

Pacific Gas and Electric Company Securitization

A. 20-04-023

TURN HEARING EXHIBIT

TURN-12

PG&E WORKPAPERS – TAXABLE INCOME FORECAST

PROVIDED IN RESPONSE TO TURN DATA REQUEST 1, QUESTION 3 AND TURN DATA REQUEST 4, QUESTION 1

PACIFIC GAS AND ELECTRIC COMPANY Securitization 2020 Application 20-04-023 Data Response

PG&E Data Request No.:	TURN_001-Q01-06										
PG&E File Name:	Securitization2020_DR_	Securitization2020 DR TURN 001-Q01-06									
Request Date:	June 12, 2020	Requester DR No.:	001								
Date Sent:	July 1, 2020	Requesting Party:	The Utility Reform Network								
PG&E Witness:	Q1-Q4: David Thomason Q5: Greg Allen (Callan LLC)	Requester:	Thomas Long								

GENERAL OBJECTIONS

- 1. PG&E objects to each request to the extent it seeks information protected from disclosure by the attorney-client privilege, the attorney work-product doctrine, or any other privilege or protection from disclosure. PG&E intends to invoke all such privileges and protections, and any inadvertent disclosure of privileged or protected information shall not give rise to a waiver of any such privilege or protection.
- 2. These responses are made without waiving PG&E's rights to raise all issues regarding relevance, materiality, privilege, or admissibility in evidence in any proceeding. PG&E reserves the right, but does not obligate itself, to amend these responses as needed based on any changes to PG&E's Application or the proposed securitization structure.
- 3. PG&E incorporates each of these General Objections into each of its responses below. Each of PG&E's responses below is provided subject to and without waiver of the foregoing objections and any additional objections made below.

a. Yes, PG&E sought input from advisor banks regarding the feasibility or cost of monetizing NOLs by way of a sale or other structured transfer of the value of such tax benefits to an investor or investors. *See* 2020Securitization_DR_TURN_01-Q02_Atch01CONF; 2020Securitization_DR_TURN_01-Q02_Atch03CONF; 2020Securitization_DR_TURN_01-Q02_Atch04CONF; 2020Securitization_DR_TURN_01-Q02_Atch04CONF; and 2020Securitization_DR_TURN_01-Q02_Atch05CONF. PG&E notes that the financial forecasts contained in these documents are no longer current.

b. No, PG&E's proposal does not require or rely upon any valuation of the NOLs discounted to the time of trust formation.

c., d. Because market data and precedents for such a transaction are limited and PG&E did not market such a transaction to investors, PG&E does not have a best estimate of the range of implicit interest rates or amount of financing available under transactions of the type described in part a. above. Based on PG&E's review of information related to such potential transactions (*e.g.*, documents provided in response to part a.), the interest rate and amount of financing available were more expensive, less efficient, and less credit positive than alternative available financings and the proposed Securitization.

QUESTION 03

Please provide a live excel version of the model supporting Testimony Table 6-2: Forecast Utilization of Shareholder Tax Benefits on p. 6-9.

ANSWER 03

See 2020Securitization_DR_Misc_Chapters 3_6_7_Securitization Application_TestimonyWorkingModel_Final (1).xlsx.

QUESTION 04

Please provide a live excel version of the model supporting Testimony, Table 6-3: Illustrative Securitization Fixed Recovery Charge and Customer Credit Schedule on p. 6-13.

ANSWER 04

See 2020Securitization_DR_Misc_Chapters 3_6_7_Securitization Application_TestimonyWorkingModel_Final (1).xlsx.

QUESTION 05

On p. 6-18, PG&E states:

PACIFIC GAS AND ELECTRIC COMPANY Securitization 2020 Application 20-04-023 Data Response

PG&E Data Request No.:	TURN_004-Q01		
PG&E File Name:	Securitization2020	_DR_TURN_004-Q01	
Request Date:	August 1, 2020	Requester DR No.:	004
Date Sent:	August 7, 2020	Requesting Party:	The Utility Reform Network
PG&E Witness:	Various	Requester:	Thomas Long

QUESTION 01

Please provide updated responses to each of TURN's data requests in Sets 1, 2, and 3 based on PG&E's updated testimony.

ANSWER 01

PG&E will provide updated responses to TURN Data Request Sets 1 and 3 that reflect the updated prepared testimony that PG&E served in this proceeding on August 7, 2020. PG&E has determined that its response to TURN Data Request Set 2, served June 26, 2020, does not require an update at this time.

Forecast Taxable Income, Wildfire & POR Adjustments		2020	2021	2022	2023	2024	2025	2026
FEDERAL								
Preliminary Adjusted Utility Income Before Taxes	\$	3,047,554 \$	2,085,791 \$	1,952,773 \$	3,801,668 \$	4,239,964 \$	4,536,762 \$	4,854,335
plus: general tax adjustments	\$	(137,609) \$	(139,722) \$	(125,802) \$	(124,830) \$	(131,495) \$	(140,700) \$	(150,549)
plus: Repairs risk adj adder (including normalized portion)	\$	(226,055) \$	(228,168) \$	(214,248) \$	(213,276) \$	(219,942)		
263A MSCM adjustment adder	\$	(50,697) \$	(50,697) \$	(50,697) \$	(50,697) \$	(50,697)		
GHG	\$	139,143 \$	139,143 \$	139,143 \$	139,143 \$	139,143		
plus: Adjusted Corp Income Before Taxes	\$	12,011 \$	19,714 \$	18,820 \$	(2,486) \$	(1,404) \$	(1,404) \$	(1,404)
Consolidated Taxable Income Before Wildfire & POR Adjustments	\$	2,921,956 \$	1,965,783 \$	1,845,791 \$	3,674,352 \$	4,107,064 \$	4,394,657 \$	4,702,381
Discrete Wildfire Adjustments								
Wildfire Claims Liability Accrual	\$	(24,150,000) \$	(1,350,000)					
Insurance Recoveries	\$	2,200,000						
Wildfire Fund, Initial Contribution, Federal	\$	(320,000) \$	(320,000) \$	(320,000) \$	(320,000) \$	(320,000) \$	(320,000) \$	(320,000)
Wildfire Fund, Ongoing Contribution	\$	(192,600) \$	(192,600) \$	(192,600) \$	(192,600) \$	(192,600) \$	(192,600) \$	(192,600)
Adjustment for SCE Private Letter Ruling, Fed Only	\$	179,760 \$	166,003 \$	151,187 \$	135,137 \$	117,628 \$	98,368 \$	76,968
Discrete POR Adjustments								
Consolidated Interest Expense, excl. Securitization	\$	(1,238,277) \$	(1,467,866) \$	(1,501,416) \$	(1,570,189) \$	(1,629,489) \$	(1,716,198) \$	(1,749,131)
Securitization Interest Expense	\$	- \$	(125,863) \$	(200,726) \$	(198,913) \$	(196,659) \$	(193,130) \$	(189,537)
Customer Credit Trust Return	\$	- \$	- \$	51,515 \$	60,343 \$	49,968 \$	38,336 \$	27,234
Forecast Taxable Income, Federal	\$	(20,599,162) \$	(1,324,544) \$	(166,249) \$	1,588,130 \$	1,935,913 \$	2,109,433 \$	2,355,316
STATE								
Preliminary Adjusted Utility Income Before Taxes	\$	2,438,197 \$	1,577,292 \$	1,497,350 \$	3,129,792 \$	3,538,114 \$	3,785,782 \$	4,050,786
plus: general tax adjustments	\$	(137,609) \$	(139,722) \$	(196,916) \$	(201,989) \$	(210,546) \$	(225,284) \$	(241,054)
plus: Repairs risk adj adder (including normalized portion)	\$	(226,055) \$	(228,168) \$	(214,248) \$	(213,276) \$	(219,942)		
263A MSCM adjustment adder	\$	(50,697) \$	(50,697) \$	(50,697) \$	(50,697) \$	(50,697)		
GHG	\$	139,143 \$	139,143 \$	139,143 \$	139,143 \$	139,143		
Software	\$	- \$	- \$	(71,114) \$	(77,159) \$	(79,050)		
plus: Adjusted Corp Income Before Taxes	\$	12,011 \$	19,714 \$	18,820 \$	(2,486) \$	(1,404) \$	(1,404) \$	(1,404)
Consolidated Taxable Income Before Wildfire & POR Adjustments	\$	2,312,599 \$	1,457,285 \$	1,319,254 \$	2,925,317 \$	3,326,164 \$	3,559,093 \$	3,808,328
Discrete Wildfire Adjustments								
Wildfire Claims Liability Accrual	\$	(24,150,000) \$	(1,350,000)					
Insurance Recoveries	\$	2,200,000						
Wildfire Fund, Initial Contribution, State	\$	(4,800,000)						
Wildfire Fund, Ongoing Contribution	\$	(192,600) \$	(192,600) \$	(192,600) \$	(192,600) \$	(192,600) \$	(192,600) \$	(192,600)
Discrete POR Adjustments								
Consolidated Interest Expense, excl. Securitization	\$	(1,238,277) \$	(1,467,866) \$	(1,501,416) \$	(1,570,189) \$	(1,629,489) \$	(1,716,198) \$	(1,749,131)
Securitization Interest Expense	\$	- \$	(125,863) \$	(200,726) \$	(198,913) \$	(196,659) \$	(193,130) \$	(189,537)
Customer Credit Trust Return	\$	- \$	- \$	51,515 \$	60,343 \$	49,968 \$	38,336 \$	27,234
Forecast Taxable Income, State	Ś	(25,868,278) \$	(1,679,045) \$	(523,973) \$	1,023,957 \$	1,357,383 \$		1,704,294

Forecast Taxable Income, Wildfire & POR Adjustments	2027		2028		2029		2030	2031		2032		2033		2034
FEDERAL														
Preliminary Adjusted Utility Income Before Taxes	\$ 5,194,138	\$	5,557,728	\$	5,946,769	\$				7,015,255	\$	7,366,017	\$	7,734,318
plus: general tax adjustments	\$ (161,088)	\$	(172,364)	\$	(184,429)	\$	(197,339) ;	\$ (207,206)	\$	(217,567)	\$	(228,445)	\$	(239,867)
plus: Repairs risk adj adder (including normalized portion)														
263A MSCM adjustment adder														
GHG														
plus: Adjusted Corp Income Before Taxes	\$ (1,404)	\$	(1,404)	\$	(1,404)	\$	(1,404)	ś <i>(1,404)</i>	\$	(1,404)	\$	(1,404)	\$	(1,404)
Consolidated Taxable Income Before Wildfire & POR Adjustments	\$ 5,031,646	\$	5,383,960	\$	5,760,935	\$	6,164,299	6,472,584	\$	6,796,284	\$	7,136,168	\$	7,493,047
Discrete Wildfire Adjustments														
Wildfire Claims Liability Accrual														
Insurance Recoveries														
Wildfire Fund, Initial Contribution, Federal	\$ (320,000)	\$	(320,000)	\$	(320,000)	\$	(320,000)	\$ (320,000)	\$	(320,000)	\$	(320,000)	\$	(320,000)
Wildfire Fund, Ongoing Contribution	\$ (192,600)	\$	(192,600)	\$	(192,600)									
Adjustment for SCE Private Letter Ruling, Fed Only	\$ 52,893	\$	25,379	\$	(6,721)	\$	(199,321)	5 (199,321)	\$	(199,321)	\$	(199,321)	\$	(199,321)
Discrete POR Adjustments														
Consolidated Interest Expense, excl. Securitization	\$ (1,788,135)	\$	(1,833,640)	\$	(1,886,106)	\$	(1,967,867) \$	6 (2,065,326)	\$	(2,155,011)	\$	(2,249,252)	\$	(2,348,277)
Securitization Interest Expense	\$ (185,879)	\$	(182,153)	\$	(178,358)	\$	(173,836)	5 (168,164)	\$	(162,341)	\$	(156,366)	\$	(150,233)
Customer Credit Trust Return	\$ 25,061	\$	32,474	\$	43,753	\$	58,295 \$	5 76,728	\$	98,754	\$	123,751	\$	152,008
Forecast Taxable Income, Federal	\$ 2,622,988	\$	2,913,420	\$	3,220,903	\$	3,561,571	\$ 3,796,502	\$	4,058,364	\$	4,334,981	\$	4,627,224
STATE														
Preliminary Adjusted Utility Income Before Taxes	\$ 4,334,341	\$	4,637,745	\$	4,962,387	\$	5,309,754	5,575,242	\$	5,854,004	\$	6,146,704	\$	6,454,040
plus: general tax adjustments	\$ (257,928)	\$	(275,983)	\$	(295,301)	\$	(315,972)	5 (331,771)	\$	(348,360)	\$	(365,778)	\$	(384,066)
plus: Repairs risk adj adder (including normalized portion)														
263A MSCM adjustment adder														
GHG														
Software														
plus: Adjusted Corp Income Before Taxes	\$ (1,404)		(1,404)		(1,404)			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		(1,404)		(1,404)	- 1	(1,404)
Consolidated Taxable Income Before Wildfire & POR Adjustments	\$ 4,075,009	\$	4,360,358	Ş	4,665,682	Ş	4,992,378	5,242,067	Ş	5,504,240	Ş	5,779,523	\$	6,068,569
Discrete Wildfire Adjustments														
Wildfire Claims Liability Accrual														
Insurance Recoveries														
Wildfire Fund, Initial Contribution, State														
Wildfire Fund, Ongoing Contribution	\$ (192,600)	\$	(192,600)	Ş	(192,600)									
Discrete POR Adjustments														
Consolidated Interest Expense, excl. Securitization	\$ (1,788,135)	1.1	(1,833,640)				(1,967,867) \$		1.1	(2,155,011)	1.1	(2,249,252)	1.1	(2,348,277)
Securitization Interest Expense	\$ (185,879)		(182,153)		(178,358)					(162,341)		(156,366)	1.1	(150,233)
Customer Credit Trust Return	\$ 25,061		32,474		43,753		58,295 \$			98,754			\$	152,008
Forecast Taxable Income, State	\$ 1,933,457	Ş	2,184,440	\$	2,452,370	\$	2,908,970	\$ 3,085,305	Ş	3,285,641	Ş	3,497,656	\$	3,722,067

Forecast Taxable Income, Wildfire & POR Adjustments		2035		2036		2037		2038		2039		2040		2041
FEDERAL														
Preliminary Adjusted Utility Income Before Taxes	\$	8,121,034	\$	8,527,086	\$	8,953,440	\$	9,401,112	\$	9,871,168	\$	10,364,726	\$	10,882,963
plus: general tax adjustments	\$	(251,860)	\$	(264,453)	\$	(277,676)	\$	(291,560)	\$	(306,138)	\$	(321,445)	\$	(337,517)
plus: Repairs risk adj adder (including normalized portion)														
263A MSCM adjustment adder														
GHG														
plus: Adjusted Corp Income Before Taxes	\$	(1,404)	\$	(1,404)	\$	(1,404)	\$	(1,404)	\$	(1,404)	\$	(1,404)	\$	(1,404)
Consolidated Taxable Income Before Wildfire & POR Adjustments	\$	7,867,769	\$	8,261,228	\$	8,674,360	\$	9,108,148	\$	9,563,626	\$	10,041,877	\$	10,544,041
Discrete Wildfire Adjustments														
Wildfire Claims Liability Accrual														
Insurance Recoveries														
Wildfire Fund, Initial Contribution, Federal														
Wildfire Fund, Ongoing Contribution														
Adjustment for SCE Private Letter Ruling, Fed Only														
Discrete POR Adjustments														
Consolidated Interest Expense, excl. Securitization	\$	(2,452,331)	\$	(2,561,665)	\$	(2,676,549)	\$	(2,797,261)	\$	(2,924,096)	\$	(3,057,363)	\$	(3,197,388)
Securitization Interest Expense	\$	(143,938)	\$	(137,459)	\$	(130,442)	\$	(123,122)	\$	(115,596)	\$	(107,856)	\$	(99,897)
Customer Credit Trust Return	\$	180,630	\$	191,943	\$	184,443	\$	173,971	\$	163,202	\$	152,130	\$	140,745
Forecast Taxable Income, Federal	\$	5,452,131	\$	5,754,047	\$	6,051,812	\$	6,361,736	\$	6,687,136	\$	7,028,788	\$	7,387,501
STATE														
Preliminary Adjusted Utility Income Before Taxes	\$	6,776,742	Ś	7,115,579	\$	7,471,358	\$	7,844,926	\$	8,237,172	\$	8.649.030	Ś	9,081,482
plus: general tax adjustments	\$	(403,270)	- C.	(423,433)		(444,605)		(466,835)		(490,177)		(514,686)	1. C	(540,420)
plus: Repairs risk adj adder (including normalized portion)	<i>.</i>	(/ -/	1	(- / /	1	()/	<i>'</i>	(/ /	1	(/ /	1	(-))	<u> </u>	
263A MSCM adjustment adder														
GHG														
Software														
plus: Adjusted Corp Income Before Taxes	\$	(1,404)	\$	(1,404)		(1,404)	\$	(1,404)		(1,404)	\$	(1,404)	\$	(1,404)
Consolidated Taxable Income Before Wildfire & POR Adjustments	\$	6,372,068	\$	6,690,741	\$	7,025,348	\$	7,376,686	\$	7,745,591	\$	8,132,940	\$	8,539,658
Discrete Wildfire Adjustments														
Wildfire Claims Liability Accrual														
Insurance Recoveries														
Wildfire Fund, Initial Contribution, State														
Wildfire Fund, Ongoing Contribution														
Discrete POR Adjustments														
Consolidated Interest Expense, excl. Securitization	\$	(2,452,331)	\$	(2,561,665)	\$	(2,676,549)	\$	(2,797,261)	\$	(2,924,096)	\$	(3,057,363)	\$	(3,197,388)
Securitization Interest Expense	\$	(143,938)	\$	(137,459)	\$	(130,442)	\$	(123,122)	\$	(115,596)	\$	(107,856)	\$	(99,897)
Customer Credit Trust Return	\$	180,630	\$	191,943	\$	184,443	\$	173,971	\$	163,202	\$	152,130	\$	140,745
Forecast Taxable Income, State	\$	3,956,429	\$	4,183,560	\$	4,402,801	\$	4,630,274	\$	4,869,102	\$	5,119,851	\$	5,383,117

Forecast Taxable Income, Wildfire & POR Adjustments	2042	2043		2044	2045	2046	2047
FEDERAL							
Preliminary Adjusted Utility Income Before Taxes	\$ 11,427,111 \$	11,998,466	\$	12,598,389 \$	13,228,309 \$	13,889,724 \$	14,584,211
plus: general tax adjustments	\$ (354,393) \$	(372,113)	\$	(390,718) \$	(410,254) \$	(430,767) \$	(452,305)
plus: Repairs risk adj adder (including normalized portion)							
263A MSCM adjustment adder							
GHG							
plus: Adjusted Corp Income Before Taxes	\$ (1,404) \$	(1,404)	\$	(1,404) \$	(1,404) \$	(1,404) \$	(1,404)
Consolidated Taxable Income Before Wildfire & POR Adjustments	\$ 11,071,313 \$	11,624,949	\$	12,206,267 \$	12,816,650 \$	13,457,553 \$	14,130,501
Discrete Wildfire Adjustments							
Wildfire Claims Liability Accrual							
Insurance Recoveries							
Wildfire Fund, Initial Contribution, Federal							
Wildfire Fund, Ongoing Contribution							
Adjustment for SCE Private Letter Ruling, Fed Only							
Discrete POR Adjustments							
Consolidated Interest Expense, excl. Securitization	\$ (3,346,124) \$	(3,503,978)	\$	(3,671,377) \$	(3,848,766) \$	(4,035,001) \$	(4,230,524)
Securitization Interest Expense	\$ (91,519) \$	(82,543)	\$	(73,295) \$	(63,769) \$	(53,956) \$	(43,560)
Customer Credit Trust Return	\$ 129,038 \$	117,001	\$	104,624 \$	91,897 \$	78,811 \$	65,356
Forecast Taxable Income, Federal	\$ 7,762,708 \$	8,155,429	\$	8,566,218 \$	8,996,012 \$	9,447,407 \$	9,921,773
STATE							
Preliminary Adjusted Utility Income Before Taxes	\$ 9,535,556 \$	10,012,334	Ś	10,512,951 \$	11,038,598 \$	11,590,528 \$	12,170,054
plus: general tax adjustments	\$ (567,441) \$	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		(625,604) \$	(656,884) \$	(689,728) \$	(724,215)
plus: Repairs risk adj adder (including normalized portion)							
263A MSCM adjustment adder							
GHG							
Software							
plus: Adjusted Corp Income Before Taxes	\$ (1,404) \$			(1,404) \$	(1,404) \$	(1,404) \$	(1,404)
Consolidated Taxable Income Before Wildfire & POR Adjustments	\$ 8,966,711 \$	9,415,116	\$	9,885,942 \$	10,380,310 \$	10,899,396 \$	11,444,436
Discrete Wildfire Adjustments							
Wildfire Claims Liability Accrual							
Insurance Recoveries							
Wildfire Fund, Initial Contribution, State							
Wildfire Fund, Ongoing Contribution							
Discrete POR Adjustments							
Consolidated Interest Expense, excl. Securitization	\$ (3,346,124) \$	(3,503,978)	\$	(3,671,377) \$	(3,848,766) \$	(4,035,001) \$	(4,230,524)
Securitization Interest Expense	\$ (91,519) \$	(82,543)	\$	(73,295) \$	(63,769) \$	(53,956) \$	(43,560)
Customer Credit Trust Return	\$ 129,038 \$	117,001	\$	104,624 \$	91,897 \$	78,811 \$	65,356
Forecast Taxable Income, State	\$ 5,658,105 \$	5,945,596	\$	6,245,894 \$	6,559,671 \$	6,889,250 \$	7,235,707