

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



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Application of Pacific Gas and Electric Company (U39M) to Submit Its 2020 Risk Assessment and Mitigation Phase Report.

Application 20-06-012

NOT CONSOLIDATED

Application of Pacific Gas and Electric Company (U 39 M) for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2023.

Application 21-06-021

NOT CONSOLIDATED

Application of Pacific Gas and Electric Company (U 39 M) to Submit Its 2024 Risk Assessment and Mitigation Phase Report.

Application 24-05-008

**COMMENTS OF THE PUBLIC ADVOCATES OFFICE ON  
PACIFIC GAS AND ELECTRIC COMPANY'S  
2023 RISK SPENDING ACCOUNTABILITY REPORT**

**MILES GORDON**  
Regulatory Analyst

Public Advocates Office  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [miles.gordon@cpuc.ca.gov](mailto:miles.gordon@cpuc.ca.gov)

**ANGELA WUERTH**  
Attorney

Public Advocates Office  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
Telephone: (415) 703-1083  
Email: [angela.wuerth@cpuc.ca.gov](mailto:angela.wuerth@cpuc.ca.gov)

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## I. INTRODUCTION

Pursuant to Decision (D.) 22-10-002,<sup>1</sup> the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits these comments on the Risk Spending Accountability Report (2023 RSAR) submitted by Pacific Gas and Electric Company (PG&E) on June 17, 2024 (PG&E's 2023 RSAR).<sup>2</sup>

PG&E's 2023 RSAR reports on PG&E's authorized and actual spending and work completed within the first year of PG&E's 2023-26 General Rate Case (GRC) period, for activities that address safety, reliability, and/or maintenance, in accordance with Public Utilities Code Section 591, Decision (D.) 19-04-020,<sup>3</sup> and D.22-10-002.<sup>4</sup> <sup>5</sup> These reports provide necessary data for the Commission to ensure the safety of the public. A utility's failure to complete necessary safety and reliability work can cause catastrophic events such as wildfires, pipeline explosions, and prolonged power outages.<sup>6</sup> PG&E's

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<sup>1</sup> Decision 22-10-002, *Decision Addressing Phase 1 Track 3 and 4 issues*, October 6, 2022. Appendix A, at A-1 sets April 30 as the annual deadline for RSAR filings and July 21 as the annual deadline for intervenor comments. However, on January 30, 2024, PG&E requested an extension of time to file its 2023 RSAR. On February 20, 2024, the Commission's Energy Division granted PG&E's request, shifting the deadlines for PG&E's RSAR filing to May 31, 2024, and the deadline for intervenor comments to August 21, 2024. PG&E filed its 2023 RSAR on May 31, 2024, and then filed an amendment to its 2023 RSAR on June 17, 2024.

<sup>2</sup> *Pacific Gas and Electric Company's (U 39 M) Amendment to the 2023 Risk Spending Accountability Report*, June 17, 2024 (2023 RSAR); in A.20-06-012, A.21-06-021, A.24-05-008.

<sup>3</sup> D.19-04-020 Ordering Paragraphs 8-14.

<sup>4</sup> D.22-10-002 Ordering Paragraphs 1-5.

<sup>5</sup> While PG&E's General Rate Case Decision (D.23-11-069) was not adopted until the end of 2023, PG&E's 2023 RSAR reports on their spending and work completion versus the imputed 2023 figures derived from D.23-11-069.

<sup>6</sup> See Senate Bill 549 (2017) (adding Section 591 to the Public Utilities Code), Bill Analysis by Senate Committee on Energy, Utilities, and Communications, March 20, 2017 at 2:

“Recent events have revealed that at varying times, utilities have not been expending funds authorized by the CPUC in the general rate case (GRC) for safety-related purposes or diverting funds to non-safety-related purposes or not expended. The author has noted instances where utilities had not expended funds that had been authorized which may have contributed to instances of damage, injury or fatality, including extended power outages in Southern California Edison (SCE) territory during a windstorm and, most notably, the fatal San Bruno Pacific Gas & Electric (PG&E) natural gas pipeline explosion in 2010.”

equipment was responsible for incidents such as the San Bruno Pipeline explosion that killed eight people, hospitalized 51 more, and destroyed 38 homes<sup>7</sup> as well as the 2018 Camp Fire that killed 85 people and destroyed nearly 19,000 buildings.<sup>8</sup> As this history shows, it is imperative that the Commission scrutinize PG&E's safety, reliability, and maintenance performance.

PG&E continues to fall behind in completing critical safety and reliability work. Specifically, Cal Advocates has identified the following areas of concern in PG&E's 2023 RSAR:

- PG&E has failed to complete work in key safety and reliability programs in 2023 that PG&E also failed to complete in the 2020-2022 GRC period. One such program is Overhead Conductor Replacement, a key mitigation for wires down events.<sup>9</sup>
- PG&E has not finished work in 16 different electric distribution capital programs funded in its 2023 GRC. Instead, PG&E is diverting resources to other programs, and PG&E reports that this problem will continue throughout the 2023 GRC cycle.<sup>10</sup>
- PG&E's Vintage Pipe Replacement Program has been halted. This exposes customers to possible risk of gas pipeline rupture and resultant property damage, injury and death.<sup>11</sup>

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<sup>7</sup> U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration, Pacific Gas & Electric Pipeline Rupture in San Bruno, CA, <https://www.phmsa.dot.gov/safety-awareness/pipeline/pacific-gas-electric-pipeline-rupture-san-bruno-ca>.

<sup>8</sup> National Public Radio, PG&E Pleads Guilty On 2018 California Camp Fire: "Our Equipment Started That Fire," June 16, 2020, <https://www.npr.org/2020/06/16/879008760/pg-e-pleads-guilty-on-2018-california-camp-fire-our-equipment-started-that-fire>.

<sup>9</sup> See Figure 1 below.

<sup>10</sup> PG&E Response to Cal Advocates Data request 1, Q1, regarding these programmatic changes: "At this time PG&E anticipates these changes will continue to impact PG&E's priorities for the 2023 GRC cycle."

<sup>11</sup> MAT Code 75E (Vintage Pipe Program) as reported in <sup>11</sup> PG&E's 2023 RSAR, Table 2-10, line 46. at 2-69. See Figure 3 below for PG&E's reported progress on its Vintage Pipe Replacement Program.

Considering PG&E’s shortcomings, Cal Advocates urges the Commission to:

- Require PG&E to file a corrective action plan that sets forth how it will complete the safety work that it has neglected since the 2020-2022 GRC cycle;
- Require PG&E to file a corrective action plan that sets forth how it will complete work in the 16 identified electric distribution capital programs during the 2023-2026 GRC period;
- Require PG&E to file a corrective action plan that sets forth how it will complete work in its Vintage Pipe program and expedite its now halted Vintage Pipe Replacement Program;
- Further investigate the programs with the highest redirection of funds, unit backlogs, and work overcompletions; and
- Institute an oversight process to ensure that PG&E and other utilities catch up on incomplete safety and reliability work or justify why such work is no longer needed.

## II. DISCUSSION

### A. PG&E continues to fall behind in completing critical safety and reliability work.

PG&E continues to fall behind in completing critical safety and reliability work.

Such work is needed, for example, to:

- Reduce the number of wires down that PG&E experiences each year.<sup>12</sup>
- Prevent ignitions and wildfires caused by pole failures.<sup>13</sup>
- Prevent manhole explosions.<sup>14</sup>
- Prevent gas pipeline failures and explosions.<sup>15</sup>

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<sup>12</sup> PG&E 2023 Safety Performance Metrics report at 5-1: Risks from Wires Down events include: “Wildfire, Failure of Electric Transmission Overhead Assets, and Failure of Electric Distribution Overhead Assets.”

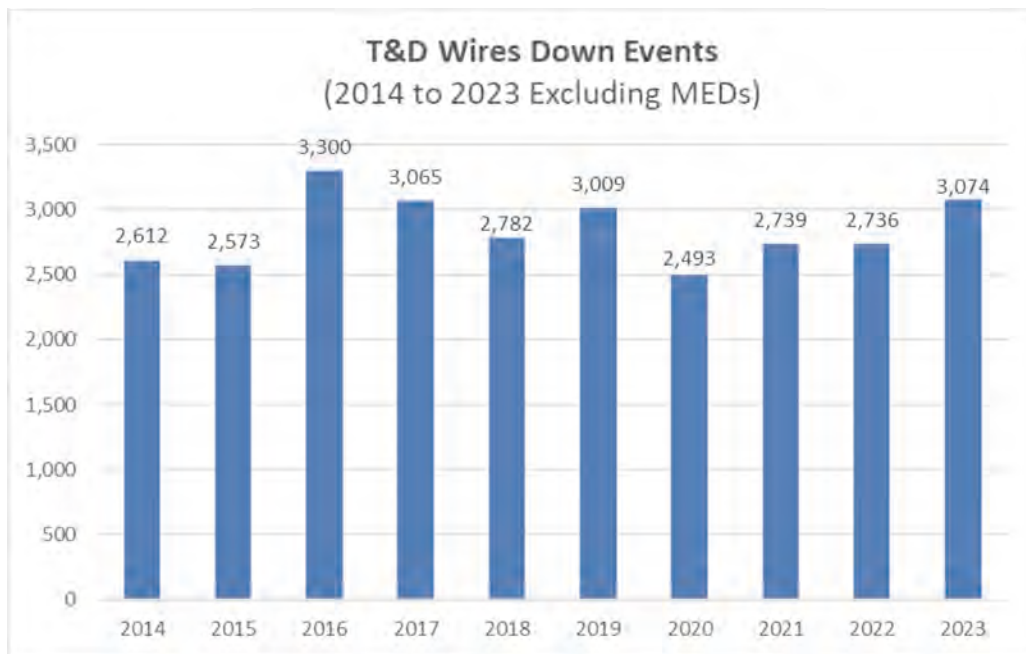
<sup>13</sup> PG&E’s 2023 RSAR at 3-7.

<sup>14</sup> San Francisco Chronicle, “Explosion spews from PG&E manhole, rocks S.F.’s Pacific Heights neighborhood”. Available at: <https://www.sfchronicle.com/bayarea/article/pg-e-manhole-explosion-in-san-francisco-18191775.php>.

<sup>15</sup> A.21-06-021, Exh. PG&E-03 at 5-76.

As one example, PG&E reports<sup>16</sup> that it experiences roughly 3,000 wires down annually (please see Figure 1). Wires down are an electrical hazard and potential wildfire ignition source.<sup>17</sup>

**Figure 1: PG&E's Wires Down Events 2014 through 2023<sup>18</sup>**



This year’s RSAR again finds that PG&E continues to fall behind in completion of necessary safety and reliability work, including electrical distribution maintenance work. Investigations of utility infrastructure events have identified incomplete safety and

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<sup>16</sup> PG&E 2023 Safety Performance Metrics Report at 5-2.

<sup>17</sup> PG&E 2023 Safety Performance Metrics report at 5-1: Risks from Wires Down events include: “Wildfire, Failure of Electric Transmission Overhead Assets, and Failure of Electric Distribution Overhead Assets.”

<sup>18</sup> PG&E 2023 Safety Performance Metrics Report at 5-2.

reliability work as a root cause of costly catastrophic events.<sup>19 20. 21. 22. 23 24</sup> To stem the impacts and costs of such events on ratepayers, the Commission should require PG&E to submit corrective action plans, as described in Sections II.B, II.C, and II.D below, to catch-up on necessary work that remains incomplete.

Also, as described in Section II.E, the Commission should further investigate the programs with the highest redirection of funds, unit backlogs, and work overcompletions<sup>25. 26</sup> The Commission should investigate each of these programs to ensure that PG&E prudently spent ratepayer funds and completed work that is necessary to ensure the safety and reliability of PG&E's electric and gas systems.

Finally, as discussed in Section II.F, the Commission should institute an oversight process to ensure that PG&E and other utilities catch up on incomplete safety and reliability work or justify why such work is no longer needed. There is no oversight process in place for PG&E and the other utilities' RSAR filings, which prevents the Commission from being able to adequately scrutinize PG&E's safety and reliability

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<sup>19</sup> Comments of the Public Advocates Office on Pacific Gas & Electric Company's 2022 Risk Spend Accountability Report (Cal Advocates' PG&E 2022 RSAR Comments), July 21, 2023, at 15.

<sup>20</sup> CAL FIRE, *CAL FIRE Investigators Determine Cause of the Zogg Fire* (March 22, 2021), <https://yubanet.com/california/cal-fire-investigators-determine-cause-of-the-zogg-fire/>

<sup>21</sup> Morris, JD. *Camp Fire failure part of PG&E's 'pattern' of poor maintenance, regulators say* (December 3, 2019), San Francisco Chronicle. <https://www.sfchronicle.com/californiawildfires/article/Regulators-PG-E-could-have-prevented-Camp-Fire-14877131.php>.

<sup>22</sup> *Motion of the Safety and Enforcement Division to Expand the Proceeding Scope to Include the 2018 Camp Fire, Appendix A, SED Incident Investigation Report for 2018 Camp Fire with Attachments*, November 26, 2019, at 16; in I.19-06-015.

<sup>23</sup> Van Derbeken, Jaxon. *PG&E Admits it Broke 2020 Promise to Fully Inspect 50K Poles in High Fire Risk Zones* (May 14, 2021). NBC Bay Area. <https://www.nbcbayarea.com/investigations/pge-admits-itbroke-2020-promise-to-fully-inspect-58000-poles-in-high-fire-risk-zones/2545708/>.

<sup>24</sup> Order Instituting Investigation, Order to Show Cause, and Notice of Hearing, July 18, 2016, Attachment 3, Safety and Enforcement Division, Investigation Report of Outages During July and August of 2015 in Southern California Edison Company's Long Beach District, at 28, in I.16-07-007.

<sup>25</sup> Overcompletions refers to programs and projects in which the utility has completed more work units than the number of imputed authorized work units.

<sup>26</sup> See Appendix A.

performance. It is critical for the Commission to implement an oversight process to protect the public from catastrophic events.<sup>27</sup>

**B. The Commission should require PG&E to file a corrective action plan that sets forth how it will complete the safety work that it has neglected since the 2020-2022 GRC cycle.**

PG&E reports in its 2023 RSAR that it has not finished work in several programs for which it failed to complete work during the 2020-2022 GRC period. These programs include the following.

- Overhead Conductor Replacement:<sup>28</sup> PG&E did not complete 64% of its authorized work in 2023<sup>29</sup> and 68% of its authorized work in the 2020-22 GRC cycle.<sup>30</sup>
- Intrusive Pole Inspections:<sup>31</sup> PG&E did not complete 55% of its authorized work in 2023<sup>32</sup> and 15% of authorized work in the 2020-22 GRC cycle.<sup>33</sup>
- Underground Manhole Inspections:<sup>34</sup> PG&E did not complete any authorized work in 2023,<sup>35</sup> and PG&E did not complete 51% of authorized work in the 2020-22 GRC cycle.<sup>36</sup>

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<sup>27</sup> See Senate Bill 549 (2017) (adding Section 591 to the Public Utilities Code), Bill Analysis by Senate Committee on Energy, Utilities, and Communications, March 20, 2017 at 2.

<sup>28</sup> MAT Code 08J.

<sup>29</sup> PG&E's 2023 RSAR, Table 3-4, Line 27 at 3-12.

<sup>30</sup> Pacific Gas and Electric Company's (U39M) 2022 Risk Spending Accountability Report, May 1, 2023 (PG&E's 2022 RSAR), Table 3-4, Line 27; in A.18-12-009, A.20-06-012, A.21-06-021 (PG&E's 2022 RSAR).

<sup>31</sup> MAT Code GAA.

<sup>32</sup> PG&E's 2022 RSAR, Table 3-3, Line 76.

<sup>33</sup> PG&E's 2023 RSAR, Table 3-3, Line 89 at 3-6.

<sup>34</sup> MAT Code BFF.

<sup>35</sup> PG&E's 2023 RSAR, Table 3-3, line 58 at 3-5.

<sup>36</sup> PG&E's 2022 RSAR, Table 3-3, line 42.



- Underground General Corrective Maintenance:<sup>37</sup> PG&E did not complete 20% of its authorized work in 2023<sup>38</sup> and 20% of its authorized work in the 2020 GRC cycle).<sup>39</sup>
- Underground Critical Operating Equipment Corrective Maintenance:<sup>40</sup> PG&E did not complete 41% of its authorized work in 2023<sup>41</sup> and 40% of its authorized work in the 2020-22 GRC cycle.<sup>42</sup>

The percentages of work not completed in these programs are displayed in Figures 2 and 3 below, and the program spending is depicted in Figures 4 through 7.

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<sup>37</sup> MAT Code KBA.

<sup>38</sup> PG&E's 2023 RSAR, Table 3-3, line 202 at 3-10.

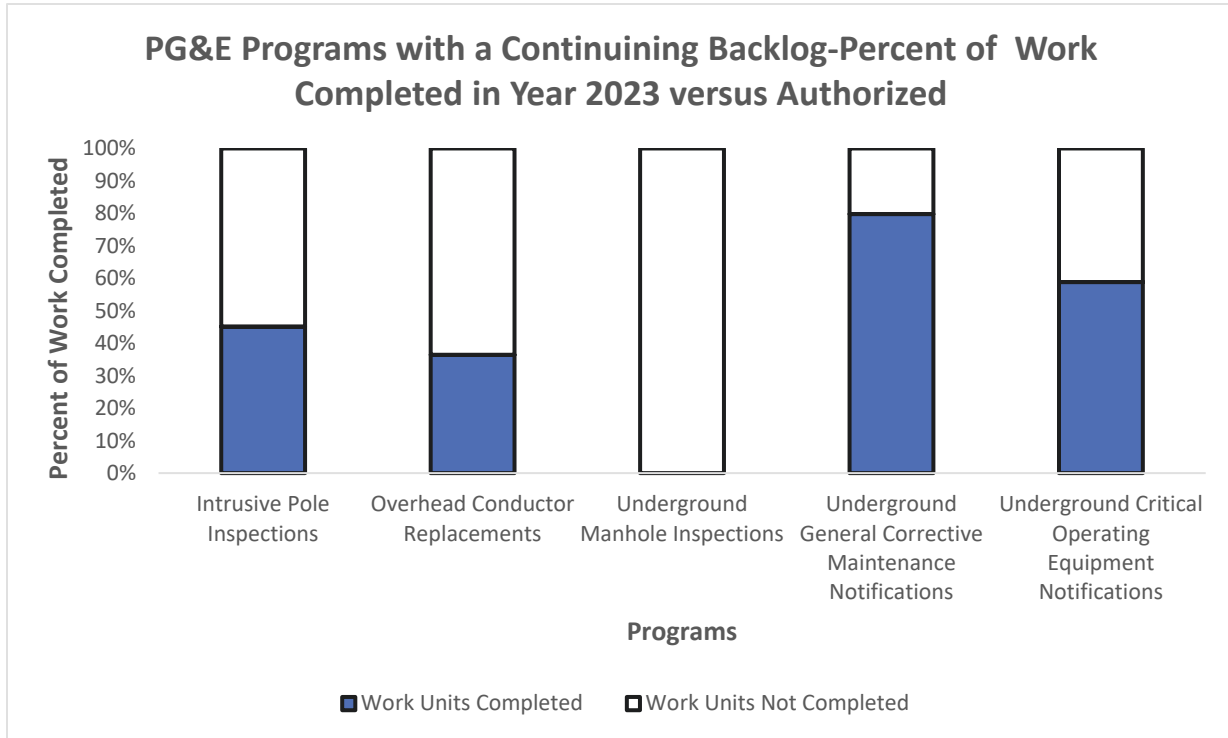
<sup>39</sup> PG&E's 2022 RSAR, Table 3-3, line 168.

<sup>40</sup> MAT Code KBC.

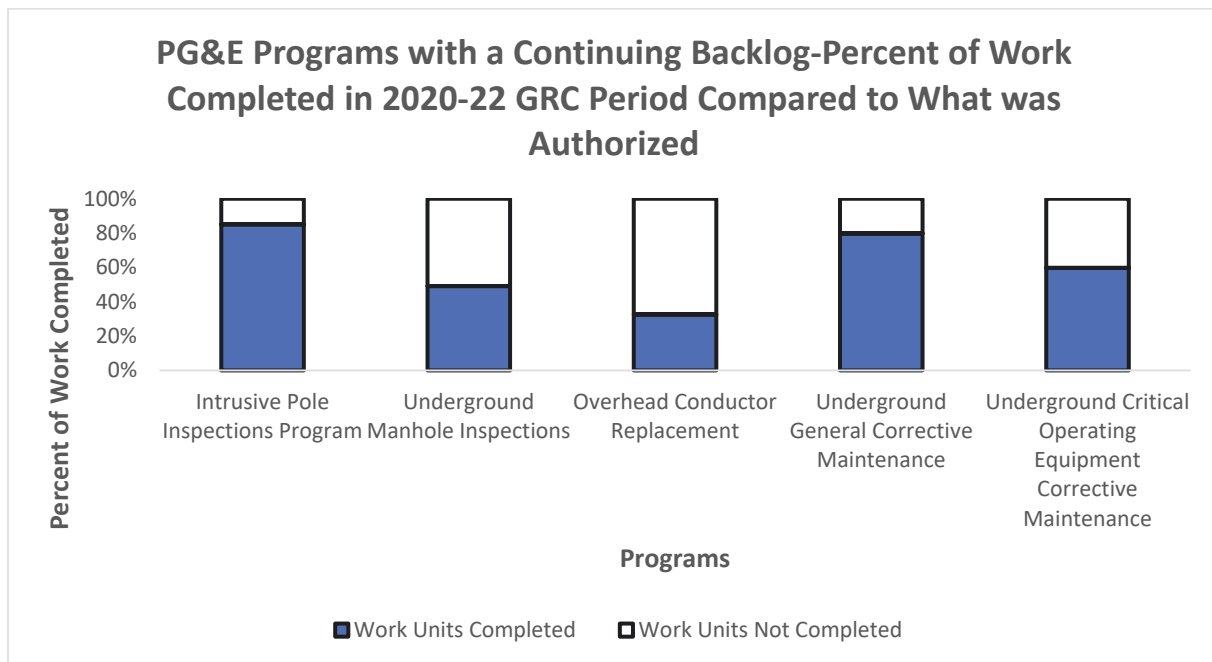
<sup>41</sup> PG&E's 2023 RSAR, Table 3-3, line 204 at 3-10.

<sup>42</sup> PG&E's 2022 RSAR, Table 3-3, line 169.

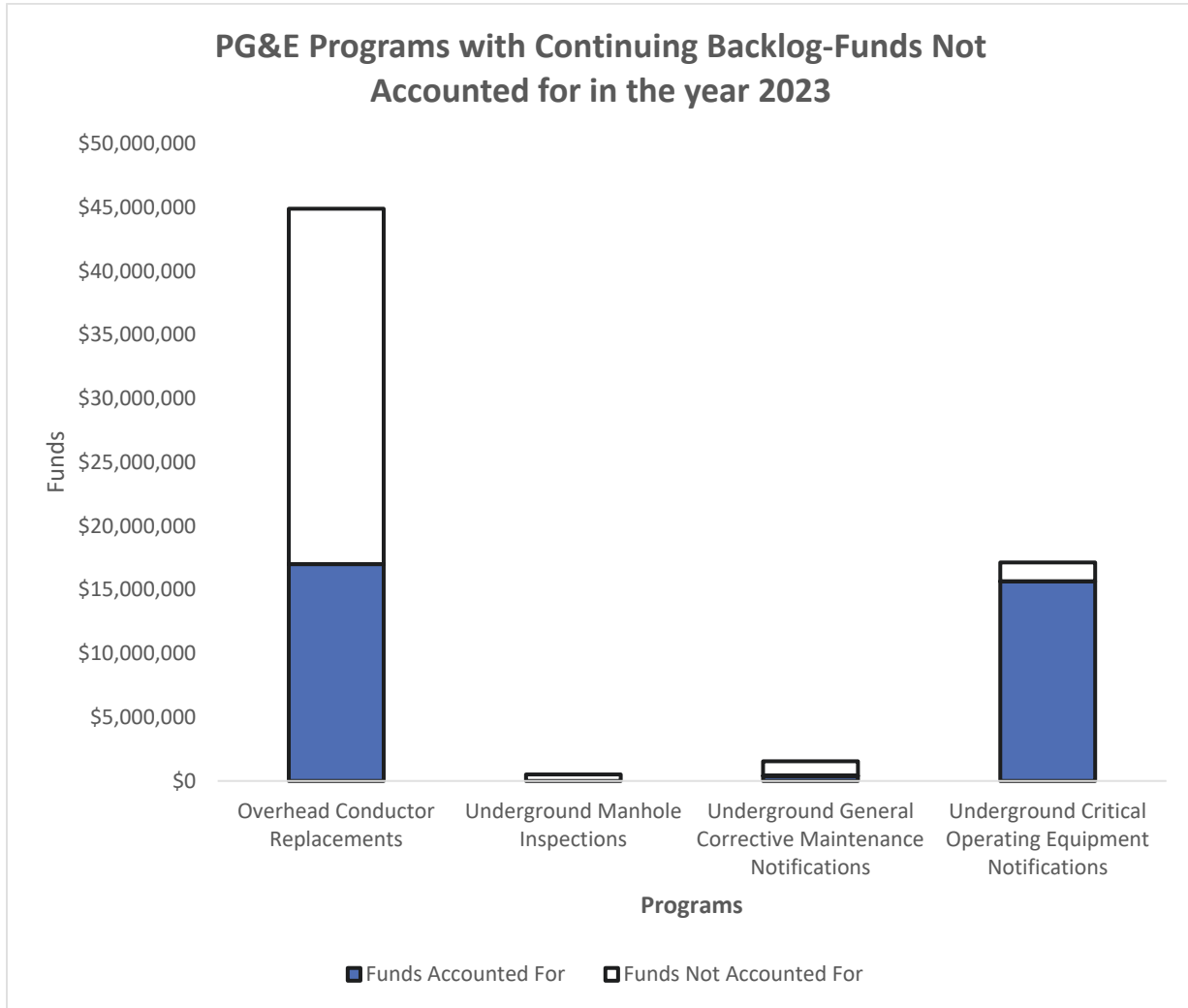
**Figure 2: PG&E's Work Completion in Programs with a Continuing Backlog in 2023<sup>43</sup>**



**Figure 3: PG&E's Work Completion in Programs with a Continuing Backlog in the 2020-22 GRC Period<sup>44</sup>**



**Figure 4: Funds Not Accounted for in 2023 for PG&E programs with a Continuing Backlog<sup>45</sup>**

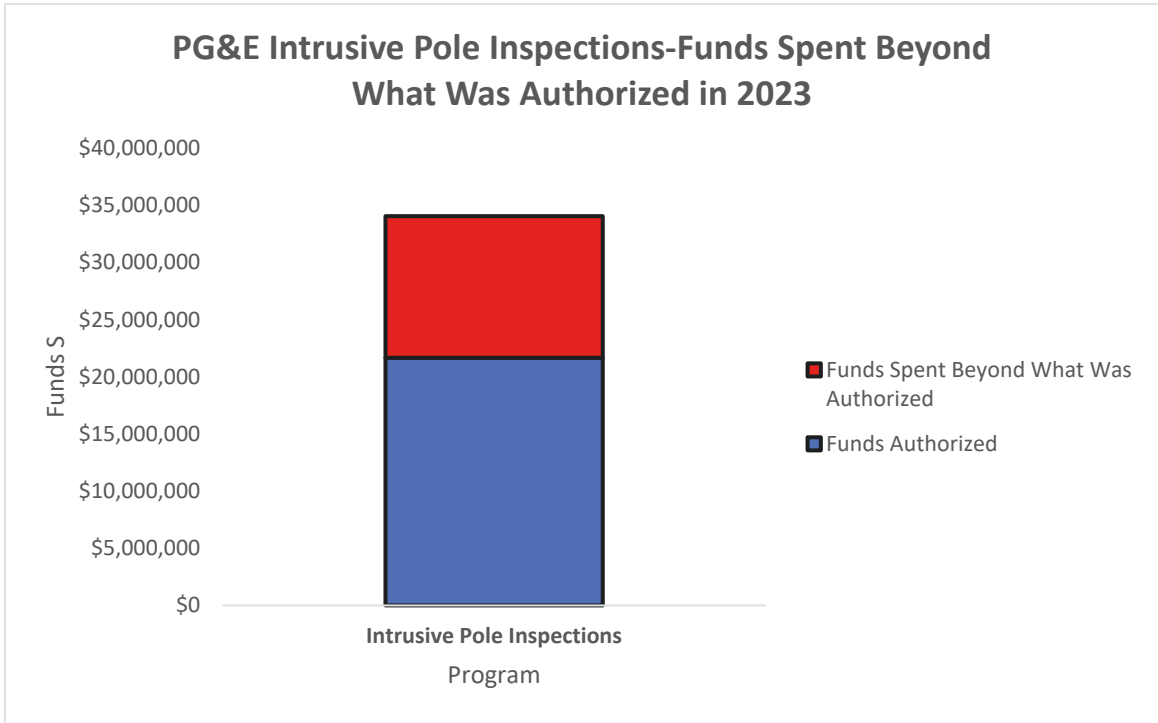


<sup>43</sup> PG&E’s 2023 RSAR, Table 3-3 line 58 at 3-5, line 89 at 3-6, lines 202, and 204 at 3-10, and Table 3-4 line 27 at 3-12.

<sup>44</sup> PG&E’s 2022 RSAR, Table 3-3 lines 42, 76, 168, and 169, and Table 3-4 line 27.

<sup>45</sup> PG&E’s 2023 RSAR, Table 3-3, line 58 at 3-5, lines 202 and 204 at 3-10, and Table 3-4 line 27 at 3-12.

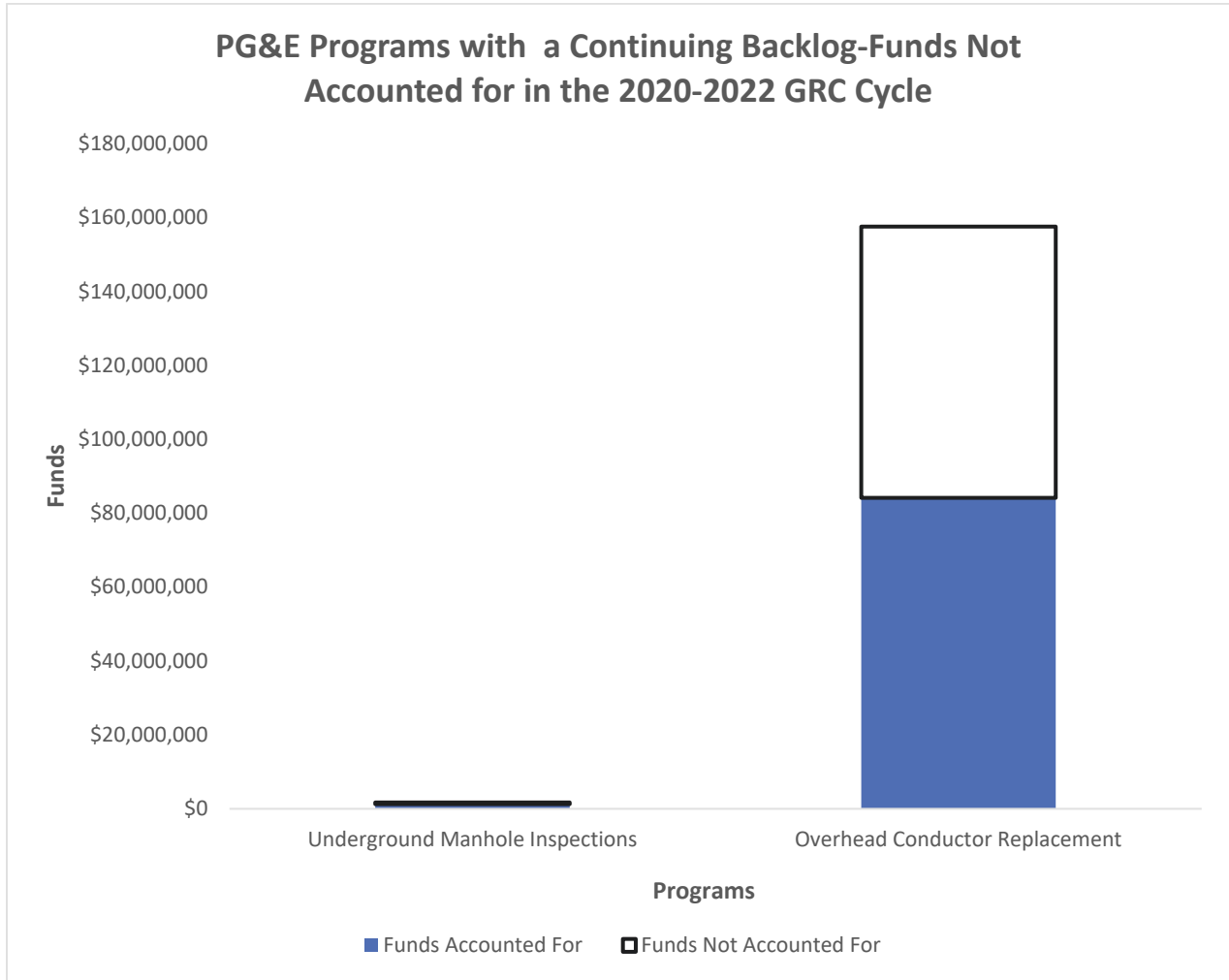
**Figure 5: Funds Spent Beyond What Was Authorized for PG&E's Intrusive Pole Inspections Program<sup>46</sup>**



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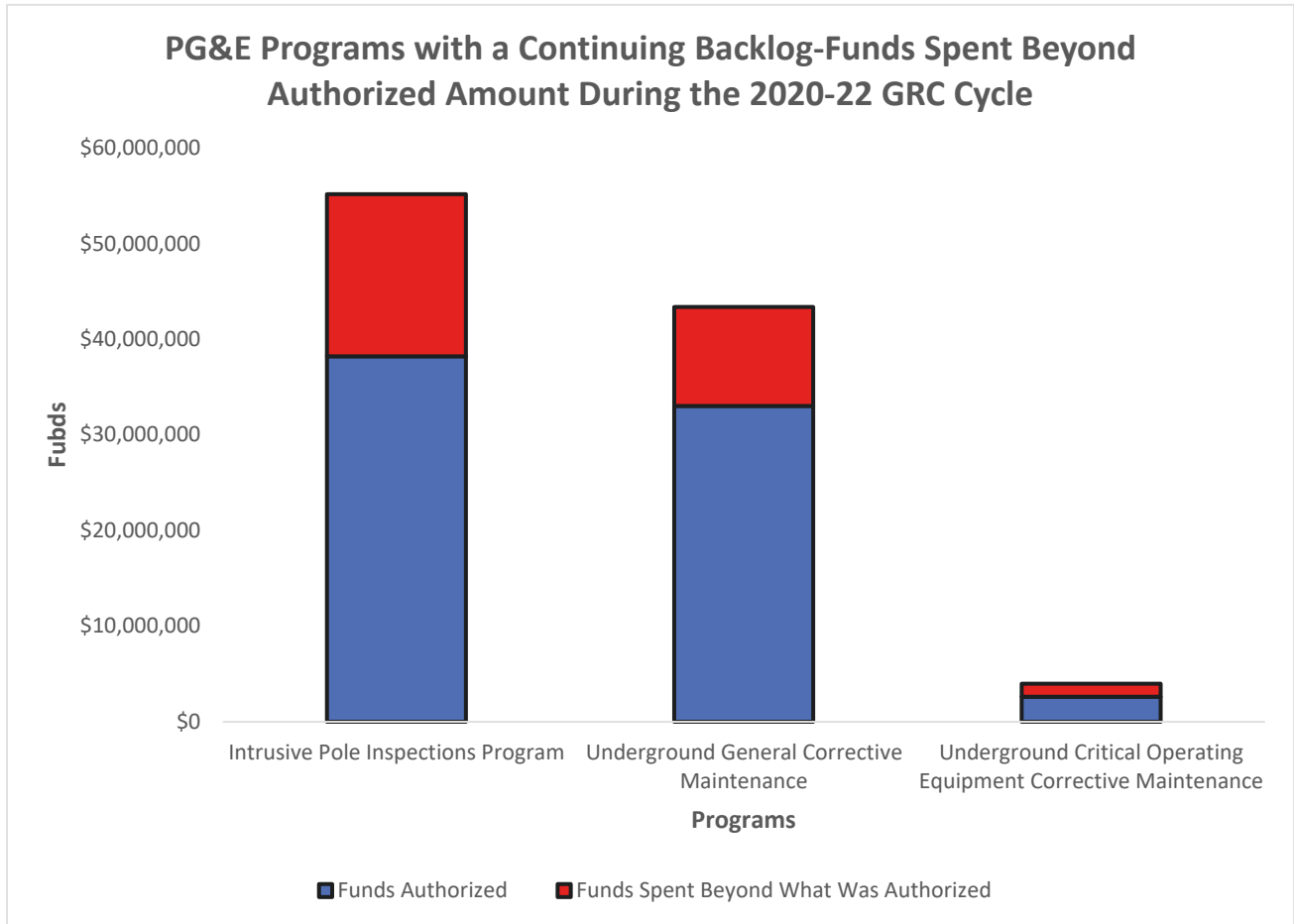
<sup>46</sup> PG&E's 2023 RSAR, Table 3-3, line 89 at 3-6.

**Figure 6: Funds Not Accounted for in the 2020-2022 GRC Cycle for Programs with a Continuing Backlog<sup>47</sup>**



<sup>47</sup> PG&E’s 2022 RSAR, Table 3-3 line 42 at 3-5 and Table 3-4 line 27 at 3-12.

**Figure 7: Funds Spent Beyond What Was Authorized During the 2020-22 GRC Cycle For PG&E Programs with a Continuing Backlog<sup>48</sup>**



Because each of these programs are important to the safety and reliability of PG&E’s electric facilities, they should be timely completed to mitigate risks to the public. PG&E’s Overhead Conductor Replacement program, for example, is an important mitigation for wires down. According to PG&E, the Overhead Conductor Replacement Program “proactively replaces overhead conductor in non-high fire threat district areas to address elevated rates of wires down and deteriorated/damaged conductors and to improve system safety, reliability, and integrity.”<sup>49</sup> Deteriorated

<sup>48</sup> PG&E’s 2022 RSAR, Table 3-3 lines 76, 168, and 169.

<sup>49</sup> A.21-06-021, Exh. PG&E-04 at 13-28.

conductor is a significant contributor to utility wire-down events, as well as overloads and resultant failure.<sup>50</sup> PG&E continues to report thousands of wires down events each year.<sup>51</sup> PG&E reports that its Overhead Conductor Replacement is a program to address this hazard.<sup>52</sup> However, PG&E, states that it has completed only 36% of the work authorized for 2023 for its Overhead Conductor Replacement.<sup>53</sup> As the 2023 Independent Safety Monitor Report states, “Overhead Conductors have been responsible for 101 (55%) of the 183 equipment failure ignitions reported in the High Fire Risk Area (HFRA) between 2017 and 2022.”<sup>54</sup>

Intrusive Pole Inspections ensure that poles do not fail and cause an ignition. According to PG&E, this program is designed to “ensure the poles are in good condition and prevent premature failure in accordance with GO 165.”<sup>55</sup> PG&E further states in its 2023-25 Wildfire Mitigation Plan that “[t]hese inspections seek to identify asset conditions (primarily wood pole decay) which could lead to an ignition.”<sup>56</sup> Pole failure is a contributor to PG&E’s CPUC-reportable ignitions, with 28 such ignitions stemming

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<sup>50</sup> PG&E Independent Safety Monitor Status Update Report, Filsinger Energy Partners, April 3, 2023 (referred to as “the PG&E 2023 Independent Safety Monitor Report”), at 12-13. Available at: <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/safety-policy-division/reports/ism-status-update-report-q3-2023.pdf>

<sup>51</sup> PG&E’s 2023 Safety Performance Metrics Report in Compliance with D.19-04-020 and D.21-11-009, April 1, 2024, at 5-3, 5-6; in R.20-07-013, A.20-06-012, and A.21-06-021.

<sup>52</sup> A.21-06-021, Exh. PG&E-04 at 13-28.

<sup>53</sup> PG&E’s 2023 RSAR, Table 3-4, Line 27 at 3-12.

<sup>54</sup> PG&E 2023 Independent Safety Monitor Report at 13.

<sup>55</sup> PG&E’s 2023 RSAR at 3-7.

<sup>56</sup> PG&E’s 2023-25 Wildfire Mitigation Plan, January 8, 2024, at 394, available at <https://energysafety.ca.gov/what-we-do/electrical-infrastructure-safety/wildfire-mitigation-and-safety/wildfire-mitigation-plans/2023-wildfire-mitigation-plans/>.

from pole failure in the last four years (one of which caused a fire that burned over 300 acres).<sup>57</sup> <sup>58</sup> <sup>59</sup> <sup>60</sup> <sup>61</sup>

Underground Manhole inspections, which ensure manholes do not pose a threat to the public, have been neglected for the last two years. PG&E states in its 2022 RSAR that its reason for not completing any of the underground manhole inspection work authorized in 2022 is that it “decided not to inspect manholes in 2022.”<sup>62</sup> PG&E then states that it “will continue this type of work into the 2023 GRC cycle.”<sup>63</sup> However, in its 2023 RSAR, PG&E states that it again opted not to perform this work “due to prioritization to other work in MWC BF.”<sup>64</sup> Thus, PG&E appears to be renegeing on its statement in its 2022 RSAR that it would continue manhole inspections in the 2023-26 GRC cycle. PG&E’s failure to inspect manholes increases the risk of manhole explosions, such as one that took place in 2023 that caused significant property damage and left 391 customers without power.<sup>65</sup>

Underground General Corrective Maintenance, another important program for electric safety and reliability, is “designed to improve system reliability, improve safety,

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<sup>57</sup> PG&E’s 2022 Fire Incident Data, submitted to Safety and Enforcement Division on April 1, 2023.

<https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/safety-and-enforcement-division/reports/fire-incidents/pge-2022-cpuc-fire-incident-data.xlsx>

<sup>58</sup> PG&E’s 2021 Fire Incident Data, submitted to Safety and Enforcement Division on April 1, 2022

[https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/safety-and-enforcement-division/reports/fire-incidents/2021\\_pge-fire-incident-data-collection-report.xlsx](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/safety-and-enforcement-division/reports/fire-incidents/2021_pge-fire-incident-data-collection-report.xlsx)

<sup>59</sup> PG&E’s 2020 Fire Incident Data, submitted to Safety and Enforcement Division on April 1, 2021.

<sup>60</sup> Please see Figure 1, from T&D World, “Wildfire Mitigation Products and Solutions”, February 26, 2020 Executive Summary at 2: 151 California reported ignitions due to pole failure (graphic shown below).

<sup>61</sup> PG&E’s 2023 Fire Incident Data, submitted to Safety and Enforcement Division on April 1, 2022.

<sup>62</sup> PG&E’s 2022 RSAR at 3-5.

<sup>63</sup> PG&E’s 2022 RSAR at 3-5.

<sup>64</sup> PG&E’s 2023 RSAR at 3-5.

<sup>65</sup> San Francisco Chronicle, “Explosion spews from PG&E manhole, rocks S.F.’s Pacific Heights neighborhood”. Available at: <https://www.sfchronicle.com/bayarea/article/pg-e-manhole-explosion-in-san-francisco-18191775.php>.



and ensure regulatory compliance by correcting abnormal maintenance conditions related to PG&E’s underground facilities.”<sup>66</sup> Underground Critical Operating Equipment maintenance includes items essential for the operation of the system in a safe and reliable manner, such as protective devices and voltage regulators.<sup>67</sup> As noted in Cal Advocates’ comments on PG&E’s 2022 RSAR, failure to complete corrective maintenance on underground equipment increases the risk of blackouts or other major event with significant customer impacts.<sup>68</sup> For example, on April 26, 2023, an underground equipment fire caused an outage in San Francisco that impacted nearly 10,000 customers.<sup>69</sup> One business reported a loss of approximately \$50,000 due to the outage.<sup>70</sup> The impacts of such outages can extend beyond monetary losses and include deaths as well as an increase in illness.<sup>71, 72</sup>

PG&E should clarify when it will complete this work or the reasons why it will not complete this work in the 2023-26 GRC cycle. PG&E also should explain why it continues to not account for the work it did not complete during the 2020-22 GRC cycle. To mitigate the resultant safety risks to the public caused by PG&E’s failure to complete these programs, the Commission should require PG&E to file a corrective action plan.

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<sup>66</sup> A.20-06-021, PG&E 2023 GRC, Exh. 04 Volume 2 at 11-33.

<sup>67</sup> See A.20-06-021, PG&E 2023 GRC, Exh. 04 Volume 2 at 11-35.

<sup>68</sup> Cal Advocates’ Comments on PG&E’s 2022 RSAR at 10-14.

<sup>69</sup> KTVU News, “Underground transformer catches fire, knocks out power for thousands in San Francisco”, April 26, 2023. (Attachment 9)

<https://www.ktvu.com/news/power-outage-affects-san-franciscos-north-beach-nob-hill-chinatown-and-financial-district>

<sup>70</sup> ABC News, “SF business says they will lose \$50,000+ due to power outage caused by underground fire”, April 27, 2023.

<https://abc7news.com/power-outage-pge-san-francisco-customers-affected/13190255/>

<sup>71</sup> Bell, G. Brooke Anderson and Michelle L. "Lights out: Impact of the August 2003 power outage on mortality." *Epidemiology*, 2012: 189-193. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3276729/>

<sup>72</sup> Christine Dominianni, Kathryn Lane, Sarah Johnson, Kazuhiko Ito, and Thomas Matte. "Health Impacts of Citywide and Localized Power Outages in New York City." *Environmental Health Perspectives*, June 2018: 067003-1 - 067003-12. <https://pubmed.ncbi.nlm.nih.gov/29894117/>

This corrective action plan should describe how PG&E will complete the authorized work that it failed to complete in 2023 as well as the 2020-22 GRC period. If PG&E believes that any authorized work is no longer necessary for safety and reliability, PG&E should include a justification in the corrective action plan for why such work is no longer necessary, as well as what PG&E will do with the funds allocated for such work. If additional funding is required, shareholders should be required to provide such funding since ratepayers have already funded the work once.

**C. The Commission should require PG&E to file a corrective action plan that sets forth how it will complete work in 16 electric distribution capital programs during the 2023-2026 GRC period.**

PG&E reports in its 2023 RSAR that it has not completed work in 16 different electric distribution capital programs. According to PG&E, it has diverted resources to other programs such as Emergency Replacements, Capacity Work, and Wildfire Mitigation Plan (WMP) Compliance.<sup>73</sup> It states that the drivers of such diversion include customer requests for service, WMP Compliance, Increased Emergency Replacements, and substation capacity work and equipment replacements.<sup>74</sup>

Specifically, PG&E has failed to complete work in the following programs:

- Overhead Conductor Replacement
- Underground Critical Operating Equipment Replacement
- Substation Equipment Replacements
- Substation Breaker Replacements
- Substation Switch Replacements
- Substation Switchgear Replacements

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<sup>73</sup> The Major Work Categories that PG&E states it is diverting funds to include Electric Distribution Line Capacity (MWC 06), Electric Work Requested By Others (MWC 10), Residential Connections (MWC 16), Installation and Replacement of Overhead Poles (MWC 07), General Overhead Replacements (MWC 2A), Electric Distribution Routine Emergency (MWC 17), Substation Capacity (MWC 46), and Substation Emergency Replacements (MWC 59). See PG&E Response to Cal Advocates data request 1 Question 1(a).

<sup>74</sup> PG&E response to Cal Advocates Data Request One, Question 1(a).

- Substation Civil Structure Replacements
- Fault Location, Isolation, and Restoration (FLISR) Installation
- LED Streetlight Conversions
- Ceramic Post Insulators
- Underground Cable Replacements
- Underground Cable Injections
- Network Cable Replacements
- Underground Switch Replacements.<sup>75</sup>
- Underground Temperature Indicator Installations.<sup>76</sup>

Approximately \$155 million in ratepayer funds were diverted from these programs.<sup>77</sup> The percentage of work completed in each program is displayed in Figure 8.

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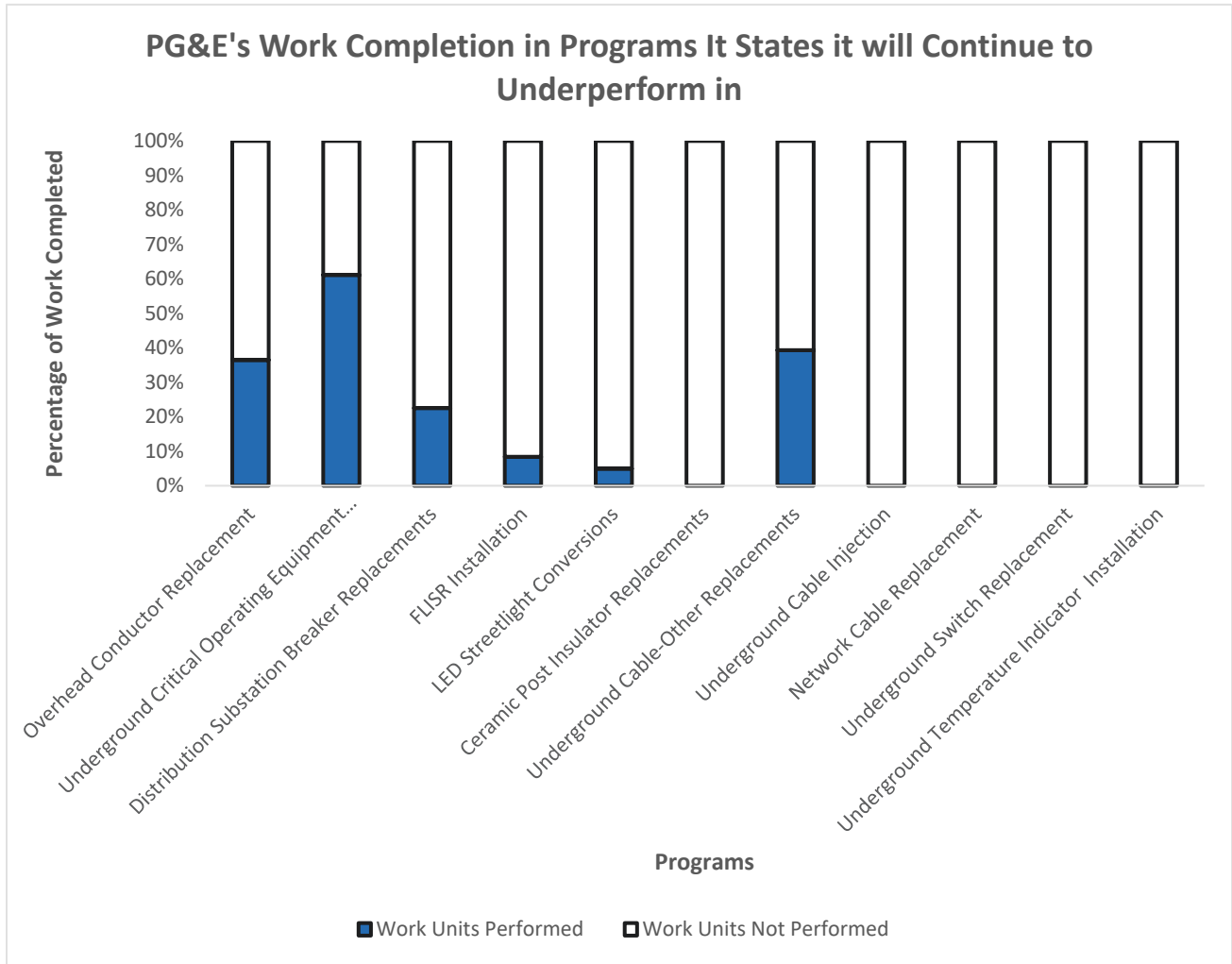
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<sup>75</sup> MAT Codes 08J, 2BD, 48A, 48D, 48E, 48F, 48H, 49S, 2AH, 2AQ, 56A, 56B, 56, 56S, and 56T.

<sup>76</sup> PG&E's 2023 RSAR, Table 3-4.

<sup>77</sup> Derived from PG&E's 2023 RSAR, Table 3-4.

**Figure 8: PG&E’s Work Completion in Programs  
it States it Will Continue to Underperform In<sup>78</sup>**



PG&E states that its changes to prioritization will “continue to impact” these programs for the duration of the 2023-26 GRC cycle.<sup>79</sup> This is unacceptable. PG&E has identified these programs as critical for the safety and reliability of its electric facilities, and ratepayer funds were allocated for these programs in D. 23-11-069 based on PG&E’s

<sup>78</sup> PG&E’s 2023 RSAR, Table 3-4, lines 27, 98, 128, 136, 184, 76, 87, 202, 204, 209, 212, and 214, at 3-12 to 3-19.

<sup>79</sup> PG&E response to Cal Advocates data request 1 Question 1(a).

justifications for these specific programs.<sup>80</sup> Underground Critical Operating Equipment Replacement, for example, is important for preventing customer outages due to failure of underground equipment, as are underground and network cable replacements.<sup>81</sup> Further, the Commission should investigate PG&E’s reprioritization and require PG&E to file a corrective action plan to complete the work that was authorized for each of these programs in D.23-11-069.<sup>82</sup>

**D. The Commission should require PG&E to file a corrective action plan that sets forth how it will complete work in its Vintage Pipe program and expedite its now halted Vintage Pipe Replacement Program.**

PG&E states that its Vintage Pipe Program is a “a continuing effort to address pipelines that are threatened by a combination of construction defects and outside forces such as land movement.”<sup>83</sup> PG&E’s 2024 Gas Safety Plan states that its program to replace vintage pipe (which includes the Vintage Pipe program reported in PG&E’s 2023 RSAR as well as “other replacement and retirement programs”)<sup>84</sup> has been ongoing since 2015. In 2019 PG&E identified 123 miles of high-risk vintage pipeline, and has replaced or addressed 98.75 miles.<sup>85</sup> However, PG&E’s annual progress on this program has

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<sup>80</sup> Decision (D.) 23-11-069 *Decision on Test Year 2023 General Rate Case of Pacific Gas and Electric Company*, November 16, 2023.

<sup>81</sup> For examples of catastrophic events due to underground equipment failure, see: ABC News, “SF business says they will lose \$50,000+ due to power outage caused by underground fire”, April 27, 2023; ABC News, “SF business says they will lose \$50,000+ due to power outage caused by underground fire”, April 27, 2023.

<sup>82</sup> Decision (D.) 23-11-069 *Decision on Test Year 2023 General Rate Case of Pacific Gas and Electric Company*, November 16, 2023.

Decision (D.) 23-11-069 *Decision on Test Year 2023 General Rate Case of Pacific Gas and Electric Company*, November 16, 2023.

<sup>83</sup> PG&E’s 2023 RSAR, Table 2-10, line 46. at 2-69.

<sup>84</sup> PG&E response to Cal Advocates data request 4, Question 12a.

<sup>85</sup> PG&E’s 2024 Gas Safety Plan at 61.

seemingly come to a halt, PG&E reports that it did not complete any work in its Vintage Pipe Program for the year 2023.<sup>86</sup>

**Figure 9: PG&E's Vintage Pipe Replacement Program Progress**<sup>87, 88, 89</sup>

Year	Miles Replaced	Additional Miles Addressed
<b>Pre-2015</b>	20.20	1.30
<b>2015</b>	5.90	12.70
<b>2016</b>	6.70	8.80
<b>2017</b>	3.50	11.50
<b>2018</b>	20.60	0.00
<b>2019</b>	2.06	0.75
<b>2020</b>	1.32	0.00
<b>2021</b>	3.22	0.00
<b>2022</b>	0.15	0.00
<b>2023</b>	0.05	0.01
<b>Cumulative Miles Replaced or Addressed to Date</b>	98.75 miles	
<b>Program Target</b>	123 miles	

<sup>86</sup> MAT Code 75E.

<sup>87</sup> 2024 Gas Safety Plan, Pacific Gas & Electric Company (“PG&E’s 2024 Gas Safety Plan”) at 61.

<sup>88</sup> Work completed in 2023 was under the Geo-Hazards Mitigation (MAT Code 75K) and Water Levees and Crossings (MAT Code 75J) programs- PG&E response to Cal Advocates data request 4 Question 12c.

<sup>89</sup> Figure 9 shows the total miles replaced and the total additional miles addressed, ending with the program target of 123 miles.

As Figure 9 shows, PG&E completed only a fraction of a mile of pipe replacement in 2023 and 2022, a significant decrease in progress compared to previous years. This work is critical to lowering the risk of pipeline failure and resultant property damage or customer injury. When discussing this program, PG&E quotes a November 2011 incident in Morgan County, OH in which two homes and a nearby structure were destroyed by a pipeline failure. The root cause was the interaction between a landslide and a hydrogen-assisted cold crack in the pipe.<sup>20</sup> PG&E created this program to prevent such catastrophic events and asserts that this program was created with the assistance of a Joint Industry Project Team that was formed following this and “other such incidents.”<sup>21</sup> More recently, in March 2019, a landslide in Virginia caused a rupture and subsequent explosion of a 16 inch pipeline, which cut off service to more than 12,000 customers, further illustrating the potential consequences of a landslide-induced pipeline rupture.<sup>22</sup>

PG&E has only completed a fraction of a mile in its broader Vintage Pipe Replacement Program in the last two years.<sup>23</sup> Given the risk to the public posed by this vintage pipe not being replaced, the Commission should require PG&E to file a corrective action plan to complete its authorized work in MAT Code 75E as well as a plan to complete its outstanding work in its broader Vintage Pipe Replacement Program (as discussed in its 2024 Gas Safety Plan).

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<sup>20</sup> A.21-06-021, Exh. PG&E-03 at 5-76.

<sup>21</sup> A.21-06-021, Exh. PG&E-03 at 5-76.

<sup>22</sup> Akbar Vasseghi, Ebrahim Haghshenas, Aram Soroushian, Masoumeh Rakhshandeh, Failure analysis of a natural gas pipeline subjected to landslide, *Engineering Failure Analysis*, Volume 119, 2021, 105009, ISSN 1350-6307, <https://doi.org/10.1016/j.engfailanal.2020.105009> .  
(<https://www.sciencedirect.com/science/article/pii/S1350630720315338>)

<sup>23</sup> See Figure 7 above.

**E. The Commission should further investigate the programs with the highest redirection of funds, unit backlogs, and work overcompletions.**

Appendix A identifies the programs with the highest redirection of funds, unit backlogs, and work overcompletions. Specifically, Appendix A includes eight categories: (1) O&M Funds Not Accounted For by Dollar Amount; (2) O&M Overspends by Dollar Amount; (3) Work Unit Backlogs; (4) Work Unit Overcompletions; (5) Capital Program Work Unit Backlogs; (6) Program Work Unit Overcompletions; (7) Capital Program Funds Not Accounted For; and (8) Capital Program Overspends.<sup>24</sup> The Commission should investigate each of these programs to ensure that PG&E prudently spent ratepayer funds and completed the work necessary to ensure the safety and reliability of PG&E's electric and gas systems. In cases where PG&E did not prudently spend funds or complete necessary work, the Commission should require PG&E to file a corrective action plan showing how PG&E will complete the necessary work or show that such work is no longer necessary.

**F. The Commission should institute an oversight process to ensure that PG&E and other utilities catch up on incomplete safety and reliability work or justify why such work is no longer needed.**

**1. The lack of an oversight process for RSAR filings leaves gaps in important safety work.**

The Commission should implement an oversight process of PG&E and other utilities' RSAR filings. The goal of this oversight process is to ensure that utilities timely complete authorized and necessary safety and reliability work. This oversight process is needed to close gaps in safety and reliability work and prevent catastrophic events.

Under the current RSAR process, utilities submit annual RSAR filings.<sup>25</sup> These report on deviations between approved and actual safety and reliability spending and

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<sup>24</sup> See Appendix A. Cal Advocates does not comment here on why these programs are underspent, overspent, overcompleted, or under-completed, but instead provides the results of its analysis for the Commission's further review and investigation.

<sup>25</sup> D.22-10-002 at 8.



activities.<sup>96</sup> In their annual RSAR filings, utilities are required to report information about programs, expenditures, work completed, and status.<sup>97</sup> Among other things, utilities must track cumulative expenditures throughout the GRC cycle (“cumulative tracking requirement”) and the “completion status” of each program.<sup>98</sup>

The Commission intended for the data in the RSAR filings to be “extremely useful for oversight and tracking purposes.”<sup>99</sup> However, aside from the Energy Division’s annual review of RSAR filings, there is no oversight process in place.<sup>100</sup> For example, utilities’ RSAR filings are not required to include plans discussing how the utility will complete safety and reliability activities that were authorized but incomplete (RSAR Action Plan).<sup>101</sup> And there is no process to ensure that utilities either catch up on incomplete safety and reliability work or justify why such work is no longer necessary.<sup>102</sup> Utilities’ failure to spend authorized funds on safety and reliability activities can contribute to catastrophic events and lead to damage, injuries, and fatalities.<sup>103</sup> Therefore, it is critical for the Commission to implement an oversight process to protect the public.

To address these issues, Cal Advocates recommends the five-step oversight process depicted in Figure 10 below:

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<sup>96</sup> D.19-04-020 at 2.

<sup>97</sup> D.22-10-002, Appendix B.

<sup>98</sup> D.22-10-002 at 41.

<sup>99</sup> D.22-10-002 at 40.

<sup>100</sup> D.22-10-002 at 40-41.

<sup>101</sup> D.22-10-002 at 40-41.

<sup>102</sup> Utilities are required to explain spending and unit variances in their RSARs, but the information they provide is high-level and does not provide the Commission with sufficient information to scrutinize their activities. See D.22-10-002 Appendix A at B-3.

<sup>103</sup> See Senate Bill 549 (2017) (adding Section 591 to the Public Utilities Code), Bill Analysis by Senate Committee on Energy, Utilities, and Communications, March 20, 2017 at 2.

**Figure 10: Cal Advocates' Proposed Oversight Process**



In the first step, the utility will submit an RSAR Action Plan simultaneously with its annual RSAR filing. The RSAR Action Plan should describe how the utility will either complete the necessary safety, reliability, and maintenance work it reported as incomplete or justify why the work is no longer necessary. Intervenors should have the opportunity to comment on it alongside the RSAR, and Safety Policy Division should have the authority to require the utility to revise the plan, approve the plan, and annually oversee the utilities’ progress towards catching up on incomplete work.

If a utility contends that authorized work is no longer necessary, the utility should provide a justification. The Commission can evaluate the utility’s justification during its review of the utility’s RSAR Action Plan. If a utility reprioritizes its safety work, the RSAR Action Plan process will help ensure that the remaining necessary safety and reliability work is timely completed to avoid property damage and/or loss of life or injury caused by utility infrastructure.

The RSAR Action Plan is a critical component of Cal Advocates’ proposed oversight process. Cal Advocates previously recommended that the Commission require the utilities to submit RSAR Action Plans simultaneously with their RSAR filings.<sup>104</sup> But the Commission decided that it did not “foresee the need for an RSAR Action Plan” at that time.<sup>105</sup> Specifically, the Commission determined that the “completion status” and “cumulative tracking” requirements addressed two key components of the RSAR Action

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<sup>104</sup> D.22-10-002 at 40.

<sup>105</sup> D.22-10-002 at 41.

Plan.<sup>106</sup> However, these requirements do not fulfill a foundational objective of the RSAR Action Plan: namely, to explain how a utility will catch up on incomplete safety and reliability work or justify why such work is no longer necessary. Further, PG&E is not accurately capturing the “completion status” of its programs in its RSAR filing.<sup>107</sup>

## **2. PG&E admits that it does not have action plans to catch up on incomplete safety and reliability work.**

In order to evaluate PG&E’s 2023 RSAR, Cal Advocates asked that PG&E to describe its plans and timelines to complete 40 authorized safety, reliability, and maintenance programs.<sup>108, 109</sup> PG&E responded that it could not “identify any specific

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<sup>106</sup> D.22-10-002 at 41.

<sup>107</sup> The “completion status” requirement is not working as it should. According to D.22-10-002, the purpose of this requirement is to estimate if a program will be completed as originally scoped. D.22-10-002 at 41.

However, PG&E is not accurately capturing the “completion status” of its programs. For example, PG&E reported its underground general corrective maintenance program as “Proceeding as Planned” even though it did not complete 20% of the work authorized. PG&E’s 2023 RSAR, Table 3-3, line 202 at 3-10.

When Cal Advocates asked PG&E why it reported this program as “Proceeding as Planned,” PG&E stated that it could not predict whether spending in this program would be “higher or lower than what was imputed in the 2023 GRC...therefore ‘proceeding as planned’ is the most appropriate response.” PG&E response to Cal Advocates data request 3 Question 6.

<sup>108</sup> PG&E’s responses to Cal Advocates Data Request 1 Questions 1(e), 2(b), 3(f), 4(e), 5(d), 6(e), 7(e), 8(e), 9(e), and 10(e); Data Request 2 Questions 1(e), 2(e), 3(e), 4(e), 5(e), 6(e), 7(e), 8(e), 9(e), 10(e), and 11(e); Data Request 3 Questions 1(c), 2(c), 3(c), 4(c), 5(c), 6(i), and 7(g); and Data Request 4 Questions 1(e), 3(d), 4(g), 5(g), 6(f), 7(g), 8(e), 9(d), 10(d), and 11(d).

<sup>109</sup> Cal Advocates issued these data requests on June 25, 2024. Then, on July 11, 2024, PG&E objected to Cal Advocates’ data requests on the specious basis that the plans requested were out of the scope of the RSAR. (PG&E’s responses to Cal Advocates Data Request 1 Questions 1(e), 2(b), 3(f), 4(e), 5(d), 6(e), 7(e), 8(e), 9(e), and 10(e); Data Request 2 Questions 1(e), 2(e), 3(e), 4(e), 5(e), 6(e), 7(e), 8(e), 9(e), 10(e), and 11(e); Data Request 3 Questions 1(c), 2(c), 3(c), 4(c), 5(c), 6(i), and 7(g); and Data Request 4 Questions 1(e), 3(d), 4(g), 5(g), 6(f), 7(g), 8(e), 9(d), 10(d), and 11(d).)

On August 7, 2024, Cal Advocates informed PG&E that PG&E’s objections to its data requests lacked merit. (Appendix C.) Specifically, Cal Advocates explained that it has the right to issue discovery at any time and for any purpose related to the scope of its work at the Commission. (Pub. Utilities Code §§ 309.5, 314, D.01-08-062 at 7.) Cal Advocates’ requests are clearly related to its statutory directive to “obtain the lowest possible rate for service consistent with reliable and safe service levels.” (Pub. Utilities Code § 309.5.)

actions plans to complete the program work at the adopted/authorized levels within the 2023 GRC period.”<sup>110</sup>

PG&E’s admission that it does not have action plans to catch up on necessary safety and reliability work that is incomplete should alarm the Commission, as such incomplete work poses risks to the safety of the public. PG&E’s admission underscores the need for an active, ongoing oversight process by the Commission to ensure that PG&E timely completes work to mitigate critical safety risks to the public such as wildfires and gas pipeline ruptures.

### III. CONCLUSION

To mitigate critical safety risks to the public, improve utility transparency and accountability, and ensure just stewardship of ratepayer dollars, Cal Advocates respectfully requests that the Commission adopt the recommendations contained herein.

Respectfully submitted,

/s/ ANGELA WEURTH  
Angela Wuerth  
Attorney for

The Public Advocates Office  
California Public Utilities Commission  
505 Van Ness Ave.  
San Francisco, CA 94102  
Telephone: (415) 703-1083  
Email: [angela.wuerth@cpuc.ca.gov](mailto:angela.wuerth@cpuc.ca.gov)

August 21, 2024

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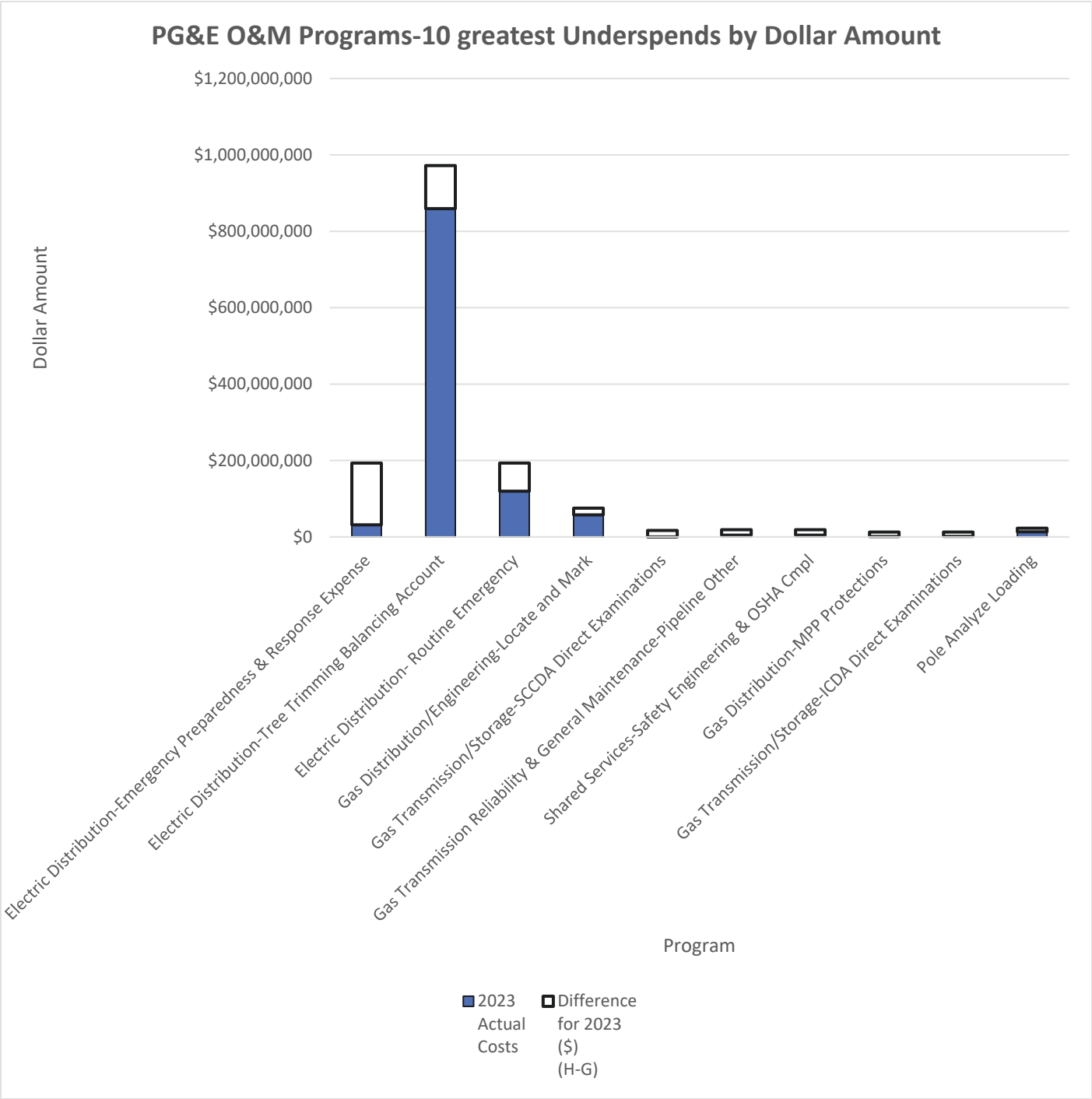
On August 15, 2024, PG&E and Cal Advocates met and conferred on this discovery dispute. (Appendix C; Commission Rules of Practice and Procedure, Rule 11.3). Following the meet and confer, PG&E supplemented its responses to Cal Advocates’ data requests with the following statement: “In response to our outreach, program owners did not identify any specific action plans to complete the program work at adopted/authorized levels within the 2023 GRC period. However, as we explained in our data request responses, all programs are subject to ongoing evaluation and reprioritization. It is thus possible that for certain programs PG&E will make up units less than adopted/authorized levels during the remaining three years of the rate case cycle. The progress for each program against adopted/authorized levels will be transparent because the RSAR requires the IOUs to track cumulative expenditures throughout the GRC cycle and the completion status of each program. D.22-10-002, p. 41.” (Appendix C.)

<sup>110</sup> Appendix C.

## **APPENDIX A:**

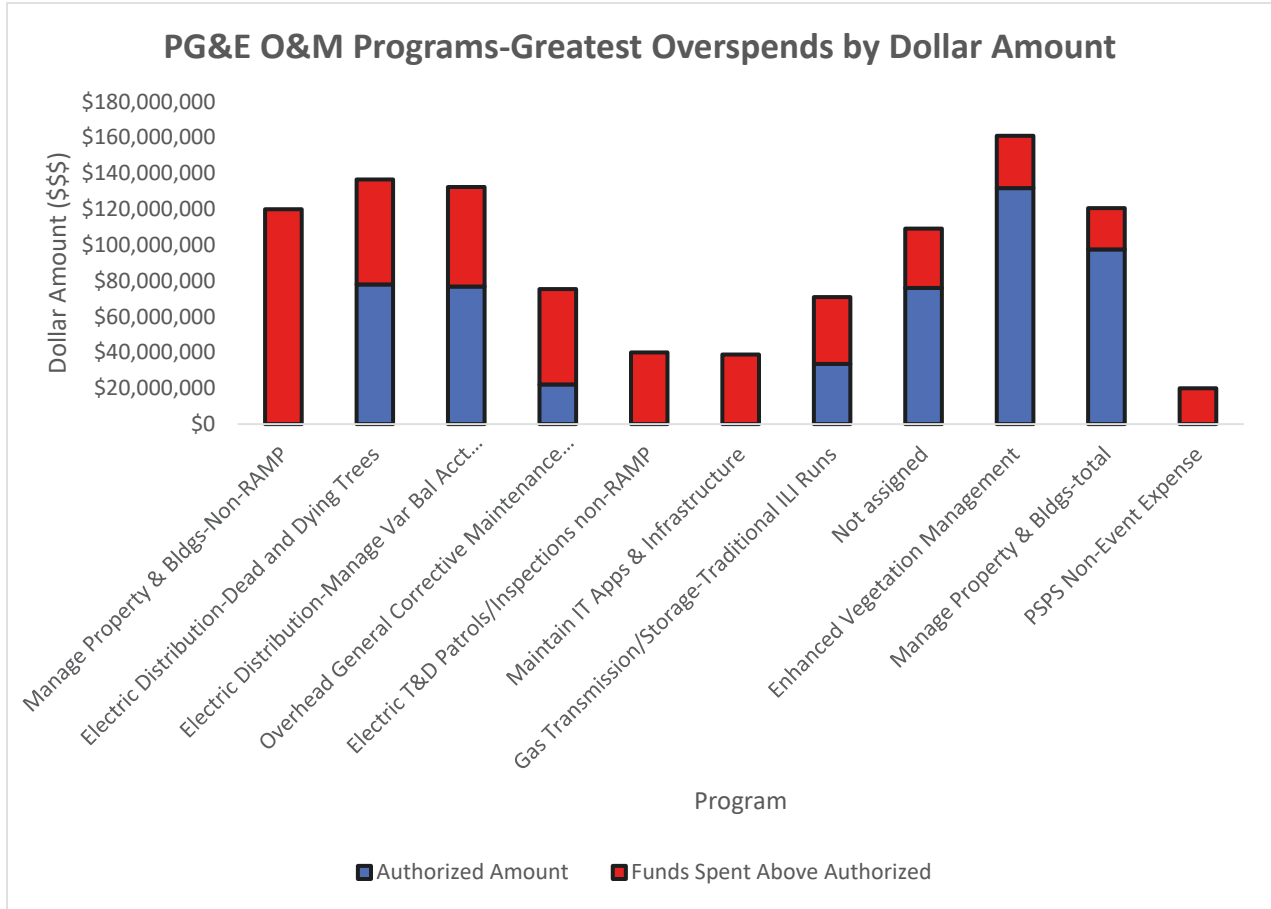
### **Cal Advocates' Identified Top 10 Unaccounted for Funds, Work Non-Completion, and Work Overcompletion for PG&E**

**Figure 11: PG&E's 10 Greatest O&M Funds Not Accounted For by Dollar Amount<sup>1</sup>**



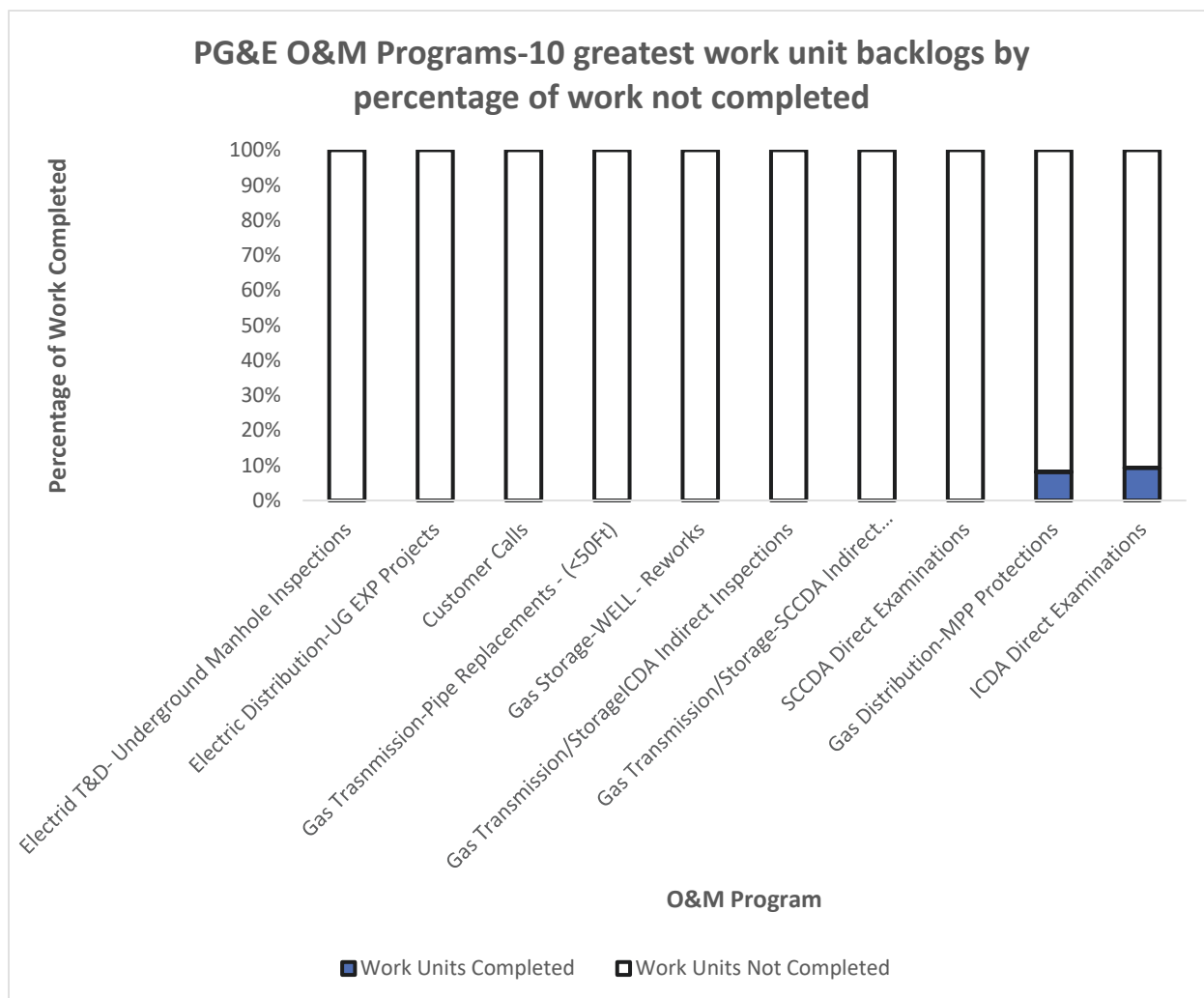
<sup>1</sup> PG&E's 2023 RSAR, Table 3-3 line 1 at 3-4, line 66 at 3-5, and line 93 at 3-7; Table 2-3 line 32 at 2-7, line 55 at 2-8; Table 2-9 line 77 at 2-57, line 79 at 2-57, and line 208 at 2-60; Table 6-3 line 2 at 6-4.

**Figure 12: PG&E's Greatest O&M Overspends by Dollar Amount<sup>2</sup>**



<sup>2</sup> PG&E's 2023 RSAR, Table 3-3 lines 68 at 3-5, 155 at 3-9, 158 at 3-9, 160 at 3-9, and 175 at 3-9; Table 2-9 line 59 at 2-58; Table 6-3 lines 3, 5, and 38 at 6-4.

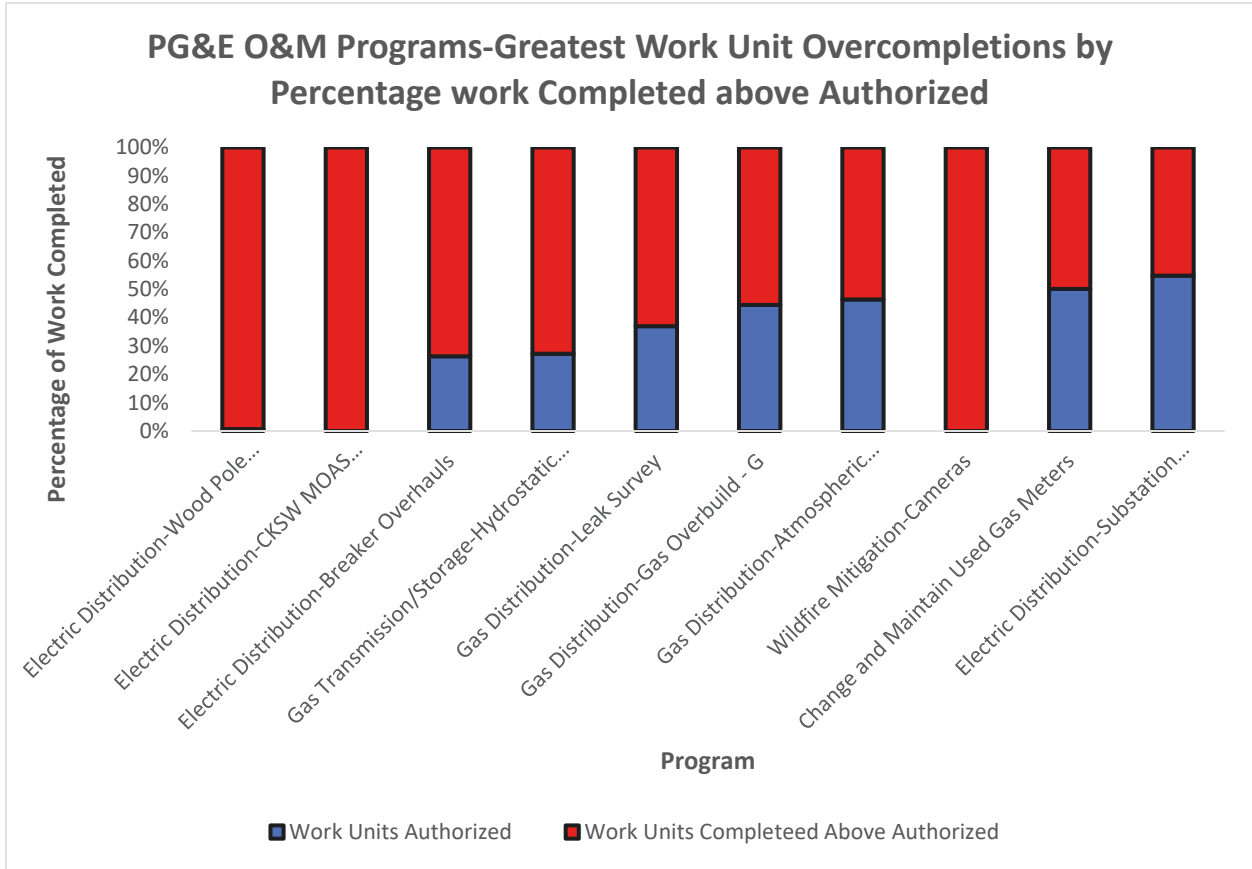
**Figure 13: PG&E's 10 Greatest Work Unit Backlogs<sup>3</sup>**



<sup>3</sup> PG&E's 2023 RSAR, Table 3-3 line 58 at 3-5, line 210 at 3-10; Table 2-3 line 55 at 2-3; Table 2-9 lines 69, 71, and 77 at 2-57.

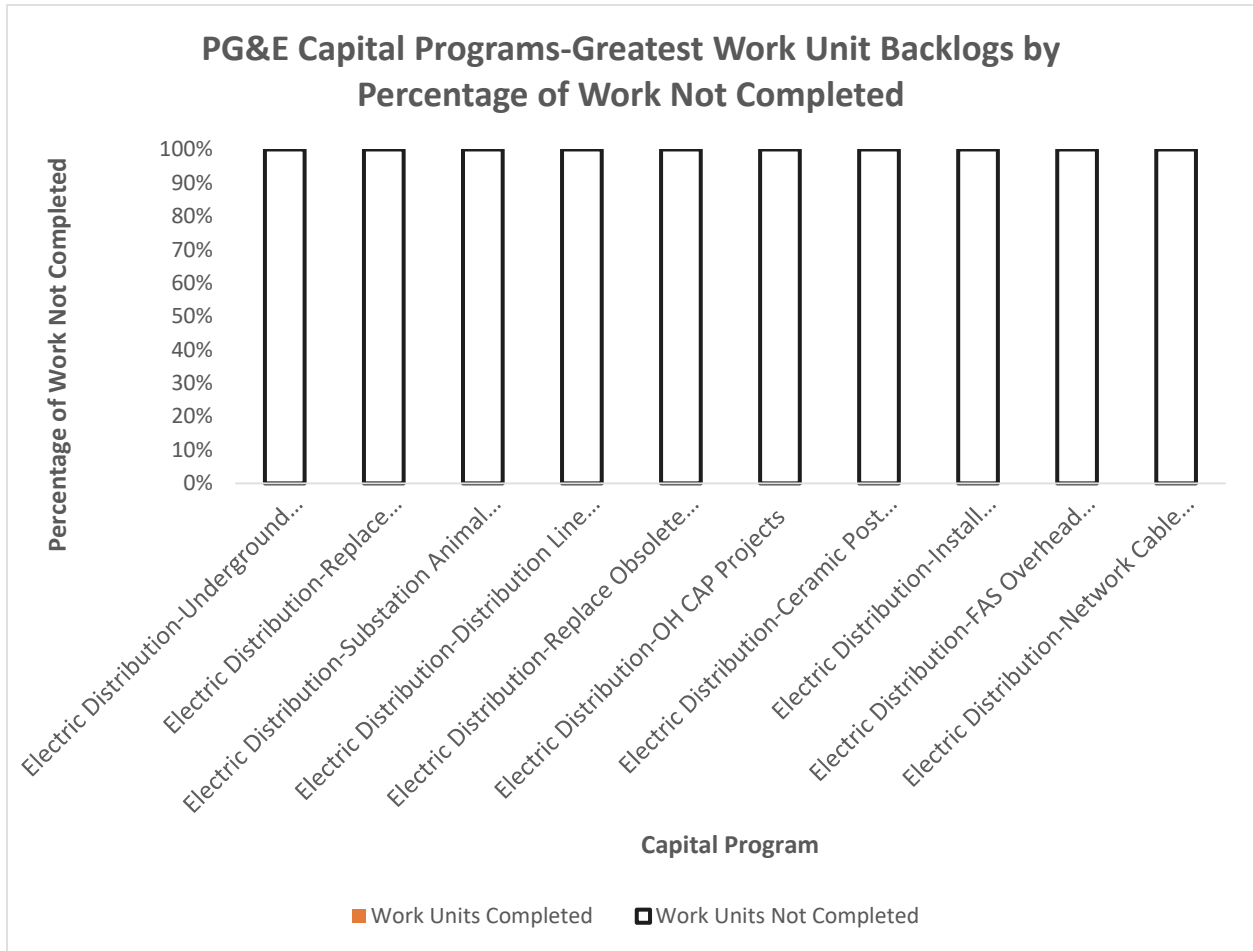


**Figure 14: PG&E's Ten Greatest O&M Work Unit Overcompletions<sup>4</sup>**



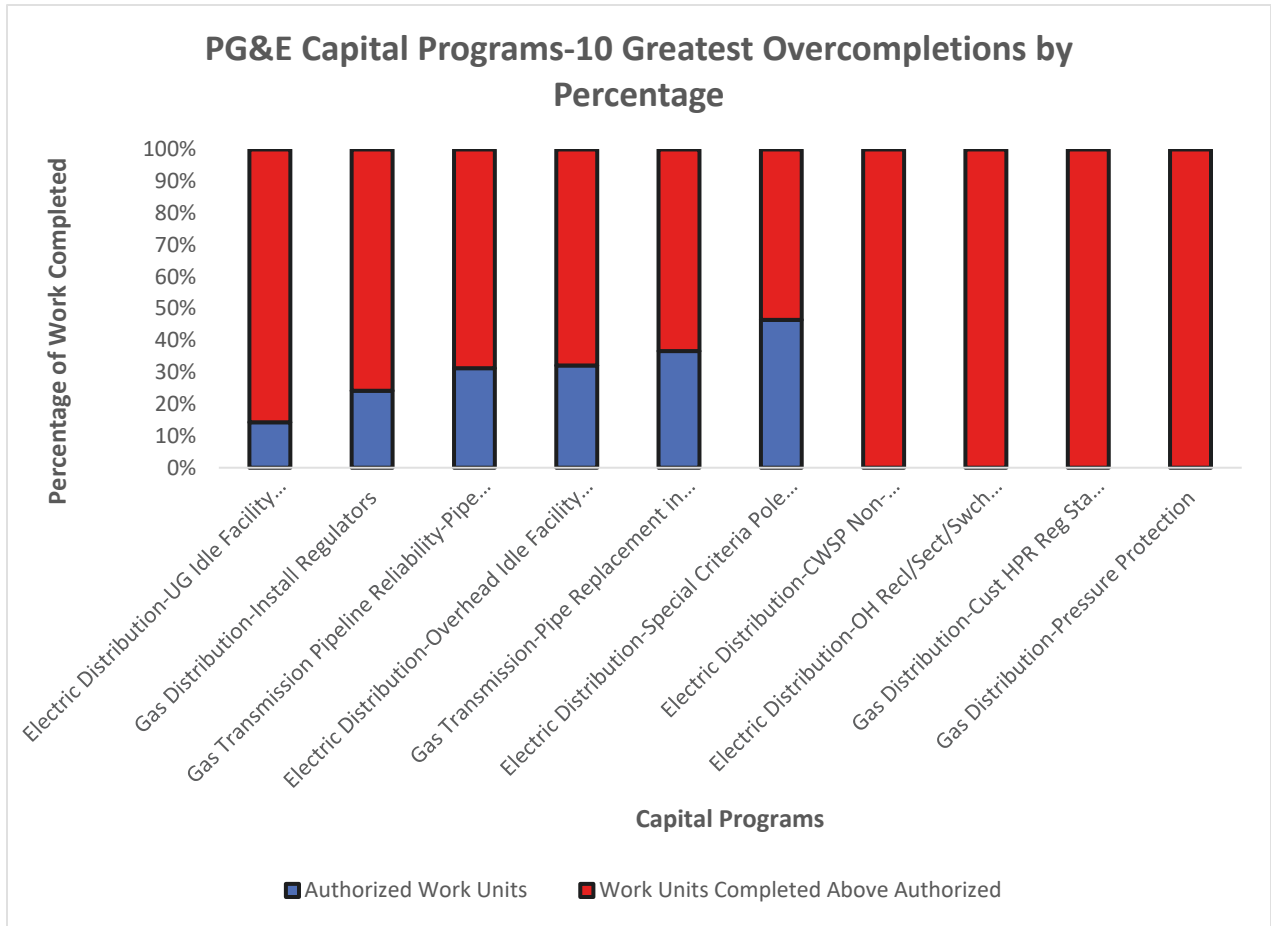
<sup>4</sup> PG&E's 2023 RSAR, Table 3-3 lines 136, 138, and 153 at 3-8, lines 194 and 226 at 3-9; Table 2-3 lines 132 and 137 at 2-5; Table 2-9 line 65 at 2-57.

**Figure 15: PG&E's 10 Greatest Capital Program Work Unit Backlogs<sup>5</sup>**



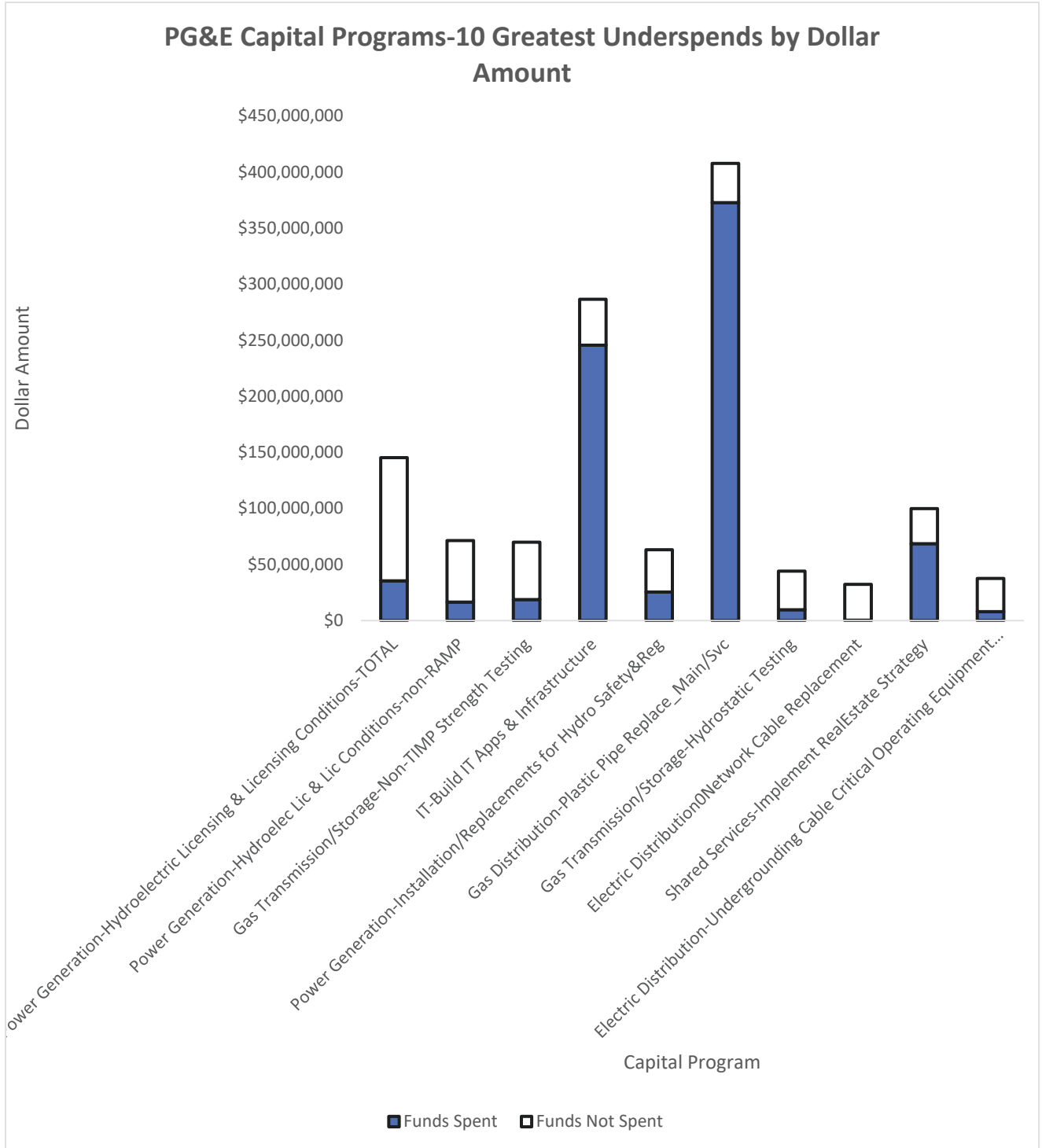
<sup>5</sup> PG&E's 2023 RSAR, Table 3-4 lines 83 and 87 at 3-14, line 91 at 3-15, lines 155 and 157 at 3-17, lines 204 and 209 at 3-18, 212, line 214 at 3-19.

**Figure 16: PG&E's 10 Greatest Capital Program Work Unit Overcompletions<sup>6</sup>**



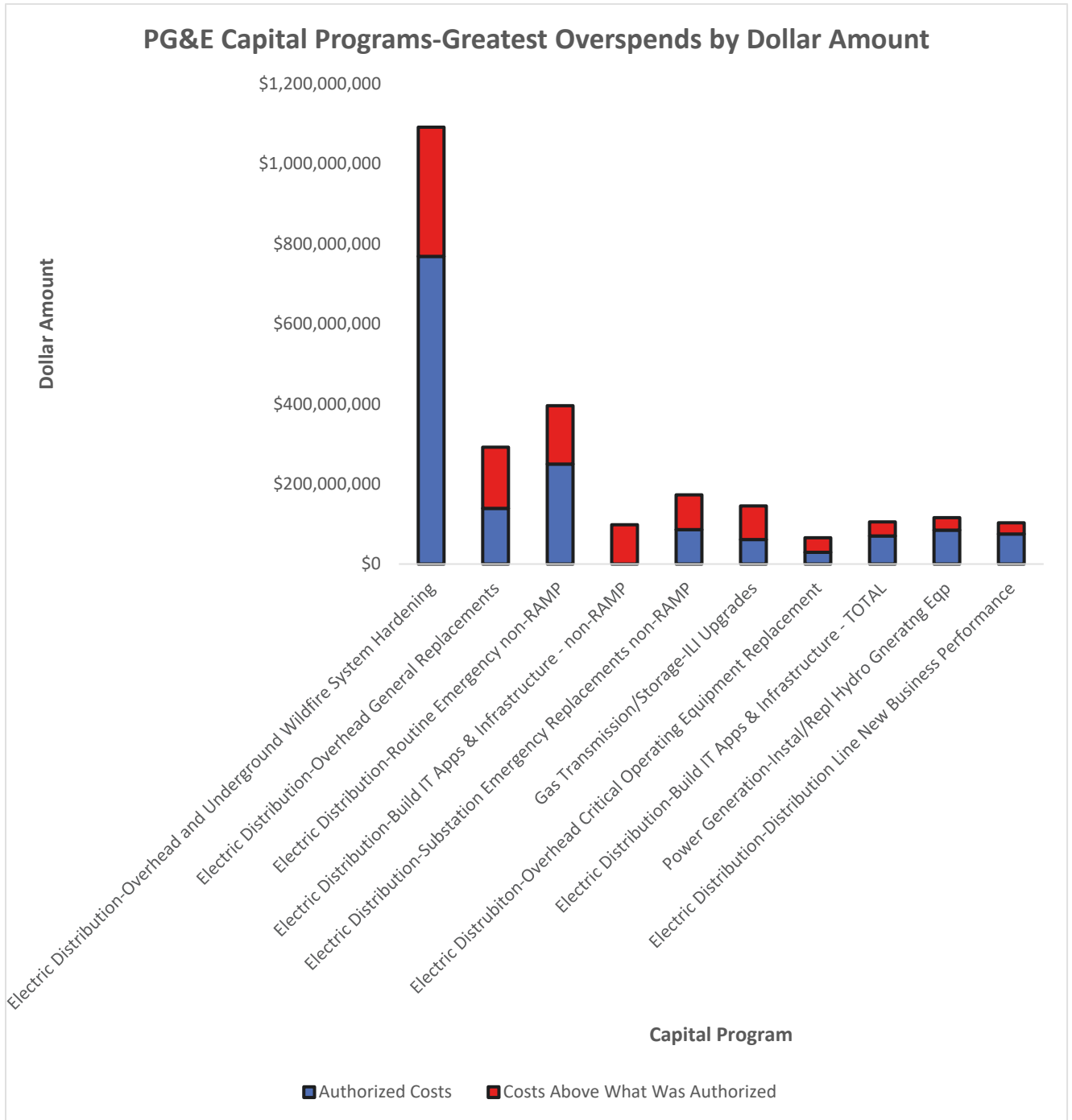
<sup>6</sup> PG&E's 2023 RSAR, Table 2-4 line 10 at 2-13, lines 66 and 69 at 2-15; Table 3-4 line 16 at 3-12, lines 71 and 80 at 3-14, line 100 at 3-15, and line 165 at 3-17.

**Figure 17: PG&E's 10 Greatest Capital Program Funds Not Accounted For<sup>7</sup>**



<sup>7</sup> PG&E's 2023 RSAR Table 4-14 lines 1, 2, and 27 at 4-15; Table 6-4 line 4 at 6-6; Table 2-4 line 5 at 2-13; Table 2-4 lines 206 and 209 at 3-18; Table 2-10 lines 60 and 74 at 2-70.

**Figure 18: PG&E's 10 Greatest Capital Program Overspends<sup>8</sup>**



<sup>8</sup> PG&E's 2023 RSAR, Table 2-10 line 114 at 2-73; Table 3-4 line 10 at 3-12, lines 31 and 46 at 3-13, lines 61 and 69 at 3-14, line 117 at 3-15, lines 223 at 3-19; Table 4-14 line 5 at 4-15.

**APPENDIX B:**

**PG&E Discovery Responses to Cal Advocates**

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Risk Spending Accountability Report Discovery 2023**  
**Data Response**

PG&E Data Request No.:	CalAdvocates_001-Q001		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates_001-Q001		
Request Date:	June 25, 2024	Requester DR No.:	001
Date Sent:	July 11, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

**QUESTION 001**

In line 27 of Table 3-4 of PG&E’s 2023 RSAR, PG&E states that it did not complete 47 circuit-miles of deteriorated overhead conductor replacement (MAT code 08J) compared to what was authorized in the year 2023 (valued at \$27.9 million).<sup>2</sup> PG&E states that this is due to

“reprioritization to System Hardening work in HFTD areas to reduce ignition risk.”

PG&E further states

“For the remainder of the GRC cycle, PG&E anticipates that this program will continue to be lower priority than other work in Electric Distribution like wildfire mitigation and capacity work.”<sup>3</sup>

PG&E requested \$43 million for Mat Code 08J for the year 2023 in its TY 2023 GRC testimony<sup>4</sup> and was authorized to spend \$43 million in D.23-11-069.<sup>5</sup>

- a. Please state the basis for this program continuing to be “lower priority than other work in Electric Distribution like wildfire mitigation and capacity work.”
- b. Why did PG&E request \$43 million for this program for the year 2023 when it anticipates that this is a lower priority program?
- c. When did PG&E become aware that this would be a lower priority program?

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<sup>2</sup> PG&E’s 2023 RSAR at 3-12.

<sup>3</sup> PG&E’s 2023 RSAR at 3-12.

<sup>4</sup> A.21-06-021, Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2023., Exhibit (Exh.) PG&E-4 at 13-30.

<sup>5</sup> Decision (D.) 23-11-069 *Decision on Test Year 2023 General Rate Case of Pacific Gas and Electric Company*, November 16, 2023, at 385.

- d. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program in 2023, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
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- e. Please provide a plan and timeline for completion for the abovementioned incomplete 47 circuit-miles in MAT code 08J in the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step Towards Completion of Incomplete Work	How PG&E will Execute This Step	Beginning Date of Step	End Date of Step
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### ANSWER 001

- a. PG&E regularly evaluates its Electric Distribution portfolio of programs to address changes over the general rate case cycle(s) and to address unanticipated changes and emergent issues and circumstances. As program and funding needs change or emerge, PG&E's focus continues to be to maintain safety, reliability, risk mitigation, and meeting customers' demands. Below are the primary drivers, as of 2023, where the GRC forecast (completed in early 2021) did not align with unanticipated changes and emergent needs, resulting in a reallocation of resources (MWCs with higher-than-forecasted spending). At this time PG&E anticipates these changes will continue to impact PG&Es priorities for the 2023 GRC cycle.
- i. High Customer Demand: Customer requests for service exceeding the GRC forecast for New Business and Distribution Capacity. (MWC 10, 16, 06)
  - ii. WMP Compliance: The emergence of pole and non-pole open tag reduction as a wildfire mitigation as well as a higher unit cost than forecasted/adopted in the GRC for this work. (MWC 07 and 2A)
  - iii. Increased Emergency Replacements: The overall trend of routine emergency repairs is growing above the 3-year average that was used to develop the 2023 GRC request. (MWC 17)
  - iv. Substation Reprioritization: Work within Substation Emergency and Substation Capacity is increasing due to a higher than forecasted volumes of emergency replacements and capacity work due to customer requests. (MWC 46 and 59)

While PG&E provides examples in the RSAR of where funding was re-allocated from lower priority work to higher priority work, in general, portfolio-level prioritization (across MWCs) decisions are not made based upon a direct correlation from one program to another. For example, a program may need to decelerate due



to weather, supply chain, or labor force issues resulting in spending less than what was expected or forecasted. The dollars unspent are then re-directed to other programs that can accelerate readily i.e., shovel-ready. The timing of these program and work shifts is not simultaneous or instantaneous. There is a pool of programs that can release resources/funding and a pool of programs that require additional resources/funding. Regular review and calibration within the Electric Distribution portfolio is required to allocate resources/funding from where it can be released, to where additional funding is required.

Given the above drivers, which were not predicted at the time of creating the 2023 GRC forecast, some programs will become lower priority. PG&E must prioritize emerging safety, reliability, and customer demand programs above lower priority programs given financial and other resource constraints.

- b. PG&E’s 2023 GRC Application funding request was based on the best available information at the time of the Application, which was submitted in 2021. After the 2023 GRC revenue requirement was adopted, PG&E’s portfolio of Electric Distribution programs were and are subject to change to address emergent work and funding constraints while maintaining the safety and reliability of PG&E’s electric distribution equipment.
- c. Changes in program implementation do not happen on a given date but are done in response to i) constraints (financial, labor, weather, etc.), and ii) emergent work and changed circumstances that affect PG&E’s Electric Distribution portfolio over time.
- d. As stated in the RSAR, in 2023, “Program expenditures were below imputed regulatory values due to reprioritization to System Hardening work in HFTD areas to reduce ignition risk.” PG&E also stated, “For the remainder of the GRC cycle, PG&E anticipates that this program will continue to be lower priority than other work in Electric Distribution like wildfire mitigation and capacity work.” See also the response to question a. above.

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
08/3U	E Dist Replace OH Asset	08W/3UG	Wildfire Resiliency projects	PG&E prioritizes wildfire mitigation over proactive replacement of equipment in non HFTDs.
06	E Dist. Line Capacity	06A, 06H	Fdr Prj Assoc w/Subst Capacity, Dist Line New Business Perf	PG&E has an obligation to serve customers, and that includes the corresponding capacity upgrades.

- e. PG&E objects to this question on the ground that plans and timelines for completion of programs are beyond the scope of RSAR. In the Risk OIR (R.20-07-013), Cal Advocates proposed that utilities be required to provide an “RSAR Action Plan” including anticipated completion dates or a justification as to why the work cannot be

completed within the expected timeline. The Commission rejected this proposal stating:

*We appreciate Cal Advocate's attention to RSAR requirements but do not approve the RSAR Action Plan concept as proposed by Cal Advocates at this time. The IOUs already must report and describe variances at the individual program level within the RSAR. Additionally, this decision requires the IOUs to track cumulative expenditures throughout the GRC cycle and the completion status of each program (see section 3.2.7). The cumulative tracking will identify programs that may have chronic spending variances. The requirement for project status reporting requires IOUs to estimate if a project will be completed as originally scoped. These requirements now address two key components of the Cal Advocates proposed RSAR Action Plan. Based on these improvements to RSAR requirements, we do not foresee the need for an RSAR Action Plan at this time. (D.22-10-002, p. 41.)*

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 001-Q002		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 001-Q002		
Request Date:	June 25, 2024	Requester DR No.:	001
Date Sent:	July 17, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

**QUESTION 002**

In line 76 of table 3-4 of PG&E’s 2023 RSAR, PG&E states that it did not complete 7,608 LED streetlight installations (MAT code 2AH) compared to what was authorized in the year 2023 (valued at \$6.8 million).<sup>6</sup> PG&E states that the reason for this is that

“resources were diverted to higher priority work within MWC 2A like wildfire mitigation work in MAT 2AA [Overhead Notifications].”

PG&E further states that it

“...expects that this program will continue to be lower priority than other work in MWC 2A for the remainder of the GRC cycle.”<sup>7</sup>

PG&E requested \$7.1 million for this program in its 2023 GRC testimony<sup>8</sup> and was authorized to spend \$7.1 million in 2023 on this program in D.23-11-069.<sup>9</sup>

- a. Please state the basis for this program continuing to be “lower priority than other work in MWC 2A for the remainder of the GRC cycle.”
- b. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program in 2023, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity

- c. Why did PG&E request \$7.1 million for the year 2023 in its GRC testimony when PG&E anticipates that this will be a lower priority program?
- d. When did PG&E become aware that this would be a lower priority program?

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<sup>6</sup> PG&E’s 2023 RSAR at 3-14.  
<sup>7</sup> PG&E’s 2023 RSAR at 3-14.  
<sup>8</sup> A.21-06-021, Exh. PG&E-4 at 11-26.  
<sup>9</sup> D.23-110-069 at 373.

- e. Please provide a plan and timeline for completion for the abovementioned incomplete 47 circuit-miles in MAT code 08J in the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step Towards Completion of Incomplete Work	How PG&E will Execute This Step	Beginning Date of Step	End Date of Step
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**ANSWER 002**

- a. Please see PG&E’s response to Question 001 (a.) which provides an Electric Distribution portfolio level explanation of how priorities changed since the GRC was forecasted. Like prioritization across the Electric Distribution portfolio (across MWCs), ongoing reprioritization also occurs within sub-programs (MAT codes) under the same MWC. The program under MAT 2AH (not associated with a risk mitigation) was determined to be a lower priority than MAT 2AA, which has emerged since the 2023 GRC as a wildfire mitigation program.<sup>10</sup>
- b. As stated in the RSAR, PG&E allocated resources to higher priority work in MAT 2AA. Please also see PG&E’s response to Question 001 (a.).

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
2A	E Dist Inst/Repl OH General	2AA	OH Genl Repl	PG&E has prioritized funding of ignition-risk tags that are part of WMP compliance.

- c. Please see PG&E’s response to Question 001 (b.).
- d. Please see PG&E’s response to Question 001 (c.).
- e. Please see PG&E’s response to Question 001 (e.).

<sup>10</sup> 2024 RAMP (A.24-05-008), (PG&E-04), Chapter 1, p. 1-61 through 1-62.

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 001-Q003		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates_001-Q003		
Request Date:	June 25, 2024	Requester DR No.:	001
Date Sent:	July 17, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

**QUESTION 003**

In line 87 of Table 3-4 of PG&E’s 2023 RSAR, PG&E states that it did not complete 2,093 ceramic post insulator replacements (MAT Code 2AQ) for the year 2023 compared to what was authorized (valued at \$6.1 million). PG&E states that this is

“due to the re-prioritization of this work to other capital work in electric distribution, like MAT 2AA.”

PG&E further states that it

“is anticipating that this program will continue to be lower priority in the GRC cycle.”<sup>10</sup>

PG&E requested \$5.8 million in its 2023 GRC testimony<sup>11</sup> and was authorized to spend \$5.8 million on this program in D.23-11-069.<sup>12</sup>

- a. Please state this basis for this program continuing to be lower priority in the GRC cycle.
- b. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program in 2023, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity

- c. Why did PG&E request \$5.8 million for this program in its 2023 GRC testimony when PG&E anticipates this being a lower priority program?
- d. When did PG&E become aware that this would be a lower priority program?

<sup>10</sup> PG&E’s 2023 RSAR at 3-14.

<sup>11</sup> A.21-06-021. Exh. PG&E-4 at 11-29.

<sup>12</sup> D.23-110-069 at 365.

- e. Please provide a plan and timeline for completion for the abovementioned 2,093 ceramic post insulator replacements not performed in 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step Towards Completion of Incomplete Work	How PG&E will Execute This Step	Beginning Date of Step	End Date of Step
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**ANSWER 003**

- a. Please see PG&E’s response to CalAdvocates\_001-Q001a which provides an Electric Distribution portfolio level explanation of how priorities changed since the GRC was forecasted. Like prioritization across the Electric Distribution portfolio (across MWCs), ongoing reprioritization also occurs within sub-programs (MAT codes) under the same MWC. The program under MAT 2AQ (not associated with a wildfire mitigation) was determined to be a lower priority than MAT 2AA, which has emerged since the 2023 GRC as a wildfire mitigation program.<sup>13</sup>
- b. As stated in the RSAR, PG&E allocated resources to higher priority work, like MAT 2AA. Please also see PG&E’s response to Question 001 (a.).

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
2A	E Dist Inst/Repl OH General	2AA	OH Genl Repl	PG&E has prioritized funding of ignition-risk tags that are part of WMP compliance.

- c. Please see PG&E’s response to Question 001 (b.).
- d. Please see PG&E’s response to Question 001 (c.).
- e. Please see PG&E’s response to Question 001 (e.).

<sup>13</sup> 2024 RAMP (A.24-05-008), (PG&E-04), Chapter 1, p. 1-61 through 1-62.

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 001-Q004		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates_001-Q004		
Request Date:	June 25, 2024	Requester DR No.:	001
Date Sent:	July 10, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

**QUESTION 004**

In line 89 of Table 3-4 of PG&E’s 2023 RSAR, PG&E states that it did not complete 3,289 Surge Arrester Replacements (MAT code 2AR) in the year 2023 compared to what was authorized (valued at \$13.3 million). PG&E states that

“Actual program units were below imputed program units because PG&E is conducting the non-HFTD replacements at a slower rate, as explained in the cost variance explanation.

PG&E further states that

“PG&E is working on the non-HFTD units at a slower pace than forecasted in order to allocate resources to higher priority work in MWC 2A.”<sup>13</sup>

PG&E requested \$17.8 million in its 2023 GRC testimony<sup>14</sup> and was authorized to spend \$17.8 million on this program in D.23-11-069.<sup>15</sup>

- a. Please state the basis for the abovementioned allocation of resources to higher priority work in MWC 2A.
- b. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity

- c. Why did PG&E request \$17.8 million in its GRC testimony for this program if it knew it was replacing non-HFTD surge arresters at a lower rate?
- d. When did PG&E become aware that it would be replacing non-HFTD surge arresters at a slower rate?

<sup>13</sup> PG&E’s 2023 RSAR at 3-14.

<sup>14</sup> A.21-06-021. Exh. PG&E-4 at 11-28.

<sup>15</sup> D.23-110-069 at 368.

- e. Please provide a plan and timeline for completion for the abovementioned 3,289 surge arrester replacements not performed in 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step Towards Completion of Incomplete Work	How PG&E will Execute This Step	Beginning Date of Step	End Date of Step
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**ANSWER 004**

- a. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)” which provides an Electric Distribution portfolio level explanation of how priorities changed since the GRC was forecasted. Like prioritization across the Electric Distribution portfolio (across MWCs), ongoing reprioritization also occurs within sub-programs (MAT codes) under the same MWC. As explained in PG&E’s 2023 RSAR, program expenditures in MAT 2AR were below imputed regulatory values due to PG&E’s focus on completing replacements in HFTD Tier 2 and Tier 3 areas in prior years. Beginning in 2023, PG&E began conducting replacements in non-HFTD areas, but at a slower rate than forecasted. This allowed PG&E to allocate resources to higher priority work in MWC 2A.
- b. As stated in the RSAR, PG&E allocated resources from MAT 2AR to higher priority work in MWC 2A. The higher priority work is specifically in MAT 2AA, which addresses open tags and has emerged as a wildfire mitigation for open tag backlog reduction. Please also see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a).”

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
2A	Electric Distribution Preventive Maintenance Overhead	2AA	OH Genl Repl	PG&E has prioritized funding of ignition-risk tags that are part of WMP compliance.

- c. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(b)”
- d. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(c)”
- e. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)”



**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 001-Q005		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 001-Q005		
Request Date:	June 25, 2024	Requester DR No.:	001
Date Sent:	July 18, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

**QUESTION 005**

In line 98 of Table 3-4 of PG&E’s 2023 RSAR, PG&E states that it did not complete 56 underground critical operating equipment replacements (MAT Code 2BD) for the year 2023 compared to what was authorized. However, PG&E overspent by \$1.8 million compared to what was authorized for the program. PG&E states that

“Actual program units were below imputed program units because unit costs were above forecasted. In order to manage overall costs in the 2B program, PG&E did fewer program units in 2BD.”

PG&E further states

“For the GRC cycle, PG&E expects that it will continue to prioritize other work in MWC 2B over work in MAT 2BD. Going forward, PG&E may spend the imputed amount but anticipates completing fewer units than imputed due to the increase in unit costs.”<sup>16</sup>

PG&E requested \$6.9 million in its 2023 GRC testimony<sup>17</sup> and was authorized to spend \$6.9 million on this program in D.23-11-069.<sup>18</sup>

- a. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) that PG&E is prioritizing about MAT Code 2BD, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
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- b. Please list and describe all drivers of the abovementioned increased unit costs for MAT Code 2BD.
- c. Why did PG&E request \$6.9 million for this program in its 2023 GRC testimony when it anticipates prioritizing other work in MWC 2B?

<sup>16</sup> PG&E’s 2023 RSAR at 3-15.

<sup>17</sup> A.21-06-021, Exh. PG&E-4 at 11-36.

<sup>18</sup> D.23-110-069 at 371.

- d. Please provide a plan and timeline for completion for the abovementioned 56 incomplete units of work for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step Towards Completion of Incomplete Work	How PG&E will Execute This Step	Beginning Date of Step	End Date of Step
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**ANSWER 005**

- a. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)” which provides an Electric Distribution portfolio-level explanation of how priorities changed since the GRC was forecasted. Like prioritization across the Electric Distribution portfolio (across MWCs), ongoing reprioritization also occurs within sub-programs (MAT codes) under the same MWC.

The statement that PG&E will continue to prioritize other work in MAT 2B over the work in MAT 2BD is, in this case, meant in terms of units. PG&E may continue to prioritize this program within the imputed adopted costs and achieve the units possible based on the unit costs. MAT 2BD is not a compliance program directly impacting safety, therefore PG&E may not allocate additional resources to achieve the imputed units once the imputed costs are reached in favor of other work in MWC 2B.

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
2B	Electric Distribution Preventive Maintenance Underground	Various	Various	MAT 2BD is not a compliance program directly impacting safety and is lower priority

- b. In 2023, PG&E’s unit costs for MAT 2BD exceeded the forecast by 104%. This includes increased costs for labor (external and internal), contracts, and materials.
- c. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(b).”
- d. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e).”

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 001-Q006		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 001-Q006		
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Date Sent:	July 10, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

**QUESTION 006**

In line 128 of Table 3-4 of PG&E’s 2023 RSAR, PG&E states that it underspent by \$3.6 million compared to what was authorized for the year 2023 for MAT Code 48A (distribution substation replacement-other equipment). PG&E does not report work units for this program, stating,

“This program has no measurable units because there is no standard unit of measure.”

PG&E states regarding this program that

“[i]n 2023, PG&E prioritized substation work (for example in MAT 48L, 54A, and MWC 59) over MAT 48A. For the 2023 GRC cycle, PG&E anticipates that this work will continue to be lower priority than other Substation work.”<sup>19</sup>

PG&E requested \$4.2 million in its 2023 GRC testimony<sup>20</sup> and was authorized to spend \$4.2 million on this program in D.23-11-069.<sup>21</sup>

- a. Please state the basis for this work continuing to be lower priority than other substation work.
- b. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
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- c. Why did PG&E request \$4.2 million in its GRC testimony for this program when it anticipates the program to continue to be lower priority?
- d. When did PG&E become aware that this would be a lower priority program in this rate case cycle?

<sup>19</sup> PG&E’s 2023 RSAR at 3-16.

<sup>20</sup> A.21-06-021, Exh. PG&E-4 at 11-28.

<sup>21</sup> D.23-110-069 at 416.

- e. Please provide a plan and timeline for completion for the abovementioned 56 incomplete units of work for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step Towards Completion of Incomplete Work	How PG&E will Execute This Step	Beginning Date of Step	End Date of Step
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**ANSWER 006**

- a. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)” which provides an Electric Distribution portfolio level view of how priorities changed since we submitted our GRC forecast. Like prioritization across the Electric Distribution portfolio (across MWCs), ongoing reprioritization also occurs within sub-programs (MAT codes) under the same MWC, or in this case under the same business unit (like MWCs under the greater Substation program). The programs under MAT 48L, 54A, and MWC 59 are all Substation programs and in 2023 were higher priority than the program under 48A.

PG&E anticipates that MAT 48A will be a lower priority than other substation work because, for example, substation emergency replacements under MWC 59 is likely to continue to have higher volumes; the replacement of equipment that has already failed is higher priority than proactive replacements. To the extent that the pattern of higher emergency replacements continues, those will take precedence over proactive replacements like in MAT 48A.

- b. As PG&E stated in its 2023 RSAR, in 2023, PG&E prioritized substation work, for example in MAT 48L, 54A, and MWC 59 over MAT 48A. Please also see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a).”

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
59	E Dist Subst Emergency Repl	N/A	N/A	PG&E prioritizes identified failures of equipment over proactive replacement of equipment.
48	E Dist Subst Repl Other Equip	48L	Dist Line Work Support Substat	MAT 48L includes emergency replacements; PG&E prioritizes identified failures of equipment over proactive replacement of equipment.
54	E Dist Subst Repl Transformer	54A	E Dist Subst-Repl Transfm	PG&E prioritizes proactive replacement of

				power transformers with higher reliability risk impacting customers over proactive replacement of other equipment with lower reliability risk.
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- c. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(b)”
- d. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(c)”
- e. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)”

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 001-Q007		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 001-Q007		
Request Date:	June 25, 2024	Requester DR No.:	001
Date Sent:	July 10, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

**QUESTION 007**

In line 133 of Table 3-4 of PG&E’s 2023 RSAR, PG&E states that it did not complete 10 distribution substation battery replacements (MAT Code 48C) for the year 2023 (valued at \$3.4 million). PG&E states

“Actual program units were below imputed program units because of the decision to reschedule proactive battery replacements to support higher priority substation work. Rescheduling of these proactive replacements does not compromise safety or reliability.”

PG&E further states

“In 2023, PG&E prioritized substation work (for example in MAT 48L, 54A, and MWC 59) over MAT 48C. At this time, PG&E anticipates that this program will continue to be prioritized below other substation work.”<sup>22</sup>

PG&E requested \$3.3 million in its 2023 GRC testimony<sup>23</sup> and was authorized to spend \$3.3 million on this program in D.23-11-069.<sup>24</sup>

- a. Please state the basis for prioritizing this work below other substation work.
- b. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
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- c. Why did PG&E request \$3.3 million for this program in its 2023 GRC testimony when it anticipates this program will be prioritized below other substation work?

<sup>22</sup> PG&E’s 2023 RSAR at 3-16.

<sup>23</sup> A.21-06-021, Exh. PG&E-4 at 15-25.

<sup>24</sup> D.23-110-069 at 410.

- d. When did PG&E become aware that this program would be prioritized below other substation work?
- e. Please provide a plan and timeline for completion for the abovementioned 10 distribution substation battery replacements not performed for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step Towards Completion of Incomplete Work	How PG&E will Execute This Step	Beginning Date of Step	End Date of Step
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**ANSWER 007**

- a. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)” which provides an Electric Distribution portfolio level view of how priorities changed since we submitted our GRC forecast. Like prioritization across the Electric Distribution portfolio (across MWCs), ongoing reprioritization also occurs within sub-programs (MAT codes) under the same MWC or in this case, under the same business unit (like MWCs under the greater Substation program). The programs under MAT 48L, 54A, and MWC 59 are all Substation programs and higher priority than the program under 48C.

PG&E anticipates that MAT 48C will be a lower priority than other substation work because, for example, substation emergency replacements under MWC 59 is likely to continue to have higher volumes; the replacement of equipment that has already failed is higher priority than proactive replacements. To the extent that the pattern of higher emergency replacements continues, those will take precedence over proactive replacements like in MAT 48C.

- b. As PG&E stated in its 2023 RSAR, in 2023, PG&E prioritized substation work (for example in MAT 48L, 54A, and MWC 59) over MAT 48C. Please also see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a).”

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
59	E Dist Subst Emergency Repl	N/A	N/A	PG&E prioritizes identified failures of equipment over proactive replacement of equipment.
48	E Dist Subst Repl Other Equip	48L	Dist Line Work Support Substat	MAT 48L includes emergency replacements; PG&E prioritizes identified failures of equipment over proactive replacement of equipment.

54	E Dist Subst Repl Transformer	54A	E Dist Subst-Repl Transfm	PG&E prioritizes proactive replacement of power transformers with higher reliability risk impacting customers over proactive replacement of other equipment with lower reliability risk.
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- c. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(b)”
- d. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(c)”
- e. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)”



**PACIFIC GAS AND ELECTRIC COMPANY**  
**Risk Spending Accountability Report Discovery 2023**  
**Data Response**

PG&E Data Request No.:	CalAdvocates 001-Q008		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 001-Q008		
Request Date:	June 25, 2024	Requester DR No.:	001
Date Sent:	July 10, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

**QUESTION 008**

In line 136 of Table 3-4 of PG&E’s 2023 RSAR, PG&E states that it did not complete 31 distribution substation circuit breaker replacements (MAT 48D) for the year 2023 compared to what was authorized (valued at \$20.6 million). PG&E states regarding this program that

“Program expenditures were below imputed regulatory values due to prioritizing work in Emergency Replacements (MWC 17 and 59), and Overhead Maintenance Replacements (MWC 2A).”

PG&E further states that

“For 2023, PG&E reprioritized funding from MAT 48D to higher priority work in other programs as described in the cost variance explanation. At this time, PG&E anticipates that this program will continue to be lower priority for the remainder of the GRC cycle. Breakers may be replaced under MWC 59.”<sup>25</sup>

PG&E requested \$28.6 million in its 2023 GRC testimony<sup>26</sup> and was authorized to spend \$28.6 million on this program in D.23-11-069.<sup>27</sup>

- a. Please state the basis for this program being lower priority for the remainder of the GRC cycle.
- b. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity

- c. Why did PG&E request \$28.6 million for this program in its 2023 GRC testimony when PG&E anticipates that this program will continue to be lower priority for the remainder of the GRC cycle?

<sup>25</sup> PG&E’s 2023 RSAR at 3-16.

<sup>26</sup> A.21-06-021, Exh. PG&E-4 at 15-24.

<sup>27</sup> D.23-110-069 at 406.

- d. When did PG&E become aware that this program would be lower priority in this GRC cycle?
- e. Please provide a plan and timeline for completion for the abovementioned 31 distribution substation circuit breaker replacements not performed for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step Towards Completion of Incomplete Work	How PG&E will Execute This Step	Beginning Date of Step	End Date of Step
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**ANSWER 008**

- a. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)” which provides an Electric Distribution portfolio level explanation of how priorities changed since the GRC was forecasted.

PG&E anticipates that MAT 48D will be a lower priority than other work because, for example, emergency replacements of equipment that has already failed under MWCs 59 and 17 is higher priority than proactive replacements. PG&E is also prioritizing the reduction of the open tag backlog in MAT 2AA, which has emerged as a wildfire mitigation.

- b. As stated in PG&E’s 2023 RSAR, in 2023, PG&E allocated resources to higher priority work in Emergency Replacements (MWC 17 and 59), and Overhead Maintenance Replacements (MWC 2A). Please also see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a).”

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
59	E Dist Subst Emergency Repl	N/A	N/A	PG&E prioritizes identified failures of equipment over proactive replacement of equipment.
17	Electric Distribution Routine Emergency	N/A	N/A	PG&E prioritizes identified failures of equipment over the proactive replacement of equipment
2A	E Dist Inst/Repl OH General	2AA	OH Genl Repl	PG&E prioritizes funding of ignition-risk tags that are part of WMP compliance.

- c. Please see PG&E's response to "RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(b)"
- d. Please see PG&E's response to "RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(c)"
- e. Please see PG&E's response to "RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)"

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 001-Q009		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates_001-Q009		
Request Date:	June 25, 2024	Requester DR No.:	001
Date Sent:	July 10, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

**QUESTION 009**

In line 140 of Table 3-4 of PG&E’s 2023 RSAR, PG&E states that it underspent by \$2.5 million for the distribution substation switch replacement program (MAT code 48E). PG&E does not report work units for the program, stating that

“This program has no measurable units because there is no standard unit of measure.”

PG&E states regarding the program that

“For the 2023 GRC cycle, PG&E anticipates that this work will continue to be lower priority than other Substation work. Switches may be replaced under MWC 59.”<sup>28</sup>

PG&E requested \$2.2 million in its 2023 GRC testimony<sup>29</sup> and was authorized to spend \$2.2 million on this program in D.23-11-069.<sup>30</sup>

- a. Please state the basis for this program being lower priority than other substation work.
- b. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity

- c. Why did PG&E request \$2.2 million for this program in its 2023 GRC testimony when PG&E anticipates that this program will be lower priority than other substation work?
- d. When did PG&E become aware that this program would be lower priority than other substation work?

<sup>28</sup> PG&E’s 2023 RSAR at 3-16.

<sup>29</sup> A.21-06-021, Exh. PG&E-4 at 15-27.

<sup>30</sup> D.23-110-069 at 408.

- e. Please provide a plan and timeline for completion of the work noted as reprioritized for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step Towards Completion of Incomplete Work	How PG&E will Execute This Step	Beginning Date of Step	End Date of Step
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**ANSWER 009**

- a. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)” which provides an Electric Distribution portfolio level view of how priorities changed since we submitted our GRC forecast. Like prioritization across the Electric Distribution portfolio (across MWCs), ongoing reprioritization also occurs within sub-programs (MAT codes) under the same MWC, or in this case under the same business unit (like MWCs under the greater Substation program).

PG&E anticipates that MAT 48E will be a lower priority than other Substation work because, for example, Substation Emergency replacements under MWC 59 is likely to continue to have higher volumes; the replacement of equipment that has already failed is higher priority than proactive replacements. To the extent that the pattern of higher emergency replacements continues, those will take precedence over proactive replacements like in MAT 48E.

- b. As PG&E stated in its 2023 RSAR, in 2023, PG&E prioritized Substation work (for example in MWC 59) over MAT 48E. Please also see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a).”

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
59	E Dist Subst Emergency Repl	N/A	N/A	PG&E prioritizes identified failures of equipment over proactive replacement of equipment

- c. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(b)”
- d. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(c)”
- e. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)”

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Risk Spending Accountability Report Discovery 2023**  
**Data Response**

PG&E Data Request No.:	CalAdvocates_001-Q010		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates_001-Q010		
Request Date:	June 25, 2024	Requester DR No.:	001
Date Sent:	July 10, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

**QUESTION 010**

In line 143 of Table 3-4 of PG&E’s 2023 RSAR, PG&E states that it underspent by \$16.3 million for the distribution substation switchgear replacement program (MAT Code 48F). PG&E does not report work units for the program, stating that

“This program has no measurable units because there is no standard unit of measure.”

PG&E states regarding the program that

“For 2023, PG&E reprioritized this work to higher priority emergency work in MWC 59. At this time, PG&E foresees this program will continue to be lower priority.”<sup>31</sup>

PG&E requested \$32.4 million in its 2023 GRC testimony<sup>32</sup> and was authorized to spend \$32.4 million on this program in D.23-11-069.<sup>33</sup>

- a. Please state the basis for this program being lower priority and continuing to be lower priority as mentioned above.
- b. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity

- c. Why did PG&E request \$32.4 million for this program in its 2023 GRC testimony when PG&E foresees this program will continue to be lower priority?
- d. When did PG&E become aware that this program would be lower priority?

<sup>31</sup> PG&E’s 2023 RSAR at 3-16.

<sup>32</sup> A.21-06-021, Exh. PG&E-4 at 15-24.

<sup>33</sup> D.23-110-069 at 414.

- e. Please provide a plan and timeline for completion of the work noted as reprioritized for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step Towards Completion of Incomplete Work	How PG&E will Execute This Step	Beginning Date of Step	End Date of Step
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**ANSWER 010**

- a. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)” which provides an Electric Distribution portfolio level view of how priorities changed since we submitted our GRC forecast. Like prioritization across the Electric Distribution portfolio (across MWCs), ongoing reprioritization also occurs within sub-programs (MAT codes) under the same MWC, or in this case under the same business unit (like MWCs under the greater Substation program).

PG&E anticipates that MAT 48F will be a lower priority than other substation work because, for example, substation emergency replacements under MWC 59 is likely to continue to have higher volumes; the replacement of equipment that has already failed is higher priority than proactive replacements. To the extent that the pattern of higher emergency replacements continues, those will take precedence over proactive replacements like in MAT 48F.

- b. As PG&E stated in its 2023 RSAR, in 2023, PG&E prioritized substation work in MWC 59 over MAT 48F. Please also see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a).”

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
59	E Dist Subst Emergency Repl	N/A	N/A	PG&E prioritizes identified failures of equipment over proactive replacement of equipment

- c. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(b)”
- d. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(c)”
- e. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)”

**PACIFIC GAS AND ELECTRIC COMPANY  
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Data Response**

PG&E Data Request No.:	CalAdvocates 002-Q001		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 002-Q001		
Request Date:	June 28, 2024	Requester DR No.:	002
Date Sent:	July 15, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 001**

In line 146 of Table 3-4 of PG&E's 2023 RSAR, PG&E states that it underspent by \$4.8 million for the distribution substation civil structures replacement program (MAT Code 48H). PG&E does not report work units for the program, stating that "This program has no measurable units because there is no standard unit of measure." PG&E states regarding the program that "For 2023, PG&E reprioritized this work to higher priority emergency work in MWC 59. At this time, PG&E foresees this program will continue to be lower priority."<sup>2</sup>

PG&E requested \$5.4 million in its 2023 GRC testimony<sup>3</sup> and was authorized to spend \$5.4 million on this program in D.23-11-069.<sup>4</sup>

- a. Please state the basis for this program being lower priority as stated above.
- b. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity

- c. Why did PG&E request \$5.4 million for this program in its 2023 GRC testimony when PG&E foresees this program will continue to be lower priority?
- d. When did PG&E become aware that this program would be lower priority?
- e. Please provide a plan and timeline for completion of the work noted as reprioritized for the year 2023 in the below table (adding rows as needed). Include how PG&E

<sup>1</sup> Pacific Gas and Electric Company, *2023 Risk Spending Accountability Report in Compliance with California Public Utilities Commission Decision 19-04-020 and Decision 22-10-002* submitted May 31, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 3-16

<sup>3</sup> A.21-06-021, Exh. PG&E-4 at 15-27.

<sup>4</sup> D.23-11-069 at 415.



will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 001**

- a. Please see PG&E’s response to CalAdvocates Data Request Set #1, Question 001 (a.) which provides an Electric Distribution portfolio level view of how priorities changed since we submitted our GRC forecast. Like prioritization across the Electric Distribution portfolio (across MWCs), ongoing reprioritization also occurs within sub-programs (MAT codes) under the same MWC, or in this case under the same business unit (like MWCs under the greater Substation program).

PG&E anticipates that MAT 48H will be a lower priority than other Substation work such as Substation Emergency replacements under MWC 59 because the replacement of equipment that has already failed is higher priority than proactive replacements. To the extent that the pattern of higher emergency replacements continues, those will take precedence over pro-active replacements like in MAT 48H.

- b. As PG&E stated in the RSAR, in 2023, PG&E prioritized substation work in MWC 59 over MAT 48H. Please also see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a).”

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
59	E Dist Subst Emergency Repl	N/A	N/A	PG&E prioritizes identified failures of equipment over proactive replacement of equipment

- c. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(b).”
- d. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(c).”
- e. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e).”

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 002-Q002		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 002-Q002		
Request Date:	June 28, 2024	Requester DR No.:	002
Date Sent:	July 15, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 002**

In line 163 of Table 3-4 of PG&E's 2023 RSAR, PG&E states that it completed 54 fewer overhead fuse replacements (MAT Code 49C) than were authorized for the year 2023. However, PG&E overspent on the program by \$551,000 compared to what was authorized. PG&E states "Actual program units were below imputed program units due to higher unit costs than forecasted in the GRC. PG&E attributes the higher costs to general inflation." PG&E states that "For the remainder of the GRC cycle, PG&E expects to complete fewer units for the costs allocated." <sup>2</sup>

PG&E requested \$1.56 million for his program in its 2023 GRC testimony<sup>3</sup> and was authorized to spend \$1.56 million on this program in D.23-11-069.<sup>4</sup>

- a. Please list and describe all drivers of the abovementioned increased unit costs.
- b. Please provide a plan and timeline for completion for the abovementioned 56 incomplete units of work for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

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<sup>1</sup> Pacific Gas and Electric Company, *2023 Risk Spending Accountability Report in Compliance with California Public Utilities Commission Decision 19-04-020 and Decision 22-10-002* submitted May 31, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 3-17.

<sup>3</sup> A.21-06-021, Exh. PG&E-4 at 13-48.

<sup>4</sup> D.23-11-068 at 388.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 002**

- a. In addition to inflation, PG&E conducted additional work not directly associated with the fuse itself to this MAT code when the fuse installation was for the purpose of expedited risk mitigation. For example, if when scoping a fuse installation, the span of conductor from that pole is assessed to be at risk, PG&E will re-conductor that span as part of the installation. This raises the unit cost for the fuse installation under MAT 49C, but also introduces an efficiency because the crew is only coming out once to address both issues; the overhead conductor replacement work is in alignment with the company's focus to minimize fire ignition risks associated with equipment failure (resulting in a wire down event) while also adding the new fuse for reliability purposes.
- b. Please see PG&E's response to "RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)."

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Risk Spending Accountability Report Discovery 2023**  
**Data Response**

PG&E Data Request No.:	CalAdvocates 002-Q003		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates_002-Q003		
Request Date:	June 28, 2024	Requester DR No.:	002
Date Sent:	July 15, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 003**

On line 181 of Table 3-4 of PG&E's 2023 RSAR, PG&E states that it underspent on Grid Modernization Technology (MAT Code 49R) by \$18.2 million in the year 2023 compared to what was authorized. PG&E does not report work units for the program, stating that "This program has no measurable units because there is no standard unit of measure." PG&E states "program expenditures were below imputed regulatory values due to delays in the Rapid Earth Fault Current Limiter (REFCL) demonstration project." PG&E further states "The purpose of this program is the evaluation of the effectiveness of the REFCL technology to mitigate the need for PSPS. PG&E has not made a decision on the scope of REFCL installation in the GRC cycle."<sup>2</sup>

PG&E requested \$17.3 million in its 2023 GRC testimony<sup>3</sup> and was authorized to spend \$17.3 million on this program in D.23-11-069.<sup>4</sup>

- a. Why has PG&E not made a decision on the scope of REFCL installation in the GRC cycle?
- b. When does PG&E anticipate making a decision regarding the scope of REFCL installation in the GRC cycle?
- c. Please list and explain all criteria PG&E will employ when making a decision regarding the scope of REFCL installation in the GRC cycle.
- d. How will PG&E utilize the funds authorized for MAT Code 49R if they are not spent on REFCL installations?
- e. Why did PG&E request \$17.3 million for this program in its GRC testimony when PG&E has not made a decision on the scope of REFCL installation in the GRC cycle?

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<sup>1</sup> Pacific Gas and Electric Company, *2023 Risk Spending Accountability Report in Compliance with California Public Utilities Commission Decision 19-04-020 and Decision 22-10-002* submitted May 31, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 3-18.

<sup>3</sup> A.21-06-021, Exh. PG&E-4 at 4.3-64

<sup>4</sup> D.23-11-069 at 387.

- f. Please provide a plan and timeline for completion of the work noted as incomplete under MAT Code 49R (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 003**

- a. PG&E has not made a decision on the scope of REFCL installation in the GRC cycle because it has not completed evaluation of the technology in the demonstration project due to setbacks from equipment failures and high neutral voltage as also communicated in WMP update.<sup>5</sup>
- b. PG&E anticipates making a decision regarding the scope of REFCL installation in the GRC cycle beginning 2025.
- c. PG&E uses a wildfire risk model for its service territory. As stated in the 2023 GRC testimony:

*Based on our initial testing and the successful implementation in Australia, PG&E has developed a short-term strategy to install REFCLs in HFTD areas. PG&E forecasts deploying REFCLs at an additional two substations each year, but these plans could change pending pilot results and integration with other enhanced automation and wildfire mitigation efforts described in this chapter. In coordination with deployments of other technologies, future REFCL deployments will utilize PG&E’s 2021 Wildfire Distribution Risk Model in combination with feasibility screens to help prioritize highest-risk locations for installations.*<sup>6</sup>

The scope of REFCL installation in the GRC cycle will be determined from overall risk reduction from all applicable mitigations for a given distribution substation and the connected circuits.

- d. Capital funds authorized for REFCL are in the Wildfire Mitigation Balancing Account. Funding not used for REFCL will be used for other wildfire mitigations if needed or returned to customers at the end of the 2023 GRC cycle.
- e. PG&E had anticipated to complete the evaluation of the REFCL demonstration project to inform scope of REFCL installation in the GRC cycle. Please see response to 3c above.
- f. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e).”

<sup>5</sup> PG&E’s 2023-2025 Wildfire Mitigation Plan R6 (July 5, 2024), p. 284-285.

<sup>6</sup> PG&E’s 2023 GRC (A.21-06-021) Exhibit (PGE-04), chapter 4.3, p.64.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Risk Spending Accountability Report Discovery 2023**  
**Data Response**

PG&E Data Request No.:	CalAdvocates_002-Q004		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates_002-Q004		
Request Date:	June 28, 2024	Requester DR No.:	002
Date Sent:	July 15, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 004**

In line 184 of Table 3-4 of PG&E's 2023 RSAR, PG&E states that it did not complete 11 Fault Location, Isolation, Restoration, and Repair (FLISR) circuit activations (MAR Code 49S) compared to what was authorized for the year 2023 (valued at \$2.9 million). PG&E states that this was due to "reprioritization to other higher priority programs like Emergency Replacements (MWC 17 and 59), and Overhead Maintenance Replacements (MWC 2A)." PG&E states regarding this program that "Program expenditures were below imputed regulatory values due to prioritizing work in Emergency Replacements (MWC 17 and 59), and Overhead Maintenance Replacements (MWC 2A)." PG&E anticipates that this program will continue to be lower priority for the remainder of the GRC cycle."<sup>2</sup>

PG&E requested \$3.7 million for the year in its 2023 GRC testimony<sup>3</sup> and was authorized to spend \$3.7 million on this program in D.23-11-069.<sup>4</sup>

- a. Please state the basis for this program continuing to be lower priority for the remainder of the GRC cycle.
- b. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

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<sup>1</sup> Pacific Gas and Electric Company, *2023 Risk Spending Accountability Report in Compliance with California Public Utilities Commission Decision 19-04-020 and Decision 22-10-002* submitted May 31, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 3-18

<sup>3</sup> A.21-06-021, Exh. PG&E-4 at 13-49.

<sup>4</sup> D.23-110-069 at 387.

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity
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- c. Why did PG&E request \$3.7 million for this program in its 2023 GRC testimony when PG&E anticipates this program will be lower priority in this GRC cycle?
- d. When did PG&E become aware that this would be a lower priority program in this GRC cycle?
- e. Please provide a plan and timeline for completion for the abovementioned 11 incomplete units of work for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 004**

- a. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)” which provides an Electric Distribution portfolio level explanation of how priorities changed since the GRC was forecasted. As explained in PG&E’s 2023 RSAR, program expenditures in MAT 49S were below imputed regulatory values due to prioritizing work in Emergency Replacements (MWC 17 and 59), and Overhead Maintenance Replacements (MWC 2A).” PG&E anticipates that this program will continue to be lower priority for the remainder of the GRC cycle because of the company’s continued prioritize wildfire risk mitigation and is obligated to promptly respond to emergency events as they emerge. MAT 49S is a reliability improvement program, is not associated with risk mitigation, and is lower priority than replacing equipment that has already failed.
- b. As stated in the RSAR, PG&E allocated resources from MAT 49S to higher priority work in MWC 17, 59, and 2A.

Please also see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a).”

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
59	E Dist Subst Emergency Repl	N/A	N/A	PG&E prioritizes identified failures of equipment over proactive replacement of equipment.

17	Electric Distribution Routine Emergency	N/A	N/A	PG&E prioritizes identified failures of equipment over the proactive replacement of equipment
2A	E Dist Inst/Repl OH General	2AA	OH Genl Repl	PG&E prioritizes funding of ignition-risk tags that are part of WMP compliance.

- c. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(b).”
- d. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(c).”
- e. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e).”



**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 002-Q005		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 002-Q005		
Request Date:	June 28, 2024	Requester DR No.:	002
Date Sent:	July 15, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 005**

On line 199 of Table 3-4 of PG&E's 2023 RSAR, PG&E states that it underspent on electric distribution substation transformer life extension (MAT Code 54L) by \$3.4 million for the year 2023. PG&E does not report work units for the program, stating that "This program has no measurable units because there is no standard unit of measure." PG&E states "For 2023 PG&E prioritized funding from MAT 54L to higher priority work in MAT 54A. Over the GRC cycle, PG&E expects to continue to reprioritize this program to higher priority work within the MWC 54 program."<sup>2</sup>

PG&E requested \$3.25 million in its 2023 GRC testimony<sup>15</sup><sup>3</sup> and was authorized to spend \$37 million on this program in D.23-11-06916<sup>4</sup>

- a. Please state the basis for reprioritizing this program to other work within the MWC 54 program.
- b. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity

- c. Why did PG&E request \$3.25 million in its GRC testimony even as resources were nearly completed diverted from this program?
- d. Please provide a plan and timeline for completion of the work noted as reprioritized for the year 2023 in the below table (adding rows as needed). Include how PG&E

<sup>1</sup> Pacific Gas and Electric Company, *2023 Risk Spending Accountability Report in Compliance with California Public Utilities Commission Decision 19-04-020 and Decision 22-10-002* submitted May 31, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 3-18.

<sup>3</sup> A.21-06-021, Exh. PG&E-4 at 15-33.

<sup>4</sup> D.23-110-069 at 417.

will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 005**

- a. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)” which provides an Electric Distribution portfolio level view of how priorities changed since we submitted our GRC forecast. Like prioritization across the Electric Distribution portfolio (across MWCs), ongoing reprioritization also occurs within sub-programs (MAT codes) under the same MWC, or in this case under the same business unit (like MWCs under the greater Substation program). The programs under MAT 54A and MWC 59 are all substation programs and higher priority than the program under MAT 54L.

PG&E anticipates that MAT 54L will be a lower priority than other Substation work such as Substation Emergency replacements under MWC 59 because the replacement of equipment that has already failed is higher priority than proactive replacements. To the extent that the higher-than-forecasted emergency replacements continues, those will take precedence over pro-active transformer life extensions like in MAT 54L.

- b. As PG&E stated in the RSAR, in 2023, PG&E prioritized substation work in MAT 54A and MWC 59 over MAT 54L. Please also see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a).”

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
54	E Dist Subst Repl Transformer	54A	E Dist Subst-Repl Transfm	PG&E prioritizes active power transformer replacement work that is in progress over transformer life extension work that has not started
59	E Dist Subst Emergency Repl	N/A	N/A	PG&E prioritizes identified failures of equipment over proactive replacement of equipment

- c. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(b).”
- d. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e).”

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 002-Q006		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 002-Q006		
Request Date:	June 28, 2024	Requester DR No.:	002
Date Sent:	July 22, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company’s (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 006**

On line 202 of Table 3-4 of PG&E’s 2023 RSAR, PG&E states that it did not complete 11 circuit-miles of underground cable replacement (MAT Code 56A) for the year 2023 (valued at \$18.1 million). PG&E states that this was due to “due to reprioritizing to emergency replacements (MWC 17), underground/network maintenance replacements (MWCs 2B & 2C), and capacity improvements (MWC 06).” PG&E further states that “PG&E anticipates that this program will continue to be lower priority for the remainder of the GRC cycle.”<sup>2</sup>

PG&E requested \$37 million in its 2023 GRC testimony<sup>18</sup><sup>3</sup> and was authorized to spend \$37 million on this program in D.23-11-069.<sup>19</sup><sup>4</sup>

- a. Please state the basis for this program being lower priority in this GRC cycle.
- b. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity

- c. Why did PG&E request \$37 million for this program in its 2023 GRC testimony when PG&E anticipates this program will be lower priority in this GRC cycle?
- d. When did PG&E become aware that this would be a lower priority program in this GRC cycle?

<sup>1</sup> Pacific Gas and Electric Company, *2023 Risk Spending Accountability Report in Compliance with California Public Utilities Commission Decision 19-04-020 and Decision 22-10-002* submitted May 31, 2024 (referred to as “PG&E’s 2023 RSAR”)

<sup>2</sup> PG&E’s 2023 RSAR at 3-18.

<sup>3</sup> A.21-06-021, Exh. PG&E-4 at 13-36.

<sup>4</sup> D.23-110-069 at 390.

- e. Please provide a plan and timeline for completion for the abovementioned 11 incomplete units of work for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 006**

- a. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)” which provides an Electric Distribution portfolio level explanation of how priorities changed since the GRC was forecasted. Work in MAT 56A is proactive replacement of underground cable assets. Given the change, 56A is lower priority than emergency replacement of equipment that has already failed (MWC 17), certain high priority underground replacement notifications (MWC 2B), replacement of network transformers in MWC 2C, and PG&E’s obligation to increase capacity to meet customer demand (MWC 06).
- b. As stated in the RSAR, “Program expenditures were below imputed regulatory values due to reprioritizing to emergency replacements (MWC 17), underground/network maintenance replacements (MWCs 2B & 2C), and capacity improvements (MWC 06).” Please also see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)”.

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
06	E Dist. Line Capacity	Various	Various	Customer requests for service exceeded the GRC forecast for New Business and Distribution Capacity.
17	Electric Distribution Routine Emergency	N/A	N/A	PG&E prioritizes identified failures of equipment over the proactive replacement of equipment.
2C	E Dist Inst/Repl Network	Various	Various	PG&E prioritized the replacement of network transformers over the replacement of underground

				assets in MWC 56.
2B	E Dist Inst/Repl UG	2BA	UG Genl Repl	PG&E prioritized the larger than forecast volumes of high priority underground general equipment replacement notifications over the proactive replacement of equipment.

- c. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(b)”.
- d. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(c)”.
- e. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)”.

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Data Response**

PG&E Data Request No.:	CalAdvocates 002-Q007		
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Request Date:	June 28, 2024	Requester DR No.:	002
Date Sent:	July 22, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 007**

On line 204 of Table 3-4 of PG&E's 2023 RSAR, PG&E states that it did not complete 6 circuitmiles of underground cable testing and rejuvenation (MAT Code 56B) compared to what was authorized for the year 2023 (valued at \$1.1 million). PG&E states that this was due to "due to reprioritizing to emergency replacements (MWC 17), underground/network maintenance replacements (MWCs 2B & 2C), and capacity improvements (MWC 06)." PG&E further states that "PG&E anticipates that this program will continue to be lower priority for the remainder of the GRC cycle."<sup>2</sup>

PG&E requested \$1.1 million in its 2023 GRC testimony<sup>3</sup> and was authorized to spend \$1.1 million on this program in D.23-11-069.<sup>4</sup>

- a. Please state the basis for this program being lower priority in this GRC cycle.
- b. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity

- c. Why did PG&E request \$1.1 million for this program in its 2023 GRC testimony when PG&E anticipates this will be a lower priority program in this GRC cycle?
- d. When did PG&E become aware that this would be a lower priority program?

<sup>1</sup> Pacific Gas and Electric Company, *2023 Risk Spending Accountability Report in Compliance with California Public Utilities Commission Decision 19-04-020 and Decision 22-10-002* submitted May 31, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 3-18.

<sup>3</sup> A.21-06-021, Exh. PG&E-4 at 13-37.

<sup>4</sup> D.23-11-069 at 389.

- e. Please provide a plan and timeline for completion for the abovementioned 56 incomplete units of work for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 007**

- a. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)” which provides an Electric Distribution portfolio level explanation of how priorities changed since the GRC was forecasted. Work in MAT 56B is proactive testing and rejuvenation of underground cable assets. Given the change, 56B is lower priority than emergency replacement of equipment that has already failed (MWC 17), certain high priority underground replacement notifications (MWC 2B), replacement of network transformers in MWC 2C, and PG&E’s obligation to increase capacity to meet customer demand (MWC 06).
- b. As stated in the RSAR, “*Actual program units were below imputed program units due to reprioritizing emergency replacements (MWC 17), underground/network maintenance replacements (MWCs 2B & 2C), and capacity improvements (MWC 06).*” Please also see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)”.

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
06	E Dist. Line Capacity	Various	Various	Customer requests for service exceeded the GRC forecast for New Business and Distribution Capacity.
17	Electric Distribution Routine Emergency	N/A	N/A	PG&E prioritizes identified failures of equipment over the proactive replacement of equipment.
2C	E Dist Inst/Repl Network	Various	Various	PG&E prioritized the replacement of network transformers over the replacement of underground

				assets in MWC 56.
2B	E Dist Inst/Repl UG	2BA	UG Genl Repl	PG&E prioritized the larger than forecast volumes of high priority underground general equipment replacement notifications over the proactive replacement of equipment.

- c. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(b)”
- d. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(c)”
- e. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)”



**PACIFIC GAS AND ELECTRIC COMPANY  
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Data Response**

PG&E Data Request No.:	CalAdvocates 002-Q008		
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Request Date:	June 28, 2024	Requester DR No.:	002
Date Sent:	July 22, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 008**

On line 206 of Table 3-4 of PG&E's 2023 RSAR, PG&E states that it did not complete 23 underground cable Critical Operating Equipment (COE) replacement projects (MAT Code 56C) compared to what was authorized for the year 2023 (valued at \$29.6 million). PG&E states that this was due to "due to reprioritizing to emergency replacements (MWC 17), underground/network maintenance replacements (MWCs 2B & 2C), and capacity improvements (MWC 06)." PG&E further states that "PG&E anticipates that this program will continue to be lower priority for the remainder of the GRC cycle."<sup>2</sup>

PG&E requested \$36 million in its 2023 GRC testimony<sup>3</sup> and was authorized to spend \$36 million on this program in D.23-11-069.<sup>4</sup>

- a. Please state the basis for this program being lower priority in this GRC cycle.
- b. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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- c. Why did PG&E request \$36 million in its 2023 GRC testimony when PG&E anticipates this will be a lower priority program in this GRC cycle?
- d. When did PG&E become aware that this would be a lower priority program in this GRC cycle?

<sup>1</sup> Pacific Gas and Electric Company, *2023 Risk Spending Accountability Report in Compliance with California Public Utilities Commission Decision 19-04-020 and Decision 22-10-002* submitted May 31, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 3-18.

<sup>3</sup> A.21-06-021, Exh, PG&E-4 at 13-38.

<sup>4</sup> D.23-11-069 at 392.

- e. Please provide a plan and timeline for completion for the abovementioned 56 incomplete units of work for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 008**

- a. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)” which provides an Electric Distribution portfolio level explanation of how priorities changed since the GRC was forecasted. Work in MAT 56C is underground cable assets COE replacement. Given the change, 56C is lower priority than emergency replacement of equipment that has already failed (MWC 17), certain high priority underground replacement notifications (MWC 2B), replacement of network transformers in MWC 2C, and PG&E’s obligation to increase capacity to meet customer demand (MWC 06).
- b. As stated in the RSAR, “Program expenditures were below imputed regulatory values due to reprioritizing emergency replacements (MWC 17), underground/network maintenance replacements (MWCs 2B & 2C), and capacity improvements (MWC 06).” Please also see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)”.

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
06	E Dist. Line Capacity	Various	Various	Customer requests for service exceeded the GRC forecast for New Business and Distribution Capacity.
17	Electric Distribution Routine Emergency	N/A	N/A	PG&E prioritizes identified failures of equipment over the proactive replacement of equipment.
2C	E Dist Inst/Repl Network	Various	Various	PG&E prioritized the replacement of network transformers over the replacement of underground

				assets in MWC 56.
2B	E Dist Inst/Repl UG	2BA	UG Genl Repl	PG&E prioritized the larger than forecast volumes of high priority underground general equipment replacement notifications over the proactive replacement of equipment.

- c. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(b)”.
- d. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(c)”.
- e. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)”.

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Data Response**

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Request Date:	June 28, 2024	Requester DR No.:	002
Date Sent:	July 16, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 009**

On line 209 of Table 3-4 of PG&E's 2023 RSAR, PG&E states that it did not complete 56,889 circuit feet of underground network cable replacement (MAT Code 56N) compared to what was authorized for the year 2023 (valued at \$39.1 million). PG&E states that this was due to "due to reprioritizing to emergency replacements (MWC 17), underground/network maintenance replacements (MWCs 2B & 2C), and capacity improvements (MWC 06)." PG&E further states that "PG&E anticipates that this program will continue to be lower priority for the remainder of the GRC cycle."<sup>2</sup>

PG&E requested \$30.9 million in its 2023 GRC testimony<sup>3</sup> and was authorized to spend \$30.9 million on this program in D.23-11-069<sup>4</sup>

- a. Please state the basis for this program being lower priority in this GRC cycle.
- b. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity

- c. Why did PG&E request \$30.9 million for this program in its 2023 GRC testimony when PG&E anticipates this will be a lower priority program in this GRC cycle?
- d. When did PG&E become aware that this will be a lower priority program?
- e. Please provide a plan and timeline for completion for the abovementioned 56,889 incomplete units of work for the year 2023 in the below table (adding rows as

<sup>1</sup> Pacific Gas and Electric Company, *2023 Risk Spending Accountability Report in Compliance with California Public Utilities Commission Decision 19-04-020 and Decision 22-10-002* submitted May 31, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 3-18.

<sup>3</sup> A.21-06-021, Exh. PG&E-4 at 14-21.

<sup>4</sup> D.23-11-069 at 389.

needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 009**

- a. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)” which provides an Electric Distribution portfolio level explanation of how priorities changed since the GRC was forecasted. Work in MAT 56N is proactive replacement of network cable assets. In the 2020 RAMP, 56N was a mitigation (DNTWK-004) but was changed in the 2024 RAMP to a control (DUNGD-C011).<sup>5</sup> Given the change, 56N is lower priority than emergency replacement of equipment that has already failed (MWC 17), certain high priority underground replacement notifications (MWC 2B), replacement of network transformers in MWC 2C which have a higher risk (per the 2024 RAMP), and PG&E’s obligation to increase capacity to meet customer demand (MWC 06).
- b. As stated in the RSAR, “Program expenditures were below imputed regulatory values due to reprioritizing emergency replacements (MWC 17), underground/network maintenance replacements (MWCs 2B & 2C), and capacity improvements (MWC 06).” Please also see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)”

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
06	E Dist. Line Capacity	Various	Various	Customer requests for service exceeded the GRC forecast for New Business and Distribution Capacity.
17	Electric Distribution Routine Emergency	N/A	N/A	PG&E prioritizes identified failures of equipment over the proactive replacement of equipment.
2C	E Dist Inst/Repl Network	Various	Various	PG&E prioritizes the replacement of network transformers over the replacement

<sup>5</sup> PG&E’s 2024 RSAR (A.24-05-008), (PG&E-04) Ch. 5 Workpaper - EO-DUNGD-F

				of network cable assets.
2B	E Dist Inst/Repl UG	2BA	UG Genl Repl	PG&E prioritized the larger than forecast volumes of high priority underground general equipment replacement notifications over the proactive replacement of equipment.

- c. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(b)”
- d. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(c)”
- e. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)”

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 002-Q010		
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Request Date:	June 28, 2024	Requester DR No.:	002
Date Sent:	July 22, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 010**

On line 212 of Table 3-4 of PG&E's 2023 RSAR, PG&E states that it did not complete 77 underground switch replacements (MAT Code 56S) compared to what was authorized for the year 2023 (valued at \$9.3 million). PG&E states that this was due to "due to reprioritizing to emergency replacements (MWC 17), underground/network maintenance replacements (MWCs 2B & 2C), and capacity improvements (MWC 06)." PG&E further states that "PG&E anticipates that this program will continue to be lower priority for the remainder of the GRC cycle."<sup>2</sup>

PG&E requested \$8.1 million in its 2023 GRC testimony<sup>3</sup> and was authorized to spend \$8.1 million on this program in D.23-11-069.<sup>4</sup>

- a. Please state the basis for this program being lower priority in this GRC cycle.
- b. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity

- c. Why did PG&E request \$8.1 million for this program in its 2023 GRC testimony when PG&E anticipates that this will be a lower priority program in this GRC cycle?
- d. When did PG&E become aware that this would be a lower priority program?

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<sup>1</sup> Pacific Gas and Electric Company, *2023 Risk Spending Accountability Report in Compliance with California Public Utilities Commission Decision 19-04-020 and Decision 22-10-002* submitted May 31, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> A.21-06-021, Exh. PG&E-4 at 13-19.

<sup>3</sup> A.21-06-021, Exh. PG&E-4 at 13-41.

<sup>4</sup> D.23-11-069 at 394.

- e. Please provide a plan and timeline for completion for the abovementioned 77 incomplete units of work for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 010**

- a. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)” which provides an Electric Distribution portfolio level explanation of how priorities changed since the GRC was forecasted. Work in MAT 56S is the replacement of obsolete underground switches. Given the change, 56S is lower priority than emergency replacement of equipment that has already failed (MWC 17), certain high priority underground replacement notifications (MWC 2B), replacement of network transformers in MWC 2C, and PG&E’s obligation to increase capacity to meet customer demand (MWC 06).
- b. As stated in the RSAR, “Actual program units were below imputed regulatory values due to reprioritizing emergency replacements (MWC 17), underground maintenance replacements (MWCs 2B & 2C), and capacity improvements (MWC 06).” Please also see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)”.

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
06	E Dist. Line Capacity	Various	Various	Customer requests for service exceeded the GRC forecast for New Business and Distribution Capacity.
17	Electric Distribution Routine Emergency	N/A	N/A	PG&E prioritizes identified failures of equipment over the proactive replacement of equipment.
2C	E Dist Inst/Repl Network	Various	Various	PG&E prioritized the replacement of network transformers over the replacement of underground



				assets in MWC 56.
2B	E Dist Inst/Repl UG	2BA	UG Genl Repl	PG&E prioritized the larger than forecast volumes of high priority underground general equipment replacement notifications over the proactive replacement of equipment.

- c. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(b)”.
- d. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(c)”.
- e. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)”.

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 002-Q011		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 002-Q011		
Request Date:	June 28, 2024	Requester DR No.:	002
Date Sent:	July 22, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 011**

On line 216 of Table 3-4 of PG&E's 2023 RSAR, PG&E states that it did not complete 2,294 underground temperature indicator installations (MAT Code 56T) compared to what was authorized for the year 2023 (valued at \$5.3 million PG&E states that this was "due to reprioritizing to emergency replacements (MWC 17), underground/network maintenance replacements (MWCs 2B & 2C), and capacity improvements (MWC 06)." PG&E further states that "PG&E anticipates that this program will continue to be lower priority for the remainder of the GRC cycle."<sup>2</sup>

PG&E requested \$9.1 million in its 2023 GRC testimony<sup>3</sup> and was authorized to spend \$8.5 million on this program in D.23-11-069.<sup>4</sup>

- a. Please state the basis for this program being lower priority in this GRC cycle.
- b. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity

- c. Why did PG&E request \$9.1 million in its GRC testimony when PG&E anticipates that this will be a lower priority program in this GRC cycle?
- d. When did PG&E become aware this would be a lower priority program?

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<sup>1</sup> Pacific Gas and Electric Company, *2023 Risk Spending Accountability Report in Compliance with California Public Utilities Commission Decision 19-04-020 and Decision 22-10-002* submitted May 31, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 3-19.

<sup>3</sup> A.21-06-021, Exh. PG&E-4 at 13-42.

<sup>4</sup> D.23-11-069 at 395.

- e. Please provide a plan and timeline for completion for the abovementioned 2294 incomplete units of work for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 011**

- a. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)” which provides an Electric Distribution portfolio level explanation of how priorities changed since the GRC was forecasted. Work in MAT 56T is the installation of temperature indicators for underground distribution cable assets. Given the change, 56T is lower priority than emergency replacement of equipment that has already failed (MWC 17), certain high priority underground replacement notifications (MWC 2B), replacement of network transformers in MWC 2C, and PG&E’s obligation to increase capacity to meet customer demand (MWC 06).
- b. As stated in the RSAR, “Actual program units were below imputed program units due to funding being allocated to higher priority work as discussed in the cost variance explanations in MAT 56A.”. The explanation in 56A states, “Program expenditures were below imputed regulatory values due to reprioritizing to emergency replacements (MWC 17), underground/network maintenance replacements (MWCs 2B & 2C), and capacity improvements (MWC 06).” Please also see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(a)”.

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the Reprioritization to This Activity
06	E Dist. Line Capacity	Various	Various	Customer requests for service exceeded the GRC forecast for New Business and Distribution Capacity.
17	Electric Distribution Routine Emergency	N/A	N/A	PG&E prioritizes identified failures of equipment over the proactive replacement of equipment.
2C	E Dist Inst/Repl Network	Various	Various	PG&E prioritized the replacement of network

				transformers over the replacement of underground assets in MWC 56.
2B	E Dist Inst/Repl UG	2BA	UG Genl Repl	PG&E prioritized the larger than forecast volumes of high priority underground general equipment replacement notifications over the proactive replacement of equipment.

- c. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(b)”.
- d. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(c)”.
- e. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)”.

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 003-Q001		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 003-Q001		
Request Date:	June 28, 2024	Requester DR No.:	003
Date Sent:	July 18, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 001**

In line 89 of Table 3-3 of PG&E's 2023 RSAR, PG&E states that it did not complete 142,742 pole inspections (MAT Code GAA) compared in 2023 compared to what was so authorized. In spite of this, PG&E reports that it overspent for the program by \$12.4 million. PG&E states that its overspending was due to an "increase in unit costs on the higher risk circuits performed in 2023" and that this resulted in fewer units being performed. PG&E states that "In 2023 PG&E focused on higher risk circuits which tend to cost more than lower risk circuits. PG&E further states "During the 2023 GRC cycle PG&E expects to continue to perform fewer units due to an increase in unit costs."<sup>2</sup>

PG&E requested \$19.3 million for Mat Code GAA for the year 2023 in its TY 2023 GRC testimony<sup>3</sup> and was authorized to spend \$19.3 million in D.23-11-069.<sup>4</sup>

- a. Please list and describe all drivers of the abovementioned increased unit costs.
- b. How does PG&E intend to overcome these increased unit costs to complete the work authorized?
- c. Please provide a plan and timeline for completion for the abovementioned incomplete 142,742 pole inspections in MAT code GAA in the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

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<sup>1</sup> Pacific Gas and Electric Company, Pacific Gas & Electric Company's (U39M) amendment to the 2023 Risk Spending Accountability Report submitted June 17, 2024 (referred to as "PG&E's 2023 RSAR").

<sup>2</sup> PG&E's 2023 RSAR at 3-6.

<sup>3</sup> A.21-06-021, Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2023., Exh. PG&E-4 at 12-22.

<sup>4</sup> Decision (D.) 23-11-069 Decision on Test Year 2023 General Rate Case of Pacific Gas and Electric Company, November 16, 2023, at 374.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 001**

- a. Increase in unit costs is due to the focus on higher risk circuits, which are typically located in hard to access areas, which require more resources and travel time to safely perform inspections. In addition, PG&E updated its operating procedure, which requires more time per pole, thus increasing the vendor costs. Lastly, inflation above what was forecasted and approved in the GRC contributes to higher unit cost.
- b. As a general matter, PG&E consistently looks for ways to reduce costs and improve efficiencies when conducting authorized work. However, PG&E expects inflationary effects beyond what is captured by the GRC and the updates to its operating procedures to limit the amount of work (units) that can be completed.
- c. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)”

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 003-Q002		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 003-Q002		
Request Date:	June 28, 2024	Requester DR No.:	003
Date Sent:	July 15, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 002**

In line 113 of Table 3-3 of PG&E's 2023 RSAR, PG&E states that it completed 715 fewer circuit breaker preventive maintenance projects (MAT Code GCB) in 2023 compared to what was authorized. In spite of this, PG&E reports that it overspent on the the program by \$128,000. PG&E states that its overspending was due to an "due to higher actual unit costs than forecast. Higher unit costs are generally driven by labor and resulted in fewer program units achieved." PG&E further states "This program's work is ongoing and will continue in PG&E's 2023 GRC period."<sup>2</sup>

- a. Please list and describe all drivers of the abovementioned increased unit costs.
- b. How does PG&E intend to overcome these increased unit costs to complete the work authorized?
- c. Please provide a plan and timeline for completion for the abovementioned incomplete 715 circuit breaker preventive maintenance projects in MAT Code GCB in the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step

**ANSWER 002**

- a. The Unit cost increase was due to a 16% increase in the hourly Labor rate. The Labor rate increase impacts Straight-time, double-time, and over-time. Distribution Control Center (DCC) charges also increased by 12% since the GRC was

<sup>1</sup> Pacific Gas and Electric Company, Pacific Gas & Electric Company's (U39M) amendment to the 2023 Risk Spending Accountability Report submitted June 17, 2024 (referred to as "PG&E's 2023 RSAR").

<sup>2</sup> PG&E's 2023 RSAR at 3-7.

forecasted. Additionally, contract costs were higher than when the GRC was forecasted.

- b. As a general matter, PG&E consistently looks for ways to reduce costs and improve efficiencies when conducting authorized work. However, PG&E expects inflationary effects beyond what is captured by the GRC to limit the amount of work (units) that can be completed.
- c. Please see PG&E's response to "RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)."



**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 003-Q003		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 003-Q003		
Request Date:	June 28, 2024	Requester DR No.:	003
Date Sent:	July 15, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 003**

In line 129 of Table 3-3 of PG&E's 2023 RSAR, PG&E states that it completed 42 fewer distribution switch preventive maintenance projects (MAT Code GCI) in 2023 compared to what was authorized. In spite of this, PG&E reports that it overspent on the program by \$45,900.

PG&E states that its overspending was due to an "due to higher actual unit costs than forecast. Higher unit costs are generally driven by labor and resulted in fewer program units achieved." PG&E further states "This program's work is ongoing and will continue in PG&E's 2023 GRC period."<sup>2</sup>

- a. Please list and describe all drivers of the abovementioned increased unit costs.
- b. How does PG&E intend to overcome these increased unit costs to complete the work authorized?
- c. Please provide a plan and timeline for completion for the abovementioned incomplete 42 distribution switch preventive maintenance projects in MAT code GCI in the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step

**ANSWER 003**

- a. The Unit cost increase was due to a 16% increase in the hourly Labor rate. The Labor rate increase impacts Straight-time, double-time, and over-time. Distribution

<sup>1</sup> Pacific Gas and Electric Company, Pacific Gas & Electric Company's (U39M) amendment to the 2023 Risk Spending Accountability Report submitted June 17, 2024 (referred to as "PG&E's 2023 RSAR").

<sup>2</sup> PG&E's 2023 RSAR at 3-8.

Control Center (DCC) charges also increased by 12% since the GRC was forecasted. Additionally, contract costs were higher than when the GRC was forecasted.

- b. As a general matter, PG&E consistently looks for ways to reduce costs and improve efficiencies when conducting authorized work. However, PG&E expects inflationary effects beyond what is captured by the GRC to limit the amount of work (units) that can be completed.
- c. Please see PG&E's response to "RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)."

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 003-Q004		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 003-Q004		
Request Date:	June 28, 2024	Requester DR No.:	003
Date Sent:	July 15, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 004**

In line 134 of Table 3-3 of PG&E's 2023 RSAR, PG&E states that it completed 91 fewer transformer overhauls (MAT Code GCO) in 2023 compared to what was authorized (valued at \$467,500). PG&E states that this was "due to higher actual unit costs than forecast. Higher unit costs are generally driven by labor and resulted in fewer program units achieved." PG&E further states "This program's work is ongoing and will continue in PG&E's 2023 GRC period."<sup>2</sup>

- a. Please list and describe all drivers of the abovementioned increased unit costs.
- b. How does PG&E intend to overcome these increased unit costs to complete the work authorized?
- c. Please provide a plan and timeline for completion for the abovementioned incomplete 91 transformer overhauls in MAT code GCI in the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step

**ANSWER 004**

- a. The Unit cost increase was due to a 16% increase in the hourly Labor rate. The Labor rate increase impacts Straight-time, double-time, and over-time. Distribution Control Center (DCC) charges also increased by 12% since the GRC was

<sup>1</sup> Pacific Gas and Electric Company, Pacific Gas & Electric Company's (U39M) amendment to the 2023 Risk Spending Accountability Report submitted June 17, 2024 (referred to as "PG&E's 2023 RSAR").

<sup>2</sup> PG&E's 2023 RSAR at 3-8.

forecasted. Additionally, contract costs were higher than when the GRC was forecasted.

- b. As a general matter, PG&E consistently looks for ways to reduce costs and improve efficiencies when conducting authorized work. However, PG&E expects inflationary effects beyond what is captured by the GRC to limit the amount of work (units) that can be completed.
- c. Please see PG&E's response to "RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)."

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 003-Q005		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 003-Q005		
Request Date:	June 28, 2024	Requester DR No.:	003
Date Sent:	July 15, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company’s (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 005**

In line 136 of Table 3-3 of PG&E’s 2023 RSAR, PG&E states that it completed 31 fewer mechanism services (MAT Code GCS) in 2023 compared to what was authorized. However, PG&E overspent on the program by \$410,700. PG&E states that this was “due to higher actual unit costs than forecast. Higher unit costs are generally driven by labor and resulted in fewer program units achieved.” PG&E further states “This program’s work is ongoing and will continue in PG&E’s 2023 GRC period.”

- a. Please list and describe all drivers of the abovementioned increased unit costs.
- b. How does PG&E intend to overcome these increased unit costs to complete the work authorized?
- c. Please provide a plan and timeline for completion for the abovementioned incomplete 31 mechanism services in MAT code GCO in the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step

**ANSWER 005**

- a. The Unit cost increase was due to a 16% increase in the hourly Labor rate. The Labor rate increase impacts Straight-time, double-time, and over-time. Distribution Control Center (DCC) charges also increased by 12% since the GRC was forecasted. Additionally, contract costs were higher than when the GRC was forecasted.

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<sup>1</sup> Pacific Gas and Electric Company, Pacific Gas & Electric Company’s (U39M) amendment to the 2023 Risk Spending Accountability Report submitted June 17, 2024 (referred to as “PG&E’s 2023 RSAR”).

- b. As a general matter, PG&E consistently looks for ways to reduce costs and improve efficiencies when conducting authorized work. However, PG&E expects inflationary effects beyond what is captured by the GRC to limit the amount of work (units) that can be completed.
- c. Please see PG&E's response to "RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)."

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 003-Q006		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 003-Q006		
Request Date:	June 28, 2024	Requester DR No.:	003
Date Sent:	July 22, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 006**

In line 203 of Table 3-3 of PG&E's 2023 RSAR, PG&E states that it completed 1,247 fewer Underground General Corrective Maintenance Notifications (MAT Code KBA) in 2023 compared to what was authorized (valued at \$1.5 million). PG&E states that this was "due to optimizing resources to focus on completing higher priority maintenance tags within MWCs KA and KB". PG&E further states "PG&E will continue to complete notifications based on the workplan maintenance schedule and priority of the tags." PG&E states that the program is "Proceeding as Planned."<sup>2</sup>

PG&E requested \$16 million for Mat Code KBA for the year 2023 in its TY 2023 GRC testimony<sup>3</sup> and was authorized to spend \$16 million in D.23-11-069.<sup>4</sup>

- a. Please state the basis for reprioritizing resources to MWCs KA and KB.
- b. Please list each activity to which resources were reprioritized in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity

- c. Please describe what is meant by the "workplan maintenance schedule and priority of the tags" as mentioned above.

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<sup>1</sup> Pacific Gas and Electric Company, Pacific Gas & Electric Company's (U39M) amendment to the 2023 Risk Spending Accountability Report submitted June 17, 2024 (referred to as "PG&E's 2023 RSAR").

<sup>2</sup> PG&E's 2023 RSAR at 3-10.

<sup>3</sup> A.21-06-021, Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2023., Exhibit (Exh.) PG&E-4 at 13-30.

<sup>4</sup> Decision (D.) 23-11-069 Decision on Test Year 2023 General Rate Case of Pacific Gas and Electric Company, November 16, 2023, at 385.

- d. Please provide the abovementioned “workplan maintenance schedule”.
- e. Please provide information regarding the number of **open** maintenance tags that pertain to this activity in the below table format:

<b>Date</b>	<b>Number of open A tags</b>	<b>Number of open X tags</b>	<b>Number of open B tags</b>	<b>Number of open E tags</b>	<b>Number of open F tags</b>
January 1 <sup>st</sup> , 2020					
January 1 <sup>st</sup> , 2021					
January 1 <sup>st</sup> , 2022					
January 1 <sup>st</sup> , 2023					
January 1 <sup>st</sup> , 2024					

- f. Please provide information regarding the number of **overdue** maintenance tags that pertain to this activity in the below table format:

<b>Date</b>	<b>Number of overdue A tags</b>	<b>Number of overdue X tags</b>	<b>Number of overdue B tags</b>	<b>Number of overdue E tags</b>	<b>Number of overdue F tags</b>
January 1 <sup>st</sup> , 2020					
January 1 <sup>st</sup> , 2021					
January 1 <sup>st</sup> , 2022					
January 1 <sup>st</sup> , 2023					
January 1 <sup>st</sup> , 2024					

- g. When did PG&E become aware that this would be a lower priority program?
- h. Why does PG&E list the program as “Proceeding as Planned” when it shows a \$1.5 million underspend and a 20% unit variance for this program?
- i. Please provide a plan and timeline for completion for the abovementioned incomplete 1,247 Underground General Corrective Maintenance notifications in MAT Code KBA in the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

<b>Step towards completion of incomplete work</b>	<b>How PG&amp;E will Execute this Step</b>	<b>Beginning Date of Step</b>	<b>End Date of Step</b>



**ANSWER 006**

a. PG&E’s portfolio of Maintenance tags are based on observed facility conditions/ Electric Compliance (EC) notification types resulting in a different mix of maintenance work required across the MWCs KA and KB. When planning its resources PG&E prioritizes across all the overhead and underground maintenance programs in KA and KB to ensure compliance and risk reduction, with attention to wildfire risks in HFTDs. PG&E will allocate resources to the highest priority and most risk reducing tags first, regardless of: i) which MAT code it is in, or ii) a previous year's forecast. PG&E allocates the resources to address needs and emergent issues and circumstances, which often results in a different mix of work required than was previously forecasted.

PG&E regularly evaluates its Electric Distribution Maintenance portfolio of programs to address changes over the entire general rate case cycle(s) and to address unanticipated changes and emergent issues and circumstances. As program funding plans and maintenance needs change or emerge, PG&E’s focus continues to be to maintain safety, reliability, risk mitigation, and meeting customers’ demands.

b. As stated in PG&E’s 2023 RSAR, “*Actual program units were below imputed program units due to optimizing resources to focus on completing higher priority maintenance tags within MWCs KA and KB.*” Please also see subpart a. above.

<b>MWC Code</b>	<b>MWC Name</b>	<b>MAT Code</b>	<b>MAT Name</b>	<b>Reason for the reprioritization to this activity</b>
<b>KA</b>	<b>E Dist Maint OH General</b>	<b>Various</b>	<b>Various</b>	PG&E prioritizes across all the overhead and underground maintenance programs in KA and KB to ensure compliance and risk reduction.
<b>KB</b>	<b>E Dist Maint UG</b>	<b>Various</b>	<b>Various</b>	PG&E prioritizes across all the overhead and underground maintenance programs in KA and KB to ensure compliance and risk reduction.

c. “The workplan maintenance schedule and priority of the tags” means the risk informed prioritization approach to address the highest risk maintenance issues on PG&E’s facilities. The maintenance notifications generated through the enhanced inspection program are assigned a priority based on the potential safety impact and scheduled for resolution based on the priority. PG&E uses the following priorities:

- Priority A: The condition is of immediate risk of high potential impact to safety or reliability and requires immediate response and continued action until the condition is repaired and no longer presents a potential hazard (“make safe”).
- Priority B: The condition is of moderate potential impact to safety or reliability. Corrective action is required within 3 months from the date the condition is identified.

- Priority E: The condition is of moderate potential impact to safety or reliability. Corrective action is required within 12 months from the date the condition is identified (or within 6 months if tag creates potential fire ignition risk within HFTD Tier 3).
- Priority F: The condition is of low potential impact to safety or reliability. Corrective action for distribution facilities is recommended within 5 years from the date the condition is identified.
- Priority H: Refers to E & F tags that are bundled into existing system hardening projects.

PG&E utilizes the following risk informed prioritization approach to address the highest risk maintenance issues on PG&E's facilities:

- 1) Address all identified Priority A<sup>5</sup> tags with completion dates immediately, with tags closed no later than 30 days after identification date.
  - 2) Address all identified Priority B tags within three months of the identification date.
  - 3) Prioritize execution of Priority E and F tags based on ignition risk circuit prioritization and/or tag risk score within the timelines noted above.
- d. The workplan maintenance schedule is large and dynamic, changing on a day-to-day basis. When reviewing and prioritizing notifications for scheduling, PG&E considers the Electric Distribution Maintenance Program's prioritization factors and guidelines: (1) priority of the notification, (2) abnormal condition(s), (3) related actions that must be completed before the work can be done (such as work that must be designed prior to construction, planned outages, customer notice/impact, and environmental and permitting requirements), and (4) the availability of resources. When possible, PG&E will bundle tags to optimize resources, environmental and/or land permitting, and minimize outages/customer impacts.
- e. See table below for information regarding the number of **open** maintenance tags that pertain to **MAT KBA**. Please note that there were no X-Tags, as this priority did not come into play until year 2024.

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<sup>5</sup> Priority A tags are executed via PG&E's Emergency Response Program (MWC 17 and BH). Please see PG&E's 2023 GRC, Exhibit (PG&E-4), Ch. 6 for more information.

Date	Number of open A tags	Number of open X tags	Number of open B tags	Number of open E tags	Number of open F tags
January 1 <sup>st</sup> , 2020	2	0	13	591	552
January 1 <sup>st</sup> , 2021	2	0	14	1,295	644
January 1 <sup>st</sup> , 2022	2	0	36	1,969	830
January 1 <sup>st</sup> , 2023	2	0	56	2,206	930
January 1 <sup>st</sup> , 2024	2	0	153	2,481	932

- f. See table below for information regarding the number of **overdue** maintenance tags that pertain to **MAT KBA**. Please note that there were no X-Tags, as this priority did not come into play until year 2024.

Date	Number of overdue A tags	Number of overdue X tags	Number of overdue B tags	Number of overdue E tags	Number of overdue F tags
January 1 <sup>st</sup> , 2020	0	0	10	43	37
January 1 <sup>st</sup> , 2021	0	0	12	25	23
January 1 <sup>st</sup> , 2022	0	0	7	20	17
January 1 <sup>st</sup> , 2023	0	0	15	20	17
January 1 <sup>st</sup> , 2024	0	0	21	7	7

- g. As stated in PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(c),” changes in program implementation do not happen on a given date but are done in response to i) constraints (financial, labor, weather, etc.), and ii) emergent work and changed circumstances that affect PG&E’s Electric Distribution portfolio over time.
- h. The Status column in the RSAR is intended to be PG&E’s current understanding of how the program will proceed compared to the imputed amounts for the remainder of the GRC cycle.<sup>6</sup> As stated in PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(b),” PG&E’s 2023 GRC Application funding request was based on the best available information at the time of the Application, which was submitted in 2021. After the 2023 GRC revenue requirement was adopted, PG&E’s portfolio of Electric Distribution programs were and are subject to change to address emergent work and funding constraints while maintaining the safety and reliability of PG&E’s electric distribution equipment.

<sup>6</sup> See PG&E’s 2023 RSAR Section 1, Section C, Requirement 10.

PG&E will continue to proceed as planned and use its risk-informed prioritization approach to the portfolio of overhead and underground maintenance activity types in MWCs KA and KB. At this time, whether spend in KBA will be higher or lower than what was imputed in the 2023 GRC cannot be accurately predicted and therefore “proceeding as planned” is the most appropriate response.

- i. See PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e).”

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Risk Spending Accountability Report Discovery 2023**  
**Data Response**

PG&E Data Request No.:	CalAdvocates 003-Q007		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates_003-Q007		
Request Date:	June 28, 2024	Requester DR No.:	003
Date Sent:	July 22, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 007**

In line 204 of Table 3-3 of PG&E's 2023 RSAR, PG&E states that it completed 72 fewer Underground Critical Operating Equipment Notifications (MAT Code KBC) in 2023 compared to what was authorized (valued at \$1.1 million). PG&E states that this was "due to optimizing resources to focus on completing higher priority maintenance tags within MWCs KA and KB". PG&E further states "During the GRC cycle PG&E expects to continue to reprioritize the work in MAT KBC to other higher priority maintenance work in MWCs KA and KB."<sup>2</sup>

PG&E requested \$1.4 million for Mat Code KBC for the year 2023 in its TY 2023 GRC testimony<sup>3</sup> and was authorized to spend \$1.4 million in D.23-11-069.<sup>4</sup>

- a. Please state the basis for PG&E continuing to "reprioritize the work in MAT KBC to other higher priority maintenance work in MWCs KA and KB."
- b. Why did PG&E request \$1.5 million for this program for the year 2023 when it anticipates that this is a lower priority program?
- c. When did PG&E become aware that this would be a lower priority program?
- d. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program in 2023, along with the reason for such diversion, in the below table format:

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<sup>1</sup> Pacific Gas and Electric Company, Pacific Gas & Electric Company's (U39M) amendment to the 2023 Risk Spending Accountability Report submitted June 17, 2024 (referred to as "PG&E's 2023 RSAR").

<sup>2</sup> PG&E's 2023 RSAR at 3-10.

<sup>3</sup> A.21-06-021, Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2023., Exhibit (Exh.) PG&E-4 at 13-30.

<sup>4</sup> Decision (D.) 23-11-069 Decision on Test Year 2023 General Rate Case of Pacific Gas and Electric Company, November 16, 2023, at 349.

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity
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e. Please provide information regarding the number of open maintenance tags that

Date	Number of open A tags	Number of open X tags	Number of open B tags	Number of open E tags	Number of open F tags
January 1 <sup>st</sup> , 2020					
January 1 <sup>st</sup> , 2021					
January 1 <sup>st</sup> , 2022					
January 1 <sup>st</sup> , 2023					
January 1 <sup>st</sup> , 2024					

f. Please provide information regarding the number of overdue maintenance tags that pertain to this activity in the below table format:

Date	Number of overdue A tags	Number of overdue X tags	Number of overdue B tags	Number of overdue E tags	Number of overdue F tags
January 1 <sup>st</sup> , 2020					
January 1 <sup>st</sup> , 2021					
January 1 <sup>st</sup> , 2022					
January 1 <sup>st</sup> , 2023					
January 1 <sup>st</sup> , 2024					

g. Please provide a plan and timeline for completion for the abovementioned incomplete 72 Underground Critical Operating Equipment notifications in MAT Code KBC in the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 007**

- a. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_003-Q006(a).”
- b. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(b).”
- c. Please see PG&E’s response to “RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(c).”
- d. As stated in PG&E’s RSAR, “Actual program units were below imputed program units due to optimizing resources to focus on completing higher priority maintenance tags within MWCs KA and KB.” Please also see response to subpart a. above.

<b>MWC Code</b>	<b>MWC Name</b>	<b>MAT Code</b>	<b>MAT Name</b>	<b>Reason for the reprioritization to this activity</b>
<b>KA</b>	<b>E Dist Maint OH General</b>	<b>Various</b>	<b>Various</b>	PG&E prioritizes across all the overhead and underground maintenance programs in KA and KB to ensure compliance and risk reduction.
<b>KB</b>	<b>E Dist Maint UG</b>	<b>Various</b>	<b>Various</b>	PG&E prioritizes across all the overhead and underground maintenance programs in KA and KB to ensure compliance and risk reduction.

- e. See table below for information regarding the number of open maintenance tags that pertain to MAT KBC. Please note that there were no X-Tags, as this priority did not come into play until Year 2024.

<b>Date</b>	<b>Number of open A tags</b>	<b>Number of open X tags</b>	<b>Number of open B tags</b>	<b>Number of open E tags</b>	<b>Number of open F tags</b>
January 1 <sup>st</sup> , 2020	0	0	0	0	0
January 1 <sup>st</sup> , 2021	0	0	0	0	0
January 1 <sup>st</sup> , 2022	0	0	0	0	0
January 1 <sup>st</sup> , 2023	0	0	0	0	0
January 1 <sup>st</sup> , 2024	0	0	0	0	0

PG&E has no record of any open A, X, B, E or F tags that pertain to MAT Code KBC, thus all values in the table above are zero.

- f. See table below for information regarding the number of **overdue** maintenance tags that pertain to **MAT KBC**. Please note that there were no X-Tags, as this priority did not come into play until Year 2024.

<b>Date</b>	<b>Number of overdue A tags</b>	<b>Number of overdue X tags</b>	<b>Number of overdue B tags</b>	<b>Number of overdue E tags</b>	<b>Number of overdue F tags</b>
January 1 <sup>st</sup> , 2020	0	0	0	0	0
January 1 <sup>st</sup> , 2021	0	0	0	0	0
January 1 <sup>st</sup> , 2022	0	0	0	0	0
January 1 <sup>st</sup> , 2023	0	0	0	0	0
January 1 <sup>st</sup> , 2024	0	0	0	0	0

PG&E has no record of any overdue A, X, B, E or F tags that pertain to MAT Code KBC, thus all values in the table above are zero.

- g. See PG&E's response to "RSARDiscovery2023\_DR\_CalAdvocates\_001-Q001(e)."



**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 004-Q001		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 004-Q001		
Request Date:	July 9, 2024	Requester DR No.:	004 Amended
Date Sent:	July 23, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 001**

In line 51 of Table 2-3 of PG&E's 2023 RSAR, PG&E states that it did not complete 341 casing test station installations (MAT code DGG) for the year 2023 (valued at \$754,000). PG&E states "Actual units were lower than imputed units due to: 1) reprioritization in support of higher risk or compliance work; and 2) higher than expected unit costs due to the need for more detailed permit sketches to meet agency requirements, permitting and restoration costs, and increases in contract labor costs"<sup>2</sup>

- a. Please state the basis for the abovementioned reprioritization.
- b. What activities comprise the abovementioned "higher risk or compliance work"?
- c. Please list and describe all drivers of the abovementioned increased unit costs.
- d. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity

- e. Please provide a plan and timeline for completion for the abovementioned 341 casing test station installations for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

<sup>1</sup> Pacific Gas and Electric Company, *Pacific Gas & Electric Company's (U39M) amendment to the 2023 Risk Spending Accountability Report* submitted June 17, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 2-11.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 001**

- a. While this data request questions program MATs that specifically did not complete the 2023 dollars/units adopted in the 2023 GRC, it is important to consider the overall Electric/Gas portfolio level as well as the Enterprise level. The decisions to reprioritize lower risk work to fund higher risk work, or managing costs to counterbalance areas where more was spent, is a normal part of the in-year budgeting and portfolio management process. <sup>3</sup>

As explained in PG&E’s 2023 RSAR, in 2023, “PG&E continued its wildfire risk and electric risk reduction activities and programs to continue delivering on the company’s wildfire mitigation plans. For the majority of the year, there also was uncertainty associated with the pending 2023 GRC Decision, which was not issued until November 2023. Given so, variances resulted as PG&E executed all planning work and much of the physical work before the decision. PG&E’s 2023 portfolio focused on wildfire and electric risk reduction and support, and increased volume of customer connection and emergency response demand. In addition, across the company’s functional areas prioritization focused on implementing efficiency opportunities, identifying lower priority work to be rescheduled, and making forecast refinements. When applicable, PG&E’s variance explanations include further details regarding changes in priority that led to a shifting of funds between programs.” <sup>4</sup>

In addition, Gas expense and capital programs were also impacted by in year reprioritization efforts within Gas and/or Enterprise wide, driven by cost pressures due to an inflationary environment, the Gas workplan exceeding the enterprise set budget, and a need to support higher risk programs. Gas created a bottom-up forecast based on known work that was executable and resource balanced. Gas utilized the Risk Based Portfolio Prioritization Framework (RBPPF) to ensure that high priority and compliance-based MATs were appropriately funded. Programs that did not include mandatory compliance work, regulatory commitments, or high-risk work were considered for funding reallocation after conducting review to account for safety, reliability, capacity, and any other operational risks.” <sup>5</sup>

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<sup>3</sup> The Commission has said: “It is generally recognized that when a utility files a GRC, expenditure estimates are based on plans and preliminary budgets developed at least two years in advance of when they will actually be incurred. When the Utility finalizes its budget just prior to the year when costs will be incurred or adjusts the budget during the year, new programs or projects may come up, others may be cancelled, and there may be reprioritization. This process is expected and is necessary for the Utility to manage its operations in a safe and reliable manner.” D.11-05-018, p. 27. The Commission made this point more succinctly in Finding of Fact 10: “A reprioritization process is expected and necessary for the Utility to manage its operations in a safe and reliable manner.” Id. at p. 82.

<sup>4</sup> See PG&E’s 2023 RSAR, p. 1-4 to 1-5.

<sup>5</sup> See PG&E’s 2023 RSAR, p. 1-13.

- b. See PG&E's response to subpart a.
- c. PG&E's 2023 GRC Application funding request was based on the best available information at the time of the Application, which was submitted in 2021. This did not comprehensively account for the costs associated with developing the job scope, preparing construction drawings, acquiring encroachment, and land permits necessary for construction execution. Additional permit restrictions and employee safety considerations led to design changes which increased the cost for trenching and restoration, thereby raising the overall unit cost for the program.
- d. See PG&E's response to subpart a.
- e. PG&E objects to this question on the grounds that plans and timelines for completion of programs are beyond the scope of RSAR. In the Risk OIR (R.20-07-013), Cal Advocates proposed that utilities be required to provide an "RSAR Action Plan" including anticipated completion dates or a justification as to why the work cannot be completed within the expected timeline. The Commission rejected this proposal stating:

*We appreciate Cal Advocate's attention to RSAR requirements but do not approve the RSAR Action Plan concept as proposed by Cal Advocates at this time. The IOUs already must report and describe variances at the individual program level within the RSAR. Additionally, this decision requires the IOUs to track cumulative expenditures throughout the GRC cycle and the completion status of each program (see section 3.2.7). The cumulative tracking will identify programs that may have chronic spending variances. The requirement for project status reporting requires IOUs to estimate if a project will be completed as originally scoped. These requirements now address two key components of the Cal Advocates proposed RSAR Action Plan. Based on these improvements to RSAR requirements, we do not foresee the need for an RSAR Action Plan at this time. (D.22-10-002, p. 41.)*

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 004-Q002		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates_004-Q002		
Request Date:	July 9, 2024	Requester DR No.:	004 Amended
Date Sent:	July 23, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 002**

In Line 132 of Table 2-3 in PG&E's 2023 RSAR, PG&E states that it completed 95 more gas distribution service repairs (MAT code FIO) for the year 2023 compared to what was authorized, and also reports a \$2.2 million overspend in this program for 2023. PG&E states that "Actual units were higher than imputed units due to: 1) more encroachments being identified in the field than anticipated (higher find rate), and 2) execution of a backlog of potential encroachments."<sup>2</sup>

- a. Please provide the extent of the backlog of potential encroachments.
- b. By when does PG&E expect to complete the backlog of potential encroachments?

**ANSWER 002**

- a. PG&E currently has 591 indications of encroachments systemwide. These potential encroachments will be field verified prior to materializing into capital or expense projects.
- b. Encroachments are identified through system inspections and are corrected following the timeline provided in GO-112F.

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<sup>1</sup> Pacific Gas and Electric Company, *Pacific Gas & Electric Company's (U39M) amendment to the 2023 Risk Spending Accountability Report* submitted June 17, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 2-12.

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 004-Q003		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 004-Q003		
Request Date:	July 9, 2024	Requester DR No.:	004 Amended
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PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 003**

In line 167 of Table 2-3 of PG&E's 2023 RSAR, PG&E states that it did not complete 341 fitting mitigations (MAT code JQG) for the year 2023 (valued at \$447,000). PG&E states that this is "due to reprioritization in support of higher risk or compliance work."<sup>2</sup>

- a. Please state the basis for the abovementioned reprioritization.
- b. What activities comprise the abovementioned "higher risk or compliance work?"
- c. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity

- d. Please provide a plan and timeline for completion for the abovementioned 341 fitting mitigations for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step

<sup>1</sup> Pacific Gas and Electric Company, *Pacific Gas & Electric Company's (U39M) amendment to the 2023 Risk Spending Accountability Report* submitted June 17, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 2-12.

**ANSWER 003**

- a. See PG&E’s response “RSAR-Discovery2023\_DR\_CalAdvocates\_004-Q001(a),” for information regarding PG&E’s cross-functional area reprioritization and Gas portfolio prioritization.
- b. See PG&E’s response to subpart a.
- c. See PG&E’s response to subpart a.

<b>MWC Code</b>	<b>MWC Name</b>	<b>MAT Code</b>	<b>MAT Name</b>	<b>Reason for the reprioritization to this activity</b>
FI	G Dist Corrective Maint	FIG	Maint-Corr-G Main Lk	Leaks were identified during DIMP Leak survey that were not accounted for in the annual plan or GRC.
FI	G Dist Corrective Maint	FIP	Maint-Corr_G_Svc Leak_BG	

- d. See PG&E’s response “RSAR-Discovery2023\_DR\_CalAdvocates\_004-Q001(e).”

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 004-Q004		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 004-Q004		
Request Date:	July 9, 2024	Requester DR No.:	004 Amended
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PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 004**

In line 1 of Table 2-4 of PG&E's 2023 RSAR, PG&E states that it did not complete 35,309 feet of gas main installation for its pipeline replacement program (MAT Code 14A) for the year 2023 compared to what was authorized (valued at \$5.2 million). PG&E states "Actual units were lower than imputed units due to weather impacts, crew reallocation to support higher risk or compliance work and projects being rescheduled due to high unit cost."<sup>2</sup>

- a. Please list and describe the abovementioned weather impacts and their effect on work completion for this program.
- b. Please state the basis for the abovementioned "crew reallocation to support higher risk or compliance work."
- c. What activities comprise the abovementioned "higher risk or compliance work?"
- d. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity

- e. Please list and describe all drivers of the abovementioned "high unit cost".
- f. What was PG&E's threshold for rescheduling a particular projects based on the abovementioned "high unit cost"?
- g. Please provide a plan and timeline for completion for the abovementioned 35,309 feet of gas main installation for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for

<sup>1</sup> Pacific Gas and Electric Company, *Pacific Gas & Electric Company's (U39M) amendment to the 2023 Risk Spending Accountability Report* submitted June 17, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 2-13.

completion of this work. The final row should be the completion of this incomplete work.

<b>Step towards completion of incomplete work</b>	<b>How PG&amp;E will Execute this Step</b>	<b>Beginning Date of Step</b>	<b>End Date of Step</b>
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**ANSWER 004**

- a. January through March held unprecedented storms, PG&E was unable to perform the amount of work planned. Construction crews were reallocated to respond to storms.
- b. See PG&E’s response “RSAR-Discovery2023\_DR\_CalAdvocates\_004-Q001(a),” for information regarding PG&E’s cross-functional area reprioritization and Gas portfolio prioritization.
- c. See PG&E’s response to subpart b.
- d. See PG&E’s response to subpart b.
- e. High unit cost was due to increase in Paving, Overheads, Sewer Lateral Inspections, Shoring and Plate Rental, Traffic Controls contracts cost.
- f. The threshold used to determine rescheduling projects was to meet the total budget for main replacement work, not a unit cost threshold.
- g. See PG&E’s response “RSAR-Discovery2023\_DR\_CalAdvocates\_004-Q001(e).”



**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

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Request Date:	July 9, 2024	Requester DR No.:	004 Amended
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PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company’s (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 005**

In line 5 of Table 2-4 of PG&E’s 2023 RSAR, PG&E states that it did not complete 289,083 feet of gas main installation for its plastic pipe replacement program (MAT Code 14D) for the year 2023 compared to what was authorized (valued at \$35 million). PG&E states “Actual units were lower than imputed units due to weather impacts, crew reallocation to support higher risk or compliance work and projects being rescheduled due to high unit cost.”<sup>2</sup>

- a. Please list and describe the abovementioned weather impacts and their effect on work completion for this program.
- b. Please state the basis for the abovementioned “crew reallocation to support higher risk or compliance work.”
- c. What activities comprise the abovementioned “higher risk or compliance work?”
- d. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity

- e. Please list and describe all drivers of the abovementioned “high unit cost.”
- f. What was PG&E’s threshold for rescheduling a particular project based on the abovementioned “high unit cost?”
- g. Please provide a plan and timeline for completion for the abovementioned 289,083 feet of gas main installation for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for

<sup>1</sup> Pacific Gas and Electric Company, *Pacific Gas & Electric Company’s (U39M) amendment to the 2023 Risk Spending Accountability Report* submitted June 17, 2024 (referred to as “PG&E’s 2023 RSAR”)

<sup>2</sup> PG&E’s 2023 RSAR at 2-13.

completion of this work. The final row should be the completion of this incomplete work.

<b>Step towards completion of incomplete work</b>	<b>How PG&amp;E will Execute this Step</b>	<b>Beginning Date of Step</b>	<b>End Date of Step</b>
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**ANSWER 005**

- a. January through March held unprecedented storms, PG&E was unable to perform the amount of work planned. Construction crews were reallocated to respond to storms.
- b. See PG&E’s response “RSAR-Discovery2023\_DR\_CalAdvocates\_004-Q001(a),” for information regarding PG&E’s cross-functional area reprioritization and Gas portfolio prioritization.
- c. See PG&E’s response to subpart b.
- d. See PG&E’s response to subpart b.
- e. High unit cost was due to increase in Paving, Overheads, Sewer Lateral Inspections, Shoring and Plate Rental, Traffic Controls contracts cost.
- f. The threshold used to determine rescheduling projects was to meet the total budget for main replacement work, not a unit cost threshold.
- g. See PG&E’s response “RSAR-Discovery2023\_DR\_CalAdvocates\_004-Q001(e).”

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

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PG&E Witness:	N/A	Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 006**

In line 7 of Table 2-4 of PG&E's 2023 RSAR, PG&E states that it did not complete 95 service corrections for its Gas Meter Protection program (MAT Code 27A) for the year 2023 compared to what was authorized (valued at \$2.4 million). PG&E states "Actual units were lower than imputed units due to reprioritization in support of higher risk or compliance work." PG&E further states "The purpose of this program is to complete remediations to the AOC backlog in a reasonable amount of time while at the same time also performing ongoing AOC findings and repairs with available resources."<sup>2</sup>

- a. Please state the basis for the abovementioned "reprioritization in support of higher risk or compliance work".
- b. What activities comprise the abovementioned "higher risk or compliance work"?
- c. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity

- d. Please spell out the acronym "AOC" as quoted above.
- e. Please describe what is meant by "a reasonable amount of time" to complete remediation of the AOC backlog.
- f. Please provide a plan and timeline for completion for the abovementioned 95 service corrections for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

<sup>1</sup> Pacific Gas and Electric Company, *Pacific Gas & Electric Company's (U39M) amendment to the 2023 Risk Spending Accountability Report* submitted June 17, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 2-13.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 006**

- a. See PG&E’s response “RSARDiscovery2023\_DR\_CalAdvocates\_004-Q001(a),” for information regarding PG&E’s cross-functional area reprioritization and Gas portfolio prioritization.

Meter Protection work is required in accordance with 49 CFR Section 192.353 to prevent damage from vehicles. This code section does not define a time requirement to remedy locations. Locations that require meter protection are flagged as an abnormal operating condition (AOC). Meter protection remediation can be achieved through bollard installation (expense MAT EXB) or through the re-location of the meter set (capital MAT 27A).

MAT 27A does not have a regulatory specified time for meter protection remediations. Additionally, from a reliability perspective, the risk is limited to a single service or a multi-meter manifold, which limits customer impact. Because of these factors, MAT 27A was eligible for reprioritization in 2023.

- b. See PG&E’s response to subpart a.
- c. See PG&E’s response to subpart a.
- d. AOC refers to Abnormal Operating Conditions.
- e. ‘A reasonable amount of time’ to complete remediation of the AOC backlog means ‘by the next inspection cycle’ which is 3 years. Additionally, this is a requirement of PG&E’s Gas Distribution Work and Compliance Matrix Procedure (TD-4854P-01).
- f. See PG&E’s response “RSARDiscovery2023\_DR\_CalAdvocates\_004-Q001(e).”

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 004-Q007		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 004-Q007		
Request Date:	July 9, 2024	Requester DR No.:	004 Amended
Date Sent:	July 23, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 007**

In line 28 of Table 2-4 of PG&E's 2023 RSAR, PG&E states that it did not complete 28,705 feet of gas main installation for its gas distribution reliability program (MAT Code 50A) for the year 2023 compared to what was authorized (valued at \$5 million). PG&E states "Actual units were lower than imputed units due to weather impacts, crew reallocation to support higher risk or compliance work and projects being rescheduled due to high unit cost."<sup>2</sup>

- a. Please list and describe the abovementioned weather impacts and their effect on work completion for this program.
- b. Please state the basis for the abovementioned "crew reallocation to support higher risk or compliance work."
- c. What activities comprise the abovementioned "higher risk or compliance work?"
- d. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity

- e. Please list and describe all drivers of the abovementioned "high unit cost."
- f. What was PG&E's threshold for rescheduling a particular projects based on the abovementioned "high unit cost?"
- g. Please provide a plan and timeline for completion for the abovementioned 28,705 feet of gas main installation for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for

<sup>1</sup> Pacific Gas and Electric Company, *Pacific Gas & Electric Company's (U39M) amendment to the 2023 Risk Spending Accountability Report* submitted June 17, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 2-13.

completion of this work. The final row should be the completion of this incomplete work.

<b>Step towards completion of incomplete work</b>	<b>How PG&amp;E will Execute this Step</b>	<b>Beginning Date of Step</b>	<b>End Date of Step</b>
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**ANSWER 007**

- a. January through March held unprecedented storms, PG&E was unable to perform the amount of work planned. Construction crews were reallocated to respond to storms.
- b. See PG&E’s response “RSARDiscovery2023\_DR\_CalAdvocates\_004-Q001(a),” for information regarding PG&E’s cross-functional area reprioritization and Gas portfolio prioritization.
- c. See PG&E’s response to subpart b.
- d. See PG&E’s response to subpart b.
- e. High unit cost was due to increase in Paving, Overheads, Sewer Lateral Inspections, Shoring and Plate Rental, Traffic Controls contracts cost.
- f. The threshold used to determine rescheduling projects was to meet the total budget for main replacement work, not a unit cost threshold.
- g. See PG&E’s response “RSARDiscovery2023\_DR\_CalAdvocates\_004-Q001(e).”

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 004-Q008		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 004-Q008		
Request Date:	July 9, 2024	Requester DR No.:	004 Amended
Date Sent:	July 23, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 008**

In line 37 of Table 2-9 of PG&E's 2023 RSAR, PG&E states that it did not complete 273 units of work in its Close Internal Survey program (MAT Code GJE) for the year 2023 compared to what was authorized (valued at \$2.3 million). PG&E lists the unit type for this program as "Various." PG&E states that "Actual units were lower than imputed units due to reprioritization in support of higher risk or compliance work."<sup>2</sup>

- a. Please list and describe all work units that are captured by the term "various" quoted above.
- b. Please state the basis for the abovementioned "reprioritization in support of higher risk or compliance work."
- c. What activities comprise the abovementioned "higher risk or compliance work?"
- d. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity

- e. Please provide a plan and timeline for completion for the abovementioned 273 incomplete units of work for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

<sup>1</sup> Pacific Gas and Electric Company, *Pacific Gas & Electric Company's (U39M) amendment to the 2023 Risk Spending Accountability Report* submitted June 17, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 2-55

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 008**

- a. Units for Close Interval Survey (CIS) MAT GJE includes “# of CIS Miles Surveyed” and “# of CIS Digs”.
- b. See PG&E’s response “RSARDiscovery2023\_DR\_CalAdvocates\_004-Q001(a),” for information regarding PG&E’s cross-functional area reprioritization and Gas portfolio prioritization.
- c. See PG&E’s response to subpart b.
- d. See PG&E’s response to subpart b.
- e. See PG&E’s response “RSARDiscovery2023\_DR\_CalAdvocates\_004-Q001(e).”



**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 004-Q009		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 004-Q009		
Request Date:	July 9, 2024	Requester DR No.:	004 Amended
Date Sent:	July 23, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 009**

In line 195 of Table 2-9 of PG&E's 2023 RSAR, PG&E states that it did not complete 3 miles of shallow and exposed pipe mitigation (MAT Code JT4) for the year 2023 compared to what was authorized (valued at \$1.8 million). PG&E states that "Actual units were lower than imputed units due to reprioritization in support of higher risk or compliance work."<sup>2</sup>

- a. Please state the basis for the abovementioned "reprioritization in support of higher risk or compliance work."
- b. What activities comprise the abovementioned "higher risk or compliance work?"
- c. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity

- d. Please provide a plan and timeline for completion for the abovementioned incomplete 3 miles of shallow and exposed pipe mitigation for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

<sup>1</sup> Pacific Gas and Electric Company, *Pacific Gas & Electric Company's (U39M) amendment to the 2023 Risk Spending Accountability Report* submitted June 17, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 2-63.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 009**

- a. See PG&E’s response “RSARDiscovery2023\_DR\_CalAdvocates\_004-Q001(a),” for information regarding PG&E’s cross-functional area reprioritization and Gas portfolio prioritization.
- b. See PG&E’s response to subpart a.
- c. See PG&E’s response to subpart a.
- d. See PG&E’s response “RSARDiscovery2023\_DR\_CalAdvocates\_004-Q001(e).”

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 004-Q010		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates_004-Q010		
Request Date:	July 9, 2024	Requester DR No.:	004 Amended
Date Sent:	July 23, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 010**

In line 50 of Table 2-10 of PG&E's 2023 RSAR, PG&E states that it did not complete 16 valve automation projects (MAT Code 75I) compared to what was authorized for the year 2023 (valued at \$18.6 million). PG&E states that "Actual units were lower than imputed units due to reprioritization in support of higher risk or compliance work."<sup>2</sup>

- a. Please state the basis for the abovementioned "reprioritization in support of higher risk or compliance work."
- b. What activities comprise the abovementioned "higher risk or compliance work?"
- c. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity

- d. Please provide a plan and timeline for completion for the abovementioned incomplete 3 miles of shallow and exposed pipe mitigation for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

<sup>1</sup> Pacific Gas and Electric Company, *Pacific Gas & Electric Company's (U39M) amendment to the 2023 Risk Spending Accountability Report* submitted June 17, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 2-69.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 010**

- a. See PG&E’s response “RSARDiscovery2023\_DR\_CalAdvocates\_004-Q001(a),” for information regarding PG&E’s cross-functional area reprioritization and Gas portfolio prioritization.
- b. See PG&E’s response to subpart a.
- c. See PG&E’s response to subpart a.
- d. See PG&E’s response “RSARDiscovery2023\_DR\_CalAdvocates\_004-Q001(e).”

**PACIFIC GAS AND ELECTRIC COMPANY  
Risk Spending Accountability Report Discovery 2023  
Data Response**

PG&E Data Request No.:	CalAdvocates 004-Q011		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates 004-Q011		
Request Date:	July 9, 2024	Requester DR No.:	004 Amended
Date Sent:	July 23, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company's (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 011**

In line 112 of Table 2-10 of PG&E's 2023 RSAR, PG&E states that it did not complete 9 meters of Gas Gathering for the Gas Transmission Gas Gathering System Management Program (MAT Code 84D) projects compared to what was authorized for the year 2023 (valued at \$18.6 million). PG&E states that "Actual units were lower than imputed units due to reprioritization in support of higher risk or compliance work."<sup>2</sup>

- a. Please state the basis for the abovementioned "reprioritization in support of higher risk or compliance work."
- b. What activities comprise the abovementioned "higher risk or compliance work?"
- c. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from this program, along with the reason for such diversion, in the below table format:

MWC Code	MWC Name	MAT Code	MAT Name	Reason for the reprioritization to this activity

- d. Please provide a plan and timeline for completion for the abovementioned incomplete 9 meters of Gas Gathering for the Gas Transmission Gas Gathering System Management Program for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

<sup>1</sup> Pacific Gas and Electric Company, *Pacific Gas & Electric Company's (U39M) amendment to the 2023 Risk Spending Accountability Report* submitted June 17, 2024 (referred to as "PG&E's 2023 RSAR")

<sup>2</sup> PG&E's 2023 RSAR at 2-73.

Step towards completion of incomplete work	How PG&E will Execute this Step	Beginning Date of Step	End Date of Step
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**ANSWER 011**

- a. See PG&E’s response “RSARDiscovery2023\_DR\_CalAdvocates\_004-Q001(a),” for information regarding PG&E’s cross-functional area reprioritization and Gas portfolio prioritization.
- b. See PG&E’s response to subpart a.
- c. See PG&E’s response to subpart a.
- d. See PG&E’s response “RSARDiscovery2023\_DR\_CalAdvocates\_004-Q001(e).”

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Risk Spending Accountability Report Discovery 2023**  
**Data Response**

PG&E Data Request No.:	CalAdvocates 004-Q012		
PG&E File Name:	RSARDiscovery2023_DR_CalAdvocates_004-Q012		
Request Date:	July 9, 2024	Requester DR No.:	004 Amended
Date Sent:	July 23, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Miles Gordon

The questions below pertain to Pacific Gas & Electric Company’s (PG&E) 2023 Risk Spending Accountability Report.<sup>1</sup>

**QUESTION 012**

In line 46 of Table 2-10 of PG&E’s 2023 RSAR, PG&E states that it did not complete .27 miles of vintage pipe replacement (MAT Code 75E) compared to what was authorized for the year 2023 (valued at \$1.9 million). PG&E states that “Actual units were lower than imputed units due to reprioritization in support of higher risk or compliance work.”<sup>2</sup>

In PG&E’s 2024 Gas Safety Plan, PG&E presents the following table that shows work completion for what it terms the “Vintage Pipe Replacement Program” (reproduced below):<sup>3</sup>

Table 21 – Vintage Pipe Replacement Program			
	Miles Replaced	Additional Miles Addressed	Percentage of High Risk Mileage Addressed <sup>(a)</sup>
<b>Pre-2015</b>	20.2 miles	1.3 miles	20 percent
<b>2015</b>	5.9 miles	12.7 miles	41 percent
<b>2016</b>	6.7 miles	8.8 miles	45 percent
<b>2017</b>	3.5 miles	11.5 miles	61 percent
<b>2018</b>	20.6 miles	0 miles	74 percent
<b>2019</b>	2.06 miles	0.75 miles	75 percent
<b>2020</b>	1.32 miles	0 miles	77 percent
<b>2021</b>	3.22 miles	0 miles	78 percent
<b>2022</b>	0.15 miles	0 miles	79 percent
<b>2023</b>	0.05 miles	0.01 miles	80 percent
<b>Program Target:</b>	123 miles		100 percent <sup>(b)</sup>

PG&E notes that “High risk mileage addressed includes retirements and mileage replaced in other pipe replacement programs from 2015-2023 that had an identified vintage threat.”

<sup>1</sup> Pacific Gas and Electric Company, *Pacific Gas & Electric Company’s (U39M) amendment to the 2023 Risk Spending Accountability Report* submitted June 17, 2024 (referred to as “PG&E’s 2023 RSAR”)

<sup>2</sup> PG&E’s 2023 RSAR at 2-73.

<sup>3</sup> Pacific Gas & Electric Company, *2024 Gas Safety Plan*, March 15<sup>th</sup>, 2024, at 61.

- a. Is the Vintage Pipe Replacement Program mentioned in the above table analogous to MAT Code 75E as reported in line 46 of PG&E’s 2023 RSAR?
- b. If the answer to subpart “a” is yes, please explain why PG&E’s 2023 RSAR reports .27 miles completed under this program, whereas the above table reports .05 miles completed and .01 miles “additional addressed” in 2023.
- c. If the answer to subpart “a” is “no,” please provide the MWC and MAT Code(s) that comprise the Vintage Pipe Replacement Program mentioned in the above table.
- d. Regarding the Vintage Pipe replacement program mentioned in PG&E’s 2024 Gas Safety Plan, please provide a plan and timeline for completion of this program (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

<b>Step towards completion of incomplete work</b>	<b>How PG&amp;E will Execute this Step</b>	<b>Beginning Date of Step</b>	<b>End Date of Step</b>
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- e. Please state the basis for the abovementioned “reprioritization in support of higher risk or compliance work” for MAT Code 75E.
- f. What activities comprise the abovementioned “higher risk or compliance work?”
- g. Please list each activity (including MWC code, MWC Name, MAT Code, and MAT name) to which resources were diverted from MAT Code 75E, along with the reason for such diversion, in the below table format:

<b>MWC Code</b>	<b>MWC Name</b>	<b>MAT Code</b>	<b>MAT Name</b>	<b>Reason for the reprioritization to this activity</b>
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- h. Please provide a plan and timeline for completion for the abovementioned incomplete .27 miles of vintage pipe replacement in MAT Code 75E for the year 2023 in the below table (adding rows as needed). Include how PG&E will execute completion of each step provided for completion of this work. The final row should be the completion of this incomplete work.

<b>Step towards completion of incomplete work</b>	<b>How PG&amp;E will Execute this Step</b>	<b>Beginning Date of Step</b>	<b>End Date of Step</b>
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**ANSWER 012**

- a. No. As noted in the footnote to the table in PG&E’s 2024 Gas Safety Plan, the replacement mileage in the table captures any high-risk vintage feature completed in the Vintage Pipe program and other pipe replacement and retirement programs.
- b. PG&E’s RSAR reported 0.0 miles for MAT Code 75E.
- c. The miles in PG&E’s 2024 Gas Safety Plan for 2023 represents work in MAT Codes 75K and 75J.
- d. See PG&E’s response “RSARDiscovery2023\_DR\_CalAdvocates\_004-Q001(e).”



- e. See PG&E's response "RSARDiscovery2023\_DR\_CalAdvocates\_004-Q001(a)," for information regarding PG&E's cross-functional area reprioritization and Gas portfolio prioritization.
- f. See PG&E's response to subpart e.
- g. See PG&E's response to subpart e.
- h. See PG&E's response "RSARDiscovery2023\_DR\_CalAdvocates\_004-Q001(e)."

## **APPENDIX C:**

### **Email Chain between PG&E and Cal Advocates Regarding PG&E's Inadequate Discovery Responses**

## Gordon, Miles

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**From:** Matthews, Walker (Law) <waml@pge.com>  
**Sent:** Tuesday, August 20, 2024 3:05 PM  
**To:** Wuerth, Angela  
**Cc:** Parkes, Christopher; Gordon, Miles; Ouborg, Peter (Law); Hudson, Lauren  
**Subject:** [EXTERNAL] RE: PGE's Data Request Responses - Failure to Respond / Meet and Confer

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Angela:

This email provides PG&E's follow up to the August 15, 2024 meet and confer meeting to address Cal Advocates' contention that PG&E failed to respond to certain data requests propounded by Cal Advocates seeking further clarification of PG&E's 2023 RSAR report. Specifically, for certain identified programs where in 2023 PG&E performed less than the GRC adopted/authorized work, Cal Advocates requested that PG&E "provide a plan and timeline for completion" of the under-performed work. PG&E's response to Cal Advocates' data requests for these programs was twofold.

First PG&E explained that decisions to reprioritize lower risk work to fund higher risk work, or managing costs to counterbalance areas where more was spent, is a normal part of the in-year budgeting and portfolio management process. PG&E further described our process to address changes over the general rate case cycle(s) and to address unanticipated changes and emergent issues and circumstances. (See responses to Cal Advocates DR 001-Q001(a) (Electric) and DR 004-Q001(a) (Gas)).

Second, PG&E objected to the request for "completion plans" on the ground that the Commission rejected Cal Advocates' recommendation that such plans be required as part of the RSAR. D.22-10-002, p. 41.

In our meet and confer with Cal Advocates, PG&E further stated that it has already provided as part of its RSAR information regarding the specific programs at issue including a variance explanation and completion status statement for each program as required by the Commission in D. 22-10-002. PG&E nevertheless committed at the conclusion of the meet and confer to reach out internally to see if it could provide further information in response to Cal Advocates' data requests.

After reaching out to our managers responsible for the programs referenced in Cal Advocates' data requests, PG&E supplements its response as follows:

In response to our outreach, program owners did not identify any specific action plans to complete the program work at adopted/authorized levels within the 2023 GRC period. However, as we explained in our data request responses, all programs are subject to ongoing evaluation and reprioritization. It is thus possible that for certain programs PG&E will make up units less than adopted/authorized levels during the remaining three years of the rate case cycle. The progress for each program against adopted/authorized levels will be transparent because the RSAR requires the IOUs to track cumulative expenditures throughout the GRC cycle and the completion status of each program. D.22-10-002, p. 41.

Please let us know if you have any further questions, or would like to discuss the above response.

Best regards,

Al Matthews

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**From:** Wuerth, Angela <Angela.Wuerth@cpuc.ca.gov>  
**Sent:** Tuesday, August 20, 2024 11:50 AM  
**To:** Matthews, Walker (Law) <waml@pge.com>  
**Cc:** Parkes, Christopher <christopher.parkes@cpuc.ca.gov>; Gordon, Miles <Miles.Gordon@cpuc.ca.gov>; Ouborg, Peter (Law) <PXO2@pge.com>  
**Subject:** RE: PGE's Data Request Responses - Failure to Respond / Meet and Confer

**CAUTION: EXTERNAL SENDER!**

This email was sent from an EXTERNAL source. Do you know this person? Are you expecting this email? Are you expecting any links or attachments? If suspicious, do not click links, open attachments, or provide credentials. Don't delete it. **Report it by using the "Report Phish" button.**

Dear Al,

Per the email chain below, PG&E objected to, and refused to provide information in response to, the data requests referenced in my August 15 email. The parties met and conferred to resolve this discovery dispute. At our meeting, PG&E agreed to get back to us early this week regarding this discovery dispute. We still have not heard back from PG&E.

Please respond by the **end of the day today** with one of the following:

- Supplemental data request responses that withdraw PG&E's objections and provide the information requested; **or**
- An email verifying that PG&E is not withdrawing its objections and will not provide the information requested.

Very kind regards,

Angela

---

**From:** Wuerth, Angela  
**Sent:** Thursday, August 15, 2024 1:37 PM  
**To:** [waml@pge.com](mailto:waml@pge.com)  
**Cc:** Parkes, Christopher <[christopher.parkes@cpuc.ca.gov](mailto:christopher.parkes@cpuc.ca.gov)>; Gordon, Miles <[Miles.Gordon@cpuc.ca.gov](mailto:Miles.Gordon@cpuc.ca.gov)>; Ouborg, Peter (Law) <[PXO2@pge.com](mailto:PXO2@pge.com)>  
**Subject:** RE: PGE's Data Request Responses - Failure to Respond / Meet and Confer

Al,

Today, Chris Parkes, Miles Gorden, and I (on behalf of Cal Advocates) met with Peter Ouborg, Lauren Hudson, and you (on behalf of PG&E).

At the beginning of the meeting, Cal Advocates clarified that PG&E failed to respond to the following data requests:

- Data Request 1: Questions 1(e), 2(e), 3(e), 4(e), 5(d), 6(e), 7(e), 8(e), 9(e), and 10(e)
- Data Request 2: Questions 1(e), 2(b), 3(f), 4(e), 5(e), 6(e), 7(e), 8(e), 9(e), 10(e), and 11(e).
- Data Request 3: Questions 1(c), 2(c), 3(c), 4(c), 5(c), 6(l), and 7(g).
- Data Request 4: Question 1(e), 3(d), 4(g), 5(g), 6(f), 7(g), 8(e), 9(d), 10(d), 11(e), and 12(g).

At the meeting, Cal Advocates reiterated that PG&E's objections to Cal Advocates' data requests lacked merit. Specifically, PG&E objected on the basis that Cal Advocates' requests were beyond the scope of the Risk Spending Accountability Report (RSAR). However, Cal Advocates' broad discovery rights are not limited to proceedings; instead, Cal Advocates has the right to issue discovery at any time and for any purpose related to the scope of its work at the Commission. (D.01-08-062 at 7.)

PG&E stated that it disagreed with Cal Advocates. PG&E also clarified that the requested information does not exist at the level of granularity requested for most programs. At the end of the meeting, PG&E said its representatives would confer internally to discuss whether PG&E would be able to provide any information in response to Cal Advocates' data requests. PG&E also said it would get back to Cal Advocates early next week, acknowledging that RSAR comments are due on Wednesday, August 21.

Very kind regards,

Angela

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**From:** Wuerth, Angela  
**Sent:** Monday, August 12, 2024 9:15 AM  
**To:** [waml@pge.com](mailto:waml@pge.com)  
**Cc:** Parkes, Christopher <[christopher.parkes@cpuc.ca.gov](mailto:christopher.parkes@cpuc.ca.gov)>; Gordon, Miles <[Miles.Gordon@cpuc.ca.gov](mailto:Miles.Gordon@cpuc.ca.gov)>  
**Subject:** RE: PGE's Data Request Responses - Failure to Respond / Meet and Confer

Walker,

I still have not received a response to your email below. Please provide dates and times between August 13-16 that you are available for a meet and confer. If I do not hear back from you within 48 hours, I will assume that you are refusing Cal Advocates' invitation to meet and confer, and I will move forward with filing a motion to compel.

Very kind regards,

Angela

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**From:** Wuerth, Angela  
**Sent:** Wednesday, August 7, 2024 4:30 AM  
**To:** [waml@pge.com](mailto:waml@pge.com)  
**Cc:** Parkes, Christopher <[christopher.parkes@cpuc.ca.gov](mailto:christopher.parkes@cpuc.ca.gov)>; Gordon, Miles <[Miles.Gordon@cpuc.ca.gov](mailto:Miles.Gordon@cpuc.ca.gov)>  
**Subject:** PGE's Data Request Responses - Failure to Respond / Meet and Confer

Dear Walker,

Pacific Gas & Electric Company (PG&E) failed to respond to the following data requests related to PG&E's 2023 Risk Spending Accountability Report (RSAR): Data Request 1 Questions 1(e), 2(b), 3(f), 4(e), 5(d), 6(e), 7(e), 8(e), 9(e), and 10(e); Data Request 2 Questions 1(e), 2(e), 3(e), 4(e), 5(e), 6(e), 7(e), 8(e), 9(e), 10(e), and 11(e); Data Request 3 Questions 1(c), 2(c), 3(c), 4(c), 5(c), 6(i), and 7(g); and Data Request 4 Questions 1(e), 3(d), 4(g), 5(g), 6(f), 7(g), 8(e), 9(d), 10(d), and 11(d). Specifically, in its responses, PG&E objected on the basis that Cal Advocates' requests were beyond the scope of the RSAR.

Cal Advocates' statutory discovery rights are broad and derived primarily from Public Utilities Code Sections 309.5 and 314. Public Utilities Code Section 314 applies not just to Cal Advocates, but to all Commission staff. The Commission has specifically held that Cal Advocates has equally broad discovery rights as any other division of the Commission. (D.01-08-062 at 6; 10 [Finding of Fact 5].) Cal Advocates' broad discovery rights are not limited to proceedings; instead, Cal Advocates has the right to issue discovery at any time and for any purpose related to the scope of its work at the Commission. (D.01-08-062 at 7.) PG&E's objections are without merit in light of Cal Advocates' broad statutory authority.

CPUC Rules of Practice and Procedure, Rule 11.3 requires parties to meet and confer in a good faith effort to resolve the dispute before filing a motion to compel. Please provide dates and times from August 13-16 that PG&E is available to discuss its incomplete responses to these data requests.

Very kind regards,

Angela

You can read about PG&E's data privacy practices at [PGE.com/privacy](https://www.pge.com/privacy).