

PACIFIC GAS AND ELECTRIC COMPANY
Transmission Owner Tariff (TO21)
FERC Docket Nos. ER24-96-000, et. al.
Data Response

PG&E Data Request No.:	CPUC-PGE-06
PG&E File Name:	FERC-TO21_AU_CPUC-PGE_06-Q152
Request Date:	September 26, 2024
Requesting Party:	California Public Utilities Commission
Response Date:	November 13, 2024
PG&E Respondent(s):	Chausse Chase, Dipo Toriola, and George Kataoka

QUESTION CPUC-PGE-152

Idle Line Removal

Please provide an update on PG&E’s progress in removing idle lines under the \$85 million disallowance goal, including:

- a. Total number of lines removed to date and associated costs, by month in 2024
- b. Total number of lines projected for removal and associated costs, during remainder of 2024
- c. Impacts on the rate year revenue requirement

And a table of:

- d. Dates on which PG&E identified individual lines for removal
- e. Dates on which PG&E began the permitting processes for removal of the above lines
- f. Completion dates (or expected completion dates, if incomplete) for above removal activities

ANSWER CPUC-PGE-152

PG&E provides a semi-annual report on removing permanently abandoned idle transmission lines to the CPUC Safety and Enforcement Division. The most recent report was delivered October 2024 and provides information on lines removed, associated actual costs, forecasted costs and status of the \$85 million disallowance.

- a. See FERC-TO21-IR-CPUC-PGE-06-AU.152_Atch01 and FERC-TO21-IR-CPUC-PGE-06-AU.152_Atch02.
- b. See FERC-TO21-IR-CPUC-PGE-06-AU.152_Atch01 and FERC-TO21-IR-CPUC-PGE-06-AU.152_Atch02.
- c. The \$85 million of non-recoverable removal costs are not included in the TO21 transmission revenue requirement. These costs are recorded to below the line expense funded by PG&E shareholders rather than as a decrease to accumulated depreciation as removal costs would normally be recorded.

- d. PG&E provided the CPUC Safety and Enforcement Division with the listing of permanently abandoned transmission lines to remove in April 2022.
- e. For all the projects in the transmission idle line removal program, the CPUC Permit Status is Exempt. These projects fall under t-line maintenance or minor alteration activity and are not subject to GO 131-D NOC, PTC or CPCN requirements.
- f. See FERC-TO21-IR-CPUC-PGE-06-AU.152_Atch01 and FERC-TO21-IR-CPUC-PGE-06-AU.152_Atch02.

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PG&E Data Request No.:	CPUC-PGE-06
PG&E File Name:	FERC-TO21_AU_CPUC-PGE_06-Q153
Request Date:	September 26, 2024
Requesting Party:	California Public Utilities Commission
Response Date:	October 28, 2024
PG&E Respondent(s):	Moshreq Sobhy

QUESTION CPUC-PGE-153

In “Order on Formula Rate Informational Filing and Establishing Hearing and Settlement Judge Procedures,” 189 FERC 61,021, at pages 9 to 13, Ordering Paragraphs 36 to 38, FERC agreed that:

PG&E’s capitalization of its Reliability ROW Expansion Program costs is not consistent with the Commission’s accounting regulations. Accordingly, we direct PG&E to remove these costs from rate base, and as discussed below, record these costs as utility O&M Expenses.

Please explain whether PG&E will reflect RY 2022 adjustments to implement this Order in its December 1, 2024, RY2025 Annual Update.

ANSWER CPUC-PGE-153

Yes. PG&E will reflect the RY2022 adjustments resulting from the FERC Order in its December 2, 2024, RY2025 Annual Update filing with FERC.

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PG&E Data Request No.:	CPUC-PGE-06
PG&E File Name:	FERC-TO21_AU_CPUC-PGE_06-Q154
Request Date:	September 26, 2024
Requesting Party:	California Public Utilities Commission
Response Date:	October 28, 2024
PG&E Respondent(s):	Moshreq Sobhy

QUESTION CPUC-PGE-154

“Order on Formula Rate Informational Filing and Establishing Hearing and Settlement Judge Procedures,” 189 FERC ¶ 61,021, addressed PG&E’s TO Tariff for Rate Year 2022, please explain whether PG&E will reflect adjustments to vegetation management ROW Expansion costs for Rate Years 2023, 2024, and 2025 in its December 1, 2024 RY2025 Annual Update. If yes, please explain the how the adjustment(s) will be implemented in the RY2025 Annual Update.

ANSWER CPUC-PGE-154

PG&E will reflect adjustments to vegetation management ROW Expansion costs for Rate Years 2023, 2024, and 2025 in its December 2, 2024 RY2025 Annual Update. PG&E is currently evaluating how the adjustments will be implemented and reflected in the RY2025 Annual Update filing.

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PG&E Data Request No.:	CPUC-PGE-06
PG&E File Name:	FERC-TO21_AU_CPUC-PGE_06-Q155
Request Date:	September 26, 2024
Requesting Party:	California Public Utilities Commission
Response Date:	October 28, 2024
PG&E Respondent(s):	Moshreq Sobhy

QUESTION CPUC-PGE-155

In PG&E’s Response to ED-001-Q028(a) in the TPR Process, PG&E indicated that the table of planning orders included in the data request “does include all of the POs to which PG&E records costs associated with expanding the vegetation clearance on existing rights of way.” For each PO referenced in that data request, please provide the capital additions by year for each PO since it was created. To the extent additional POs were created in 2017 or 2018, please include those POs and associated amounts.

ANSWER CPUC-PGE-155

As stated in response to information requests CPUC-PGE-153 and CPUC-PGE-154, PG&E will reflect the adjustments required by *Pacific Gas and Electric Company*, 189 FERC ¶ 61,021 (2024) regarding the capitalization of its Reliability ROW Expansion Program costs in the true-up adjustment of the Formula Rate in the RY2025 Annual Update filing of December 2, 2024. Upon the RY2025 Annual Update filing, PG&E will provide supporting workpapers to the CPUC and other interested parties to explain the calculation of the adjustment.

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PG&E File Name:	FERC-TO21_AU_CPUC-PGE_06-Q156
Request Date:	September 26, 2024
Requesting Party:	California Public Utilities Commission
Response Date:	October 30, 2024
PG&E Respondent(s):	Ivana Tamburrino, Charles Middlekauff, George Kataoka, and Nalini Webster

QUESTION CPUC-PGE-156

Referring to WP_19-AandG-1, line 618, PG&E described an adjustment of \$385,454 to Account 925 as:

Reclassify Grizzly Tap Line Repair Third Party Claims costs to FERC account 925 from the following FERC accounts:

- (1) 920 \$106,276; and
- (2) 571 \$279,178

The City of Santa Clara d.b.a Silicon Valley Power (SVP) owns the Grizzly Tap Line. As a result of the Dixie Fire, the Grizzly Tap Line was damaged. To resolve a dispute of claims between PG&E and SVP a Settlement Agreement was executed, and approved by the Bankruptcy Court on January 4, 2023. Pursuant to the Settlement Agreement PG&E will bear a portion of the Grizzly Tap Line Repair costs up to \$7.5M. This expense work is recorded to FERC account 925 as a Third Party Claims cost.

- a. Please provide the Settlement Agreement described.
- b. Was PG&E found to be at fault in this Agreement?
- c. Did PG&E book costs to transmission plant accounts as their portion of bearing the Grizzly Tap Line Repair costs on the Grizzly Tap Line? If so, please provide the amounts by FERC Account and by year that PG&E booked to any transmission plant accounts.
- d. Did PG&E book costs to transmission O&M accounts as their portion of bearing the Grizzly Tap Line Repair costs on the Grizzly Tap Line? If so, please provide the amounts by FERC Account and by year that PG&E booked to any transmission O&M accounts.

ANSWER CPUC-PGE-156

- a. A copy of the Settlement Agreement is included as FERC-TO21_AU_CPUC-PGE_06-Q156Atch_01
- b. Section 3 of the Settlement Agreement provides: “The Parties agree and acknowledge that this Agreement is the result of a compromise and shall not be construed as an admission of

any liability, wrongdoing, or responsibility on their parts or on the parts of their predecessors, successors, parents, direct subsidiaries, indirect subsidiaries, affiliates, assigns, agents, their current and former directors, officers, employees, representatives, insurers, attorneys, and shareholders. The Parties expressly deny any such liability.”

- c. No, PG&E did not book the associated Grizzly Tap Line Repair costs to transmission FERC Plant accounts.
- d. Grizzly Tap expenses booked to transmission O&M accounts have been adjusted out to A&G.

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Response Date:	October 30, 2024
PG&E Respondent(s):	Ivana Tamburrino

QUESTION CPUC-PGE-157

Referring to the response to NCPA-PGE-1.17Atch04, lines 75-160, the amounts in Excel column S total approximately \$7.2 million. These items are labeled as the Third Party Claims - Grizzly Tap in Excel column Y.

- a. Please explain why these costs should be paid by ratepayers.
- b. Please describe what accounts these costs were previously booked, if applicable, by account and by amount.

ANSWER CPUC-PGE-157

- a. The settlement between PG&E and the City of Santa Clara dba Silicon Valley Power (SVP) was approved by the Bankruptcy Court on January 4, 2023. Third-party claims settlements are recorded to FERC Account 925 and included in the TO21 RY2025 filing, consistent with the TO21 Formula Rate Model.
- b. Please refer to the Table below for the year 2023 Grizzly Tap claims costs FERC accounting:

	FERC Accounts		
	571	920	925
Recorded 2023 Claims Costs	279,178	106,276	6,800,706
Reclassification from 571 to 925	(279,178)		279,178
Reclassification from 920 to 925		(106,276)	106,276
Recorded Adjusted incl in TO21 RY2025 filing	-	-	7,186,160