 5.2 at Results Summary.

²²⁸ See discussion of changes in outage accounting that affected December 2025 in section VII.A below.

A different view of PG&E's RA portfolio is described in the Resource Adequacy Portfolio Breakdown.²²⁹ A modified version of that table is reproduced in Table 5-3 below. The first columns correspond to the categories PG&E describes in its BPP Appendix S.²³⁰ The "Excess" column calculates the system RA volume that would be eligible for sale under the procedure described in the BPP. The Resource Adequacy Portfolio Breakdown includes one additional column labeled [REDACTED] that is not present in the BPP. This table does not describe PG&E's showings; the Excess column does not account for volumes shown for EPRM. [REDACTED]

Table 5-3: PG&E's 2025 Resource Adequacy Portfolio Breakdown

NQC MW							
2025	System RA Minimum Available Capacity	System RA Requirement	Portfolio Reserves	Operational Constraints	System Existing RA Sales	Excess	Committed for Compliance
Jan	9,077	-4,492	-22	0	-75	4,488	-1,010
Feb	8,532	-4,305	-22	0	-884	3,321	-831
Mar	6,915	-4,327	-22	0	-494	2,072	-927
Apr	6,282	-5,364	-27	0	-130	761	-48
May	8,202	-6,623	-33	-17	-50	1,479	-168
Jun	10,822	-8,614	-43	0	-251	1,914	-1,847
Jul	12,459	-9,267	-46	0	-1,114	2,032	-1,844
Aug	10,595	-8,484	-42	0	-1,089	980	-1,109
Sep	11,682	-8,961	-45	0	-1,424	1,252	-1,290
Oct	7,475	-6,863	-34	0	-59	519	-70
Nov	6,591	-5,171	-26	0	-57	1,337	-574
Dec	9,419	-5,231	-26	0	-65	4,097	-814

²²⁹ PG&E, *Resource Adequacy Portfolio Breakdown*, December 31, 2025. Available in the PG&E Testimony workpapers at: QCR ARB CONF Workpapers.zip/QCR ARB CONF-CPUC ONLY/Q4 2025/Supplemental Confidential Attachments/Atch2-Revised_RA_Breakdown_Q4_2025-CLEAN-CONF.docx.

²³⁰ Attachment 5.1 at 276-278.

1 **3. PG&E’s Solicitation Conduct**

2 PG&E’s BPP requires that PG&E must follow certain designs and conduct for
3 solicitations of sales and purchases of RA products, and for criteria for transactions to be
4 approved through the BPP’s QCR process. With certain exceptions, PG&E may enter
5 into contracts if the duration of the contract term is less than five years.²³¹ PG&E may
6 use the QCR process for review and approval of those RA contracts.²³² The BPP
7 includes additional standards for RA sales specifically, including [REDACTED]

8 [REDACTED]
9 [REDACTED].²³³

10 The BPP authorizes RA transactions using broker markets, bilateral outreach, and
11 competitive solicitations.²³⁴ PG&E conducted five RA solicitations in the Record Period
12 as noted in PG&E’s testimony, these are recorded in Table 5-4 below.

13 **Table 5-4: PG&E’s RA Solicitation Schedule²³⁵**

Solicitation	Delivery Term	Date
Q2 through Balance of Year 2025	Monthly, through December 2025	January 2025
Q3 through Balance of Year 2025	Monthly, through December 2025	April 2025
Q4 through Balance of Year 2025	Monthly, through December 2025	July/August 2025
All of 2026	Monthly, January through December 2026	Q3 2025
February through Balance of Year 2026	Monthly, February through December 2026	November 2025

14
15

²³¹ Exceptions related to RA procurement exist for certain contracts with Qualifying Facilities or Combined Heat and Power resources. Attachment 5.1 Table 5, at 46-47.

²³² See Attachment 5.1 Table 5, at 46-47.

²³³ Attachment 5.1 at 273-293.

²³⁴ Attachment 5.1 at 17.

²³⁵ PG&E Testimony at 8-9, recapitulating Table 8-1.

1 **4. Review of PG&E Evaluation of Solicited Offers**

2 Cal Advocates reviewed solicitation files provided to the PRG as well as in QCRs
3 to determine if PG&E acted in accordance with its BPP. RA volumes were offered for
4 sale to parties for all months, including the Effective PRM program for June to October
5 compliance months.²³⁶ Cal Advocates did not protest any of the QCRs that recorded
6 these RA sales.

7 **5. Independent Evaluator Reporting**

8 The BPP requires PG&E to retain an Independent Evaluator (IE) to meet
9 monitoring, evaluation, and reporting requirements associated with any electronic
10 solicitations and Requests for Offers (RFOs) for certain products, including RA sales and
11 some types of RA purchases.²³⁷ PG&E’s BPP explicitly requires that the IE report on
12 “the solicitation, evaluation, and selection processes” associated with RA sales and
13 “RPS-eligible contracts arising from bilateral negotiations...”²³⁸ The BPP also states that
14 “any required IE Report shall be included with the [QCR], Advice Letter or Application
15 seeking approval for the specific transaction.”²³⁹

16 For each report in this Record Period, PA Consulting was the IE. PA Consulting
17 noted no issues with PG&E’s outreach, conduct, or ranking of offers. PA Consulting
18 reviewed PG&E’s bid evaluation methodology [REDACTED]

19 [REDACTED]
20 [REDACTED]

²³⁶ If an IOU has not met its minimum Effective PRM target using RA resources for June and October, it may use its existing RA portfolio to meet the minimum target “provided it has made reasonable attempts to sell this excess capacity to other Load Serving Entities.” For July through September, excess resources may be used to meet the maximum Effective PRM target so long as the same reasonable attempts to sell excess capacity had been made. D.21-12-015 Ordering Paragraphs 72 and 73.

²³⁷ IEs are retained for RFOs that consider utility affiliate or utility-owned generation bids, solicitation of supply-side products that last over two years, Long-Term RFOs seeking products for five years or greater in duration, RPS-eligible resource procurement, cost allocation mechanism (CAM) -eligible resource transactions, energy storage products, and any RA sales. Attachment 5.1 at 203-214.

²³⁸ Attachment 5.1 at 213.

²³⁹ Attachment 5.1 at 213.

1 In each report, PA Consulting recommended that PG&E update their bid
2 evaluation process [REDACTED].²⁴⁰ Under existing practice, any such
3 offers [REDACTED]
4 [REDACTED]
5 [REDACTED]

6 **V. RA CONTRACT AMENDMENTS IN THE RECORD PERIOD**

7 PG&E did not seek approval of any contract amendments in its RA chapter of
8 testimony. PG&E did have contract changes affecting RA during the Record Period,
9 including plants at Moss Landing. These contract changes have implications for RA, but
10 are discussed in the contract management chapter.

11 **VI. UNIT ERRORS IN PG&E’S TESTIMONY**

12 The Power Charge Indifference Adjustment (PCIA) chapter²⁴¹ makes several
13 errors in measurement units. In several places, the text says “MW-Year” or simply
14 “MW”, when the correct unit is MW-month.²⁴² Table 12-4 describes values in “Notional
15 Value (\$ millions)”, but the reported notional values are actually in thousands of
16 dollars.²⁴³

17 **VII. PCIA ISSUES**

18 **A. Change in Accounting of RA on Outage**

19 Starting in December 2025, following the approval of AL 7578-E, PG&E began
20 offering for sale some RA capacity that was expected to be on outage. Cal Advocates
21 expects these sales to draw few bidders for two reasons: 1) the unit is expected to be on

²⁴⁰ PA Consulting, *Independent Evaluator Report for the 2026 Annual Resource Adequacy and Import Energy Electronic Solicitation*, January 7, 2026, at 17. Available in the PG&E Testimony workpapers at: QCR ARB CONF Workpapers.zip/QCR ARB CONF-CPUC ONLY/Q4 2025/Confidential Attachments/07. Conf_Atch_G_IE_Reports/01_2026 Annual RA and IE E_Solicitation IE Report-CONF.pdf.

²⁴¹ PG&E Testimony at 12-1.

²⁴² PG&E Testimony at 12-4, 12-13, and 12-15.

²⁴³ PG&E Testimony at 12-14.

outage for at least part of the month, and 2) [REDACTED] ²⁴⁴

Consequently, this RA offered for sale largely serves to change the PCIA treatment of the RA, from outage to unsold. The amount of RA reported as on outage in December 2025

[REDACTED]
[REDACTED] To provide an approximate value of the size of this recategorization, at the 2025 RA market price benchmark (MPB) (\$11.21/kW-mo), [REDACTED] affected by this change lowers the value of retained RA [REDACTED]. In future ERRA Compliance Periods, when this practice applies to more months of the year, total annual effect may be several-fold larger.²⁴⁵

B. Valuing Solar in PCIA

The RA Tracker, and PCIA calculations more broadly, have not changed to reflect the Commission's shift to a slice-of-day RA framework. Many RA solar plants have 0.1 MW NQC, but can still play an important role in RA compliance by supplying charging energy for batteries. Under the current MPB framework, resources are valued based on their NQC MW, so the decision to retain or not retain an entire solar plant is valued at \$1,120/month (at the 2025 RA MPB of \$11.21/kW-month) for months where the plant is assigned an NQC of 0.1 MW. In reality, the stakes are far higher. For instance, during the Record Period, PG&E [REDACTED]
[REDACTED] Some stakeholders have predicted that energy for charging storage will become scarcer,²⁴⁷ increasing the importance of how the Commission handles these RA contracts.

²⁴⁴ [REDACTED] AL 7578-E (confidential version) at PDF page 14.

²⁴⁵ However, it would be inaccurate to simply multiply by 12, as more resources tend to be on outage in December than in peak-system-demand months.

²⁴⁶ PG&E Testimony workpapers, available at: QCR ARB CONF Workpapers.zip/QCR ARB CONF-CPUC ONLY/Q1 2025/Confidential Attachments/08. Conf_Atch_H_New_Contracts/Confid_Attachment_H_Q1_2025.xlsx.

²⁴⁷ NP Energy, *ACP-CA Energy Sufficiency-Energy Only Proposal*, February 11, 2026 (at 67). Available at: <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/resource-adequacy-compliance-materials/resource-adequacy-history/2-10-2026->

1 **VIII. CONCLUSION**

2 Cal Advocates recommends the Commission clarify that PG&E is expected to
3 make a good faith effort to sell the RA volumes it is authorized to sell under its BPP, at
4 least in peak months.

5

LIST OF ATTACHMENTS FOR CHAPTER 5

#	Attachment	Description
1	Attachment 5.1 (Confidential)	Pacific Gas and Electric Company Bundled Procurement Plan: November 19, 2025 Commission Approved Version Provided by PG&E in response to Master Data Request Question 1.4.2 (Available via e-mail)
2	Attachment 5.2 (Confidential)	Data request response to 2025 ERRR MDR "ERRR-2025-PGE-Compliance_DR_CalAdvocates_MDR001-Q063Atch01CONF.xlsx." (Available via e-mail)
3	Attachment 5.3 (Confidential)	Data request response to 2024 ERRR MDR "ERRR-2024-PGE-Compliance_DR_CalAdvocates_MDR001-Q063Atch01CONF.xlsx." (Available via e-mail)
4	Attachment 5.4 (Confidential)	Year-Over-Year RA Tracker Comparison, Work paper excerpting and taking the difference between 2024 and 2025 values. (Available via e-mail)
5	Attachment 5.5 (Confidential)	PG&E's CPUC Month-Ahead RA Compliance Supply Showings for 2025. (Available via e-mail)
6	Attachment 5.6 (Confidential)	Monthly SOD Showings and Requirements, Work paper with calculation results of monthly showings and 2025 RA Tracker. (Available via e-mail)
7	Attachment 5.7 (Confidential)	Resource Adequacy Portfolio Breakdown, Work paper digitizing and calculating differences of PG&E Quarterly Compliance Report Resource Adequacy Portfolio Breakdown 2025 (reported in PG&E Testimony at "QCR ARB CONF Workpapers.zip/QCR ARB CONF-CPUC ONLY/Q4 2025/Supplemental Confidential Attachments/Atch2-Revised_RA_Breakdown_Q4_2025-CLEAN-CONF.docx". (Available via e-mail)

APPENDIX A

QUALIFICATIONS OF WITNESSES

1 **QUALIFICATIONS AND PREPARED TESTIMONY**
2 **OF**
3 **BRIAN LUI**
4

5 **Q.1 Please state your name and business address.**

6 A.1 My name is Brian Lui. My business address is 505 Van Ness Ave, San Francisco,
7 California, 94102.
8

9 **Q.2 By whom are you employed and in what capacity?**

10 A.2 I am employed by the California Public Utilities Commission (CPUC) as a Public
11 Utilities Financial Examiner in the Public Advocates Office, Electricity Planning
12 & Policy Branch.
13

14 **Q.3 Please describe your educational and professional experience.**

15 A.3 I hold a Masters Degree in Accounting from Golden Gate University in San
16 Francisco. I also received a Bachelors of Science Degree in Biochemistry from
17 the University of California, Riverside. I joined the Commission on January 7,
18 2014 in the Public Advocates Office's Electricity Planning and Policy Branch. In
19 the Public Advocates Office, I am involved in the ERRA Forecast and ERRA
20 Compliance proceedings. Immediately prior to joining the Commission, I worked
21 for the California State Board of Equalization as a tax auditor. I have over 14
22 years of experience working as an auditor in the public sector.
23

24 **Q.4 What is the scope of your responsibility in this proceeding?**

25 A.4 I am co-sponsor of Chapter 4, Review of Balancing and Memorandum Accounts.
26

27 **Q.5 Does this complete your testimony at this time?**

28 A.5 Yes, it does.
29

1 **QUALIFICATIONS AND PREPARED TESTIMONY**
2 **OF**
3 **CRAIG JENQUIN**
4

5 **Q.1 Please state your name and business address.**

6 A.1 My name is Craig Jenquin. My business address is 320 4th St, Los Angeles,
7 California, 90013.
8

9 **Q.2 By whom are you employed and in what capacity?**

10 A.2 I am employed by the California Public Utilities Commission (CPUC) as a Public
11 Utilities Regulatory Analyst in the Public Advocates Office, Electricity Planning
12 & Policy Branch.
13

14 **Q.3 Please describe your educational and professional experience.**

15 A.3 I hold a Bachelor's of Science in Applied Mathematics and a Bachelor's of Arts in
16 Linguistics from the University of California, San Diego (UCSD). I joined the
17 Commission in August, 2022 in the Electricity Planning and Policy branch of
18 Public Advocates Office in the Procurement Cost Recovery Department. At the
19 Public Advocates Office, I have provided analysis in ERRA Forecast and
20 Compliance proceedings, focused on reviews of balancing accounts, load
21 forecasting, and least-cost dispatch.
22

23 **Q.4 What is the scope of your responsibility in this proceeding?**

24 A.4 I am responsible for:

- 25 • Chapter 2, Compliance Review of Least-Cost Dispatch And Economically-
26 Triggered Demand Response
- 27 • Chapter 4, Compliance Review of the Energy Resource Recovery Account
28 (ERRA) and Other Balancing / Memorandum Accounts

29
30 **Q.5 Does this complete your testimony at this time?**

31 A.5 Yes, it does.
32

1 **PREPARED TESTIMONY AND QUALIFICATIONS**
2 **OF**
3 **Jessica Zhang**
4

5 **Q1. Please state your name, business address, and position with the California**
6 **Public Utilities Commission (“Commission”).**

7 A1. My name is Jessica Zhang and my business address is 505 Van Ness Avenue, San
8 Francisco, California. I work in the Executive Branch of the Public Advocate
9 Office of the California Public Utilities Commission (Cal Advocates) as an
10 Analyst II.
11

12 **Q2. Please summarize your education background and professional experience.**

13 A2. I graduated from San Francisco State University with a B.A. in Accounting. I have
14 worked for Cal Advocates on the Budget and Administrative team within the
15 Executive Branch for eight years, including more than six years serving as my
16 division’s budget analyst.
17

18 **Q3. What is your responsibility in this proceeding?**

19 A3. I completed the Contract Administration chapter for this proceeding.
20

21 **Q4. Does this conclude your prepared direct testimony?**

22 A4. Yes.
23

**PREPARED TESTIMONY AND QUALIFICATIONS
OF
KARL DUNKLE WERNER**

Q1. Please state your name, business address, and position with the California Public Utilities Commission (“Commission”).

A1. My name is Karl Dunkle Werner and my business address is 505 Van Ness Avenue, San Francisco, California. I work in the Electricity Planning and Policy Branch of the Public Advocate Office of the California Public Utilities Commission (Cal Advocates) as a Regulatory Analyst.

Q2. Please summarize your education background and professional experience.

A2. I graduated from the University of Michigan with a B.S. in Economics and Interdisciplinary Physics (separate majors). I also obtained an M.S. and PhD from UC Berkeley in Agricultural and Resource Economics. I have been employed by Cal Advocates on the Resource Planning team of the Electricity Planning and Policy Branch since July 2025. Before that, I worked as an Economist at the US Treasury’s Office of Economic Policy, where worked on energy economics. Prior to the Treasury, during my PhD program, I worked on research projects related to energy economics, climate, electricity, and policy. Prior to my PhD program, I worked in the Short-Term Funding Markets team at the Federal Reserve Board. In total, I have worked on these issues of climate, energy, electricity, and financial markets for 13 years.

Q3. What is your responsibility in this proceeding?

I completed the Resource Adequacy analysis chapter for this proceeding.

Q4. Does this conclude your prepared direct testimony?

A4. Yes.

1 **PREPARED TESTIMONY AND QUALIFICATIONS**
2 **OF**
3 **SARAH CORNETT**
4

5 **Q1. Please state your name, business address, and position with the California**
6 **Public Utilities Commission (“Commission”).**

7 A1. My name is Sarah Cornett and my business address is 505 Van Ness Avenue, San
8 Francisco, California. I work in the Electricity Planning and Policy Branch of the
9 Public Advocate Office of the California Public Utilities Commission (Cal
10 Advocates) as a Regulatory Analyst.
11

12 **Q2. Please summarize your education background and professional experience.**

13 A2. I graduated from Whitman College with a B.A. in History. I also obtained a
14 Masters of Public Policy degree from UC Berkeley. I have been employed by Cal
15 Advocates on the Procurement Cost Recovery team of the Electricity Planning and
16 Policy Branch since July of 2024. Before that, I was the energy and climate
17 analyst for the California Legislative Analyst’s Office, where I advised the
18 Legislature on energy, electricity, and climate policy. I have also worked as a
19 climate policy advocate for nonprofit organizations in Seattle, Washington. In
20 total, I have worked on climate, energy, and electricity policy issues for eight
21 years.
22

23 **Q3. What is your responsibility in this proceeding?**

24 I served as Project Coordinator and completed the Executive Summary chapter for
25 this proceeding.
26

27 **Q4. Does this conclude your prepared direct testimony?**

28 A4. Yes.
29

1 **QUALIFICATIONS AND PREPARED TESTIMONY**
2 **OF**
3 **THOMAS GARIFFO**
4

5 **Q.1 Please state your name and address.**

6 A.1 My name is Thomas Gariffo. My business address is 505 Van Ness Avenue, San
7 Francisco, California.
8

9 **Q.2 By whom are you employed and in what capacity?**

10 A.2 I am employed by the Public Advocates Office of the California Public Utilities
11 Commission as a Public Utilities Regulatory Analyst in the Electric Planning and
12 Policy Branch.
13

14 **Q.3 Briefly describe your educational background and work experience.**

15 A.3 I have a Master of Public Policy degree from the Luskin School of Public Affairs
16 at the University of California, Los Angeles. I also have a Bachelor of Arts degree
17 in Political Science with a minor in Public Policy from the University of
18 California, Berkeley. I have worked as a greenhouse gas policy subject matter
19 expert in the Climate Change Initiatives section of the Public Advocates Office for
20 ten years, along with providing analysis for policies in proceedings regarding
21 transportation electrification, Low Carbon Fuel Standards (LCFS), the Electric
22 Program Investment Charge (EPIC), California's Renewable Portfolio Standards
23 (RPS), climate change adaptation and biofuels.
24

25 **Q.4 What is your area of responsibility in this proceeding?**

26 A.4 I am responsible for reviewing compliance with Cap-and-Trade regulations.
27

28 **Q.5 Does that complete your testimony?**

29 A.5 Yes, it does.

APPENDIX B

SUPPORTING ATTACHMENTS

LIST OF ATTACHMENTS FOR CHAPTER 2

#	Attachment	Description
1	Attachment 2.1 (Confidential)	A.26-02-019, Cal Advocates Workpapers – 2025_PG&E_ERRA-C_LCD-Price Forecast Analysis_CONF.xlsx (Available via e-mail)
2	Attachment 2.2 (Confidential)	A.26-02-019, Cal Advocates Workpapers – 2025_PG&E_ERRA-C_LCD-Load Forecast Analysis_CONF.xlsx (Available via e-mail)
3	Attachment 2.3 (Confidential)	A.26-02-019, Cal Advocates Workpapers – PG&E_ERRA-Comp_LCD_Total Load Analysis_2015-2025_CONF.xlsx (Available via e-mail)
4	Attachment 2.4 (Confidential)	A.26-02-019 – PG&E Opening Testimony – ERRA-2025-PGE-Compliance_Test_PGE_20260227-CONF.pdf (Available via e-mail)
5	Attachment 2.5 (Confidential)	A.26-02-019, PG&E Chapter 1 Workpapers – LCD_2025_Workpaper_6_HighestEnergyValueDays_CONF.xlsx (Available via e-mail)
6	Attachment 2.6 (Confidential)	A.25-02-013 – PG&E Chapter 1 Workpapers, LCD_2024_Workpaper_6_HighestEnergyValueDays_CONF.xlsx (Available via e-mail)
7	Attachment 2.7 (Confidential)	A.24-02-012 – PG&E response to Cal Advocates DR 08 Q02, ERRA-2023-PGE-Compliance_DR_CalAdvocates_007-Q002CONF.pdf
8	Attachment 2.8 (Confidential)	A.26-02-019 – PG&E response to Cal Advocates MDR 1.3.17, ERRA-2025-PGE-Compliance_DR_CalAdvocates_MDR001-Q062.pdf
9	Attachment 2.9 (Confidential)	A.26-02-019 – PG&E response to Cal Advocates MDR 1.3.17, ERRA-2025-PGE-Compliance_DR_CalAdvocates_MDR001-Q062.xlsx (Available via e-mail)
10	Attachment 2.10 (Confidential)	A.26-02-019 – PG&E Chapter 1 Workpapers, 2025 LCD_Workpaper_7_Load_Bid_CONF.xlsx (Available via e-mail)
11	Attachment 2.11 (Confidential)	A.25-02-013 – PG&E Chapter 1 Workpapers, 2024 LCD_Workpaper_7_Load_Bid_CONF.xlsx (Available via e-mail)
12	Attachment 2.12 (Confidential)	A.24-02-012 – PG&E Chapter 1 Workpapers, 2023 LCD_Workpaper_7_Load_Bid_CONF.xlsx (Available via e-mail)
13	Attachment 2.13 (Confidential)	A.24-02-012 – PG&E response to Cal Advocates DR 02 Q03, ERRA-2023-PGE-Compliance_DR_CalAdvocates_002-Q003CONF.pdf

#	Attachment	Description
14	Attachment 2.14 (Confidential)	A.26-02-019 – PG&E Chapter 1 Workpapers, 2025_LCD_Workpaper_2_BidCostCalculation_CONF.xlsx (Available via e-mail)
15	Attachment 2.15 (Confidential)	A.25-02-013 – PG&E Opening Testimony, PDFA_ERRA-2024-PGE-Compliance_Test_PGE_20250228-CONF.pdf (Available via e-mail)
16	Attachment 2.16 (Confidential)	A.24-02-012 – PG&E Opening Testimony, PDFA_ERRA-2023-PGE-Compliance_Test_PGE_20240228-CONF.pdf (Available via e-mail)
17	Attachment 2.17 (Confidential)	A.26-02-019 – PG&E Chapter 1 Workpapers, 2025 LCD_Workpaper_4_Hydro_Top_500_CONF.xlsx (Available via e-mail)
18	Attachment 2.18 (Confidential)	A.26-02-019 – PG&E Chapter 1 Workpapers, 2025 LCD_4_Hydro_Resources_Summary_CONF.pdf
19	Attachment 2.19 (Confidential)	A.25-02-013 – PG&E Chapter 1 Workpapers, 2024 LCD_Workpaper_4_Hydro_Top_500_CONF.xlsx (Available via e-mail)
20	Attachment 2.20 (Confidential)	A.24-02-012 – PG&E Chapter 1 Workpapers, 2023 LCD_Workpaper_4_Hydro_Top_500_CONF.xlsx (Available via e-mail)
21	Attachment 2.21 (Confidential)	A.25-02-013 – PG&E response to Cal Advocates MDR 1.3.17, ERRA-2024-PGE-Compliance_DR_CalAdvocates_MDR001-Q062.pdf
22	Attachment 2.22 (Confidential)	A.25-02-013 – PG&E response to Cal Advocates MDR 1.3.17, ERRA-2024-PGE-Compliance_DR_CalAdvocates_MDR001-Q062.xlsx (Available via e-mail)
23	Attachment 2.23 (Confidential)	A.24-02-012 – PG&E response to Cal Advocates MDR 1.3.15, ERRA-2024-PGE-Compliance_DR_CalAdvocates_MDR001-Q062.pdf
24	Attachment 2.24 (Confidential)	A.24-02-012 – PG&E response to Cal Advocates MDR 1.3.15, ERRA-2024-PGE-Compliance_DR_CalAdvocates_MDR001-Q062.xlsx (Available via e-mail)

ATTACHMENT 2.1

**A.26-02-019, Cal Advocates Workpapers –
2025_PG&E_ERRR-C_LCD-Price Forecast
Analysis_CONF.xlsx**

(Available via e-mail)

(CONFIDENTIAL)

ATTACHMENT 2.2

**A.26-02-019, Cal Advocates Workpapers –
2025_PG&E_ERRR-C_LCD-Load Forecast
Analysis_CONF.xlsx**

(Available via e-mail)

(CONFIDENTIAL)

ATTACHMENT 2.3

**A.26-02-019, Cal Advocates Workpapers –
PG&E_ERRA-Comp_LCD_Total Load
Analysis_2015-2025_CONF.xlsx**

(Available via e-mail)

(CONFIDENTIAL)

ATTACHMENT 2.4

**A.26-02-019 – PG&E Opening Testimony – ERRRA-
2025-PGE-Compliance_Test_PGE_20260227-
CONF.pdf**

(Available via e-mail)

(CONFIDENTIAL)

ATTACHMENT 2.5

**A.26-02-019, PG&E Chapter 1 Workpapers –
LCD_2025_Workpaper_6_HighestEnergyValueDays_
CONF.xlsx**

(Available via e-mail)

(CONFIDENTIAL)

ATTACHMENT 2.6

**A.25-02-013 – PG&E Chapter 1 Workpapers,
LCD_2024_Workpaper_6_HighestEnergyValueDays_
CONF.xlsx**

(Available via e-mail)

(CONFIDENTIAL)

ATTACHMENT 2.7

**A.24-02-012 – PG&E response to Cal Advocates
DR 08 Q02, ERRRA-2023-PGE-
Compliance_DR_CalAdvocates_007-Q002CONF.pdf**

(CONFIDENTIAL)

ATTACHMENT 2.8

**A.26-02-019 – PG&E response to Cal Advocates
MDR 1.3.17, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_MDR001-Q062.pdf**

(CONFIDENTIAL)

ATTACHMENT 2.9

**A.26-02-019 – PG&E response to Cal Advocates
MDR 1.3.17, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_MDR001-Q062.xlsx**

(Available via Email)

(CONFIDENTIAL)

ATTACHMENT 2.10

**A.26-02-019 – PG&E Chapter 1 Workpapers,
2025 LCD_Workpaper_7_Load_Bid_CONF.xlsx**

(Available via Email)

(CONFIDENTIAL)

ATTACHMENT 2.11

**A.25-02-013 – PG&E Chapter 1 Workpapers,
2024 LCD_Workpaper_7_Load_Bid_CONF.xlsx**

(Available via Email)

(CONFIDENTIAL)

ATTACHMENT 2.12

**A.24-02-012 – PG&E Chapter 1 Workpapers,
2023 LCD_Workpaper_7_Load_Bid_CONF.xlsx**

(Available via Email)

(CONFIDENTIAL)

ATTACHMENT 2.13

**A.24-02-012 – PG&E response to Cal Advocates
DR 02 Q03, ERRRA-2023-PGE-
Compliance_DR_CalAdvocates_002-Q003CONF.pdf**

(CONFIDENTIAL)

ATTACHMENT 2.14

**A.26-02-019 – PG&E Chapter 1 Workpapers,
2025_LCD_Workpaper_2_BidCostCalculation_CONF
.xlsx**

(Available via Email)

(CONFIDENTIAL)

ATTACHMENT 2.15

**A.25-02-013 – PG&E Opening Testimony,
PDF_A_ERRR-2024-PGE-
Compliance_Test_PGE_20250228-CONF.pdf**

(Available via Email)

(CONFIDENTIAL)

ATTACHMENT 2.16

**A.24-02-012 – PG&E Opening Testimony,
PDF_A_ERRA-2023-PGE-
Compliance_Test_PGE_20240228-CONF.pdf**

(Available via Email)

(CONFIDENTIAL)

ATTACHMENT 2.17

**A.26-02-019 – PG&E Chapter 1 Workpapers,
2025 LCD_Workpaper_4_Hydro_Top_500_CONF.xlsx**

(Available via Email)

(CONFIDENTIAL)

ATTACHMENT 2.18

**A.26-02-019 – PG&E Chapter 1 Workpapers,
2025 LCD_4_Hydro_Resources_Summary_CONF.pdf**

(CONFIDENTIAL)

ATTACHMENT 2.19

**A.25-02-013 – PG&E Chapter 1 Workpapers,
2024 LCD_Workpaper_4_Hydro_Top_500_CONF.xlsx**

(Available via Email)

(CONFIDENTIAL)

ATTACHMENT 2.20

**A.24-02-012 – PG&E Chapter 1 Workpapers,
2023 LCD_Workpaper_4_Hydro_Top_500_CONF.xlsx**

(Available via Email)

(CONFIDENTIAL)

ATTACHMENT 2.21

**A.25-02-013 – PG&E response to Cal Advocates
MDR 1.3.17, ERRRA-2024-PGE-
Compliance_DR_CalAdvocates_MDR001-Q062.pdf**

(CONFIDENTIAL)

ATTACHMENT 2.22

**A.25-02-013 – PG&E response to Cal Advocates
MDR 1.3.17, ERRRA-2024-PGE-
Compliance_DR_CalAdvocates_MDR001-Q062.xlsx**

(Available via e-mail)

(CONFIDENTIAL)

ATTACHMENT 2.23

**A.24-02-012 – PG&E response to Cal Advocates
MDR 1.3.15, ERRRA-2024-PGE-
Compliance_DR_CalAdvocates_MDR001-Q062.pd**

(CONFIDENTIAL)

ATTACHMENT 2.24

**A.24-02-012 – PG&E response to Cal Advocates
MDR 1.3.15, ERRRA-2024-PGE-
Compliance_DR_CalAdvocates_MDR001-Q062.xlsx**

(Available via e-mail)

(CONFIDENTIAL)

LIST OF ATTACHMENTS FOR CHAPTER 3

#	Attachment	Description
1	Attachment 3.1	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q001
2	Attachment 3.2 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002CONF
3	Attachment 3.3 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch01CONF
4	Attachment 3.4 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch02CONF
5	Attachment 3.5 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch03CONF
6	Attachment 3.6 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch04CONF
7	Attachment 3.7 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch05CONF
8	Attachment 3.8 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch06CONF
9	Attachment 3.9 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch07CONF
10	Attachment 3.10 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch08CONF
11	Attachment 3.11 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch09CONF
12	Attachment 3.12 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch10CONF
13	Attachment 3.13 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch11CONF
14	Attachment 3.14 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch12CONF
15	Attachment 3.15 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch13CONF

#	Attachment	Description
16	Attachment 3.16 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch14CONF
17	Attachment 3.17 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch15CONF
18	Attachment 3.18 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch16CONF
19	Attachment 3.19 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch17CONF
20	Attachment 3.20 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_DR_CalAdvocates_007-Q002Atch18CONF
21	Attachment 3.21 (Confidential)	PG&E Response, ERRRA-2025-PGE-Compliance_MDR_PGE_EveridgeKA_NonProcurement CONF

ATTACHMENT 3.1

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-Q001**

(CONFIDENTIAL)

ATTACHMENT 3.2

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-Q002CONF**

(CONFIDENTIAL)

ATTACHMENT 3.3

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-
Q002Atch01CONF**

(CONFIDENTIAL)

ATTACHMENT 3.4

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-
Q002Atch02CONF**

(CONFIDENTIAL)

ATTACHMENT 3.5

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-
Q002Atch03CONF**

(CONFIDENTIAL)

ATTACHMENT 3.6

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-
Q002Atch04CONF**

(CONFIDENTIAL)

ATTACHMENT 3.7

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-
Q002Atch05CONF**

(CONFIDENTIAL)

ATTACHMENT 3.8

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-
Q002Atch06CONF**

(CONFIDENTIAL)

ATTACHMENT 3.9

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-Q002Atch07CON**

(CONFIDENTIAL)

ATTACHMENT 3.10

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-
Q002Atch08CONF**

(CONFIDENTIAL)

ATTACHMENT 3.11

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-
Q002Atch09CONF**

(CONFIDENTIAL)

ATTACHMENT 3.12

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-
Q002Atch10CONF**

(CONFIDENTIAL)

ATTACHMENT 3.13

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-
Q002Atch11CONF**

(CONFIDENTIAL)

ATTACHMENT 3.14

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-
Q002Atch12CONF**

(CONFIDENTIAL)

ATTACHMENT 3.15

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-
Q002Atch13CONF**

(CONFIDENTIAL)

ATTACHMENT 3.16

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-
Q002Atch14CONF**

(CONFIDENTIAL)

ATTACHMENT 3.17

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-
Q002Atch15CONF**

(CONFIDENTIAL)

ATTACHMENT 3.18

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-
Q002Atch16CONF**

(CONFIDENTIAL)

ATTACHMENT 3.19

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-
Q002Atch17CONF**

(CONFIDENTIAL)

ATTACHMENT 3.20

**PG&E Response, ERRRA-2025-PGE-
Compliance_DR_CalAdvocates_007-
Q002Atch18CONF**

(CONFIDENTIAL)

ATTACHMENT 3.21

**PG&E Response, ERRA-2025-PGE-
Compliance_MDR_PGE_EveridgeKA_NonProcurement
CONF**

(CONFIDENTIAL)

LIST OF ATTACHMENTS FOR CHAPTER 5

#	Attachment	Description
1	Attachment 5.1 (Confidential)	Pacific Gas and Electric Company Bundled Procurement Plan: November 19, 2025 Commission Approved Version Provided by PG&E in response to Master Data Request Question 1.4.2 (Available via Email)
2	Attachment 5.2 (Confidential)	Data request response to 2025 ERRR MDR “ERRR-2025-PGE-Compliance_DR_CalAdvocates_MDR001-Q063Atch01CONF.xlsx.” (Available via e-mail)
3	Attachment 5.3 (Confidential)	Data request response to 2024 ERRR MDR “ERRR-2024-PGE-Compliance_DR_CalAdvocates_MDR001-Q063Atch01CONF.xlsx.” (Available via e-mail)
4	Attachment 5.4 (Confidential)	Year-Over-Year RA Tracker Comparison, Work paper excerpting and taking the difference between 2024 and 2025 values. (Available via e-mail)
5	Attachment 5.5 (Confidential)	PG&E’s CPUC Month-Ahead RA Compliance Supply Showings for 2025. (Available via e-mail)
6	Attachment 5.6 (Confidential)	Monthly SOD Showings and Requirements, Work paper with calculation results of monthly showings and 2025 RA Tracker. (Available via e-mail)
7	Attachment 5.7 (Confidential)	Resource Adequacy Portfolio Breakdown, Work paper digitizing and calculating differences of PG&E Quarterly Compliance Report Resource Adequacy Portfolio Breakdown 2025 (reported in PG&E Testimony at “QCR ARB CONF Workpapers.zip/QCR ARB CONF-CPUC ONLY/Q4 2025/Supplemental Confidential Attachments/Atch2-Revised_RA_Breakdown_Q4_2025-CLEAN-CONF.docx”. (Available via e-mail)

ATTACHMENT 5.1

**Pacific Gas and Electric Company Bundled
Procurement Plan: November 19, 2025 Commission
Approved Version Provided by PG&E in response to
Master Data Request Question 1.4.2**

(CONFIDENTIAL)

ATTACHMENT 5.2

**Data request response to 2025 ERRR MDR “ERRR-
2025-PGE-Compliance_DR_CalAdvocates_MDR001-
Q063Atch01CONF.xlsx”**

(Available via e-mail)

(CONFIDENTIAL)

ATTACHMENT 5.3

**Data request response to 2024 ERRR MDR “ERRR-
2024-PGE-Compliance_DR_CalAdvocates_MDR001-
Q063Atch01CONF.xlsx”**

(Available via e-mail)

(CONFIDENTIAL)

ATTACHMENT 5.4

**Year-Over-Year RA Tracker Comparison,
Work paper excerpting and taking the difference
between 2024 and 2025 values**

(Available via e-mail)

(CONFIDENTIAL)

ATTACHMENT 5.5

PG&E's CPUC Month-Ahead RA Compliance Supply Showings for 2025

(Available via e-mail)

(CONFIDENTIAL)

ATTACHMENT 5.6

**Monthly SOD Showings and Requirements,
Work paper with calculation results of monthly
showings and 2025 RA Tracker**

(Available via e-mail)

(CONFIDENTIAL)

ATTACHMENT 5.7

**Resource Adequacy Portfolio Breakdown, Work paper
digitizing and calculating differences of PG&E Quarterly
Compliance Report Resource Adequacy Portfolio
Breakdown 2025 (reported in PG&E Testimony at “QCR
ARB CONF Workpapers.zip/QCR ARB CONF-CPUC
ONLY/Q4 2025/Supplemental Confidential
Attachments/Atch2-Revised_ RA_Breakdown_Q4_2025-
CLEAN-CONF.docx”**

(Available via e-mail)

(CONFIDENTIAL)