

PACIFIC GAS AND ELECTRIC COMPANY
Transmission Owner Tariff (TO21)
FERC Docket No. ER24-96-000, et al.
Data Response

PG&E Information Request No.:	CPUC-PGE-AU.01		
PG&E File Name:	FERC-TO21-IR-CPUC-PGE-01-AU.01		
Request Date:	July 3, 2024	Response Date:	July 17, 2024
Requesting Party	CPUC	PG&E Respondent:	Scott Toback, George Kataoka

QUESTION CPUC-PGE-AU.01

Regarding WP-9-PlantAdditions spreadsheet:

- a) What if any corrections, updates, or revisions is PG&E aware of or has PG&E “identified” since the June 14 release of the Draft TO21 RY2025 WP-9-PlantAdditions file providing calendar year 2024 and 2025 recorded and forecasted data? If data has changed, please provide an electronic copy of the impacted spreadsheets to that WP-9.
- b) For 2024 monthly data, which months reflect Recorded or Actual (as opposed to forecasted) dollar amounts for Tab 1 through 6

ANSWER CPUC-PGE-AU.01

- a) PG&E is not aware of nor has “identified” any corrections, updates, or revisions to the Draft TO21-RY2025 WP_9-PlantAdditions workpaper. Project and program forecasts are dynamic, however WP_9-PlantAdditions represents the forecast as of the time data was pulled for the Annual Update posting in June 2024, and PG&E has not undertaken any efforts to reforecast for RY2025 since that time.
- b) For 2024 monthly data, January and February reflect recorded amounts for the Capital Expenditures forecast in Tab 1. PG&E pulled the data used in the Capital Expenditures forecast on March 11, 2024, in alignment with the Transmission Project Review (TPR) Process. The monthly amounts reflected in Tabs 2 through 6 are all forecasted amounts and are derived from the Capital Expenditures amounts in Tab 1.

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PG&E Information Request No.:	CPUC-PGE-AU.02		
PG&E File Name:	FERC-TO21-IR-CPUC-PGE-01-AU.02		
Request Date:	July 3, 2024	Response Date:	July 17, 2024
Requesting Party	CPUC	PG&E Respondent:	George Kataoka/ Scott Toback

QUESTION CPUC-PGE-AU.02

Regarding WP-9-PlantAdditions, TAB 5:

- a) Please provide a walk through, on the spreadsheet, of how PG&E derived the values reported in the TO21 RY2025 Transmission Formula Annual Update TAB 9-Plant-Additions Column 1, for the Months of December 2024 and December 2025.
- b) Please explain how PG&E included individual OAI amounts in Annual Update TAB 9-Plant-Additions Column 1.
- c) Please explain how PG&E has reflected monthly AFUDC dollars in the monthly data in Annual Update TAB 9-Plant-Additions Column 1.
- d) Has PG&E provided a supporting workpaper for the TO21 Annual Update Formula Model the input to which includes forecasted 2024 or 2025 AFUDC dollars, by Planning Order?

ANSWER CPUC-PGE-AU.02

- a) PG&E will provide a walk through during the upcoming TO21-RY2025 Annual Update Technical Conference call on July 15, 2024. Refer to slide 27 from the PowerPoint presentation file from the Technical Conference. Forecasted Gross Plant Additions are largely driven by Planned Operative Dates for each Planning Order and the Forecast Capital Expenditures in those specific months (i.e., December 2024 and December 2025) in WP_9-PlantAdditions.
- b) Column 1 from Schedule 9 (9-PlantAdditions) from the TO21-RY2025 Formula Model is for Network Transmission monthly forecasted total Gross Plant Additions. The amounts and timing of Gross Plant Additions for each individual Planning Order are derived from WP_9-PlantAdditions. For Planning Orders with an Operative Date of OAI (refer to Excel column E in Tab 1 of WP_9-PlantAdditions), forecast capital expenditures, less any forecast Cost of Removal Spend, are transferred to Plant as Gross Plant Additions in the same month the costs are forecasted.
- c) Forecast AFUDC for each Planning Order, if any, is included as Gross Plant Additions upon becoming operative. Column 1 (for Gross Plant Additions) from Schedule 9 (9-PlantAdditions) from the TO21-RY2025 Formula Model is derived from recorded CWIP balances and forecasted capital expenditures. Forecasted Capital Expenditures, as presented in WP_9-PlantAdditions, represent total financial costs, including AFUDC.

AFUDC is only included for Planning Orders that have a planned construction period equal to or greater than 30 calendar days.

- d) No, PG&E does not create an additional workpaper for forecasted AFUDC by Planning Order. However, PG&E provides a supporting workpaper (refer to 'Draft WP_AFUDC_TO21_RY2025'), which details applicable FERC Waivers applied to the AFUDC rates, computation of the monthly AFUDC Rate, and the calculation for average short-term debt applied (if applicable). Additionally, PG&E provides detail of how AFUDC is applied within forecast Capital Expenditures (refer to Exhibit PGE-0012 Testimony for Rate Base and Depreciation Expense).

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PG&E File Name:	FERC-TO21-IR-CPUC-PGE-01-AU.03		
Request Date:	July 3, 2024	Response Date:	July 17, 2024
Requesting Party	CPUC	PG&E Respondent:	George Kataoka/ Scott Toback

QUESTION CPUC-PGE-AU.03

Regarding WP-9-PlantAdditions, TAB 3, focusing on: Operative Date data identified as “OAI” with Funding ID “TOO”.

- a) Please explain the criteria and engineering basis that determine that a Transmission Net Capital Expenditure should be identified as a Funding ID “TOO” for 2024 and 2025.
- b) Please confirm the subtotal of \$377,201,063 for 2024 and subtotal of \$301,241,746 for 2025.

ANSWER CPUC-PGE-AU.03

- a) PG&E described the methodology used for voltage classifications in TO21 Prepared Testimony, Exhibit PGE-0011, pp. 6-7, filed October 13, 2023 at FERC. The Funding ID classifications are as follows:
 - **Transmission Owner High Voltage (TOHI)** projects consisting of facilities operating at voltage levels equal to or greater than 200 kilovolts (kV);¹
 - **Transmission Owner Low Voltage (TOLO)** projects consisting of facilities operating at voltage levels of less than 200 kV; and
 - **Transmission Owner Other (TOO)** projects consisting of both TOHI and TOLO facilities (i.e., shared).
- b) Yes, the identified amounts are the Net Capital Expenditures subtotals for Planning Orders with both “OAI” Operate Dates and the “TOO” Funding ID.

¹ Includes associated project components such as protective relaying and communications equipment used to support network facilities operating within the indicated voltage range.

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PG&E Information Request No.:	CPUC-PGE-AU.04		
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Request Date:	July 3, 2024	Response Date:	July 17, 2024
Requesting Party	CPUC	PG&E Respondent:	George Kataoka/ Scott Toback

QUESTION CPUC-PGE-AU.04

Regarding WP-9-PlantAdditions, TAB 3, Focusing on: Operative Date data identified as “OAI” with Funding ID “TOLO” Planning Order:

Planning Order	Planning Order Description	Total 2024	Total 2025
5552619	Merced#1 70kV - Caltrans Pole Relo	\$767,543	(\$175,737)

- a) Please explain why in 2025 the dollar value is negative.

ANSWER CPUC-PGE-AU.04

- a) The negative amount represents a billing credit on the Merced #1 project. The liability determination on this project is 25% at the client’s expense. Most of the work on this project was forecast to be completed in Q4 of 2024, thus the billing credit is shown in early 2025.

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Requesting Party	CPUC	PG&E Respondent:	Nick Medina/ Scott Toback

QUESTION CPUC-PGE-AU.05

Regarding WP-9-PlantAdditions, TAB 3, Focusing on: Operative Date data identified as “OAI” with Funding ID “TOO” Planning Order:

Planning Order	Planning Order Description	Total 2024	Total 2025
5542459	Corrosion Control MWC93	\$19,541,486	\$50,372,892

- a) Please explain why in 2025 the value increased to \$50,372,892.
- b) How many circuits will be worked on in 2024? In 2025?
- c) Please provide a detailed breakdown of dollars allocated to PG&E internal labor vs Contracted labor to perform this work.

ANSWER CPUC-PGE-AU.05

- a. Please refer to TPR-Process_DR_ED_001-Q029 subpart E. PO 5542459 is for the corrosion control program including tower coating and cathodic protection work, and this planning order is not exclusively for tower coating. The 2025 investment plan is currently being developed. The program is not expecting a significant increase in scope for 2025.
- b. Please refer to TPR-Process_DR_ED_001-Q029 and TPR-Process_DR_ED_001-Q030 for the 2024/2025 workplan under PO 5542459 Corrosion Control MWC 93.
- c. For 2024 the PG&E internal labor is \$4.9M and Contracted Labor is \$10.1M and the program is evaluating the workplan for the remainder of the year. For 2025 workplans are still under development in the investment planning process, PG&E internal labor vs. contracted labor data is not available.

NPACIFIC GAS AND ELECTRIC COMPANY
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Requesting Party	CPUC	PG&E Respondent:	Justin Napper

QUESTION CPUC-PGE-AU.06

Regarding WP-9-PlantAdditions, TAB 3, Focusing on: Operative Date data identified as “OAI” with Funding ID “TOHI” Planning Order:

Planning Order	Planning Order Description	Total 2024	Total 2025
5529947	Veg Mgt Reliability -2023 Circuits	\$25,229,069	\$28,451,393

- a) Please explain how PG&E anticipates completing the above work in 2024 and 2025, when in 2021 and 2022, as indicated below, significantly lower levels were forecasted.

Planning Order	Planning Order Description	Total 2024	Total 2025
5529945	Veg Mgt Reliability -2021 Circuits	\$51,228	\$0
5529946	Veg Mgt Reliability -2022 Circuits	\$1,612,865	\$0

- b) Does PG&E have a more detailed breakdown of dollars that are PG&E internal labor vs. Contracted labor to perform this work? If so, please provide this breakdown.

ANSWER CPUC-PGE-AU.06

- a) The amounts shown represent the forecasts for 2024 and 2025. The forecasts for the 2021/2022 circuit planning orders are lower because most of the work was completed in prior years.
- b) Please see the following table which provides a breakdown of internal vs. contract costs to perform the referenced work. Breakdown provides historical data for 2021-2023, and 2024 YTD data.

	2021		2022		2023		2024	
	Cost	%	Cost	%	Cost	%	Cost	%
Contract	35,962,937	98.0%	34,182,443	96.7%	24,601,657	95.9%	6,082,860	87.9%
Internal	719,521	2.0%	1,181,244	3.3%	1,059,739	4.1%	835,864	12.1%
Total	36,682,458		35,363,687		25,661,395		6,918,724	