

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

PG&E Information Request No.:	NCPA-PGE-1.1		
PG&E File Name:	FERC-TO21_AU_NCPA-PGE_01-1.1		
Request Date:	August 7, 2024	Response Date:	October 7, 2024
Requesting Party	Northern California Power Agency	PG&E Respondent:	PG&E

**QUESTION NCPA-PGE-1.1**

Please provide a list of all transmission projects placed in service in 2023 for which incentive rate treatment was requested in accordance with Order No. 679. For each such project, please include:

- a. The docket under which incentive rate treatment was requested by PG&E,
- b. A description of the project(s) for which incentive rate treatment was requested,
- c. A description of the incentive rate treatment requested, and
- d. An explanation of how any allowed incentive rate treatment is reflected in the RY2025 formula rate.

**ANSWER NCPA-PGE-1.1**

PG&E objects to this request as vague and ambiguous. PG&E understands that “placed in service” means a project that commenced operations in 2023. Because abandoned plant is not placed into service, PG&E is not including abandoned plant incentives in this response. In addition, PG&E notes that it was recently granted a CWIP incentive for certain projects by FERC, but those projects were not “placed in service” in 2023. With these clarifications, PG&E was entitled to the RTO participation incentive in 2023 for all projects that are subject to the TO Tariff. PG&E included the RTO participation adder in its TO21 rate case filing. In December 2023, FERC accepted the TO21 Formula Rate filing but indicated that PG&E was not eligible for the RTO participation adder. FERC denied PG&E’s rehearing request on this issue and the matter is now pending in the Ninth Circuit Court of Appeals. If the Court of Appeals agrees with PG&E, the RTO participation adder would apply to all projects that were “placed in service” in 2023.

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PG&E Information Request No.:	NCPA-PGE-1.9		
PG&E File Name:	FERC-TO21_AU_NCPA-PGE_01-1.9		
Request Date:	August 7, 2024	Response Date:	October 23, 2024
Requesting Party	Northern California Power Agency	PG&E Respondent:	George Kataoka and Scott Toback

**QUESTION NCPA-PGE-1.9**

Please provide a list of all Contributions in Aid of Construction (CIAC) or cost reimbursements associated with transmission projects placed in service during 2023 (including CIAC’s and reimbursements received after 2023 associated with facilities placed in service in 2023), by facility for which CIAC was made, and provide the following information:

- a. The facility or facilities for which the CIAC or cost reimbursement was made.
- b. The amount of the CIAC or cost reimbursement.
- c. The date on which the CIAC or cost reimbursement was received by PG&E
- d. An explanation of how the CIAC or cost reimbursement was reflected in the calculation of RY2025.

**ANSWER NCPA-PGE-1.9**

PG&E understands contributions in aid of construction (CIAC) to be contributions paid to PG&E by a third party which are not reimbursed by PG&E after commercial operation is reached, such as is the case with Direct Assigned projects. PG&E is also involved with Network Upgrade projects, where third party payments are reimbursed.

Network Upgrade and Direct Assigned projects are further described as follows:

Direct Assignment Projects: When PG&E receives contributions from applicants to construct assets that will be used for a specific purpose and solely for the applicant’s use (typically in the case of connecting third-party generation facilities to the PG&E network), the CIAC is credited to the capital order. Direct assignment facilities and third-party generation interconnections are not included in TO rate base.

Network Upgrades: When PG&E receives advances from applicants to construct assets which upgrade the transmission network and provide general benefits to PG&E customers (e.g., to handle increased capacity from new generation), the customer advances are not credited against the capital order, but instead recorded as a customer advance liability. Refundable customer advances reduce rate base while the cash is with PG&E. As the customer advance is returned to the customer (based on the terms and conditions of the contract), there is a corresponding increase in rate base. Network Upgrade facilities are included in TO rate base.

Because cost reimbursements are only paid to customers by PG&E on Network Upgrade projects, and because Direct Assigned projects are not included in TO rate base, the following response is focused on Network Upgrade projects.

- a. See a copy of Draft WP\_15-NUC, included as Attachment FERC-TO21\_AU\_NCPA-PGE\_01-1.09Atch01.xlsx, columns JAN 2023 through DEC 2023. This attachment shows for 2023 where customer deposits were received (Column I), and where PG&E processed reimbursements to the customer (Columns Q through T). Column D can be filtered for Online Date.
- b. See response to Subpart a.
- c. PG&E receives customer credits on Network Upgrade projects throughout the project lifecycle. Once the project closes, PG&E is responsible for reimbursing those credits with interest over a specified period of time subject to the customer agreement. For the list of projects in Attachment FERC-TO21\_AU\_NCPA-PGE\_01-1.09Atch01.xlsx, the Total Remaining Balance in Column W is the amount that PG&E is responsible for reimbursing at the end of each month.
- d. See description of Network Upgrades above for an explanation for how the reimbursements are reflected in RY2025.

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PG&E Information Request No.:	NCPA-PGE-1.10		
PG&E File Name:	FERC-TO21_AU_NCPA-PGE_01-1.10		
Request Date:	August 7, 2024	Response Date:	October 23, 2024
Requesting Party	Northern California Power Agency	PG&E Respondent:	George Kataoka, Scott Toback

**QUESTION NCPA-PGE-1.10**

Please provide a list of all 2023 transmission plant additions for which a CIAC or cost reimbursement is anticipated by PG&E but not yet received, by facility for which the CIAC or reimbursement is expected, and provide the following information:

- a. The facility or facilities for which the CIAC or cost reimbursement is anticipated,
- b. The amount of anticipated CIAC or cost reimbursement, and
- c. An explanation of whether the CIAC or cost reimbursement has been reflected as a credit within the calculation of RY2025.

**ANSWER NCPA-PGE-1.10**

- a. See response to NCPA-PGE-1.9. For all projects in Attachment FERC-TO21\_AU\_NCPA-PGE\_01-1.9\_Atch01.xlsx with an online date in 2023, PG&E anticipates a reimbursement to the customer of the total remaining project balance.
- b. See response to subpart a.
- c. For Network Upgrade projects as presented in WP 15-NUC, the amounts are reported on a recorded basis from PG&E's FERC Form 1 and are trued-up in each TO21 Annual Update, including any changes to the balance, which can be an increase or decrease in amount each year based on advances received and reimbursed.

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PG&E Information Request No.:	NCPA-PGE-1.11		
PG&E File Name:	FERC-TO21_AU_NCPA-PGE_01-1.11		
Request Date:	August 7, 2024	Response Date:	October 7, 2024
Requesting Party	Northern California Power Agency	PG&E Respondent:	George Kataoka, Scott Toback

**QUESTION NCPA-PGE-1.11**

Please provide a list of all CIACs or cost reimbursements associated with transmission projects projected to be placed in service in 2024 and 2025, by facility for which the CIAC or reimbursement was made, and provide the following information:

- a. The facility or facilities for which the CIAC or cost reimbursement was made.
- b. The amount of the CIAC or cost reimbursement.
- c. The date on which the CIAC or cost reimbursement was received by PG&E
- d. An explanation of how the CIAC was reflected in the plant forecast within RY2025.

**OBJECTION TO NCPA-PGE-1.11**

PG&E objects to this information request as it is out of scope for TO21-RY2025. Customer reimbursed projects, including recorded Construction Work in Progress (CWIP), forecasted capital expenditures, and forecasted credits, are excluded from WP\_9-PlantAdditions and Schedule 9-PlantAdditions.

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PG&E Information Request No.:	NCPA-PGE-1.12		
PG&E File Name:	FERC-TO21_AU_NCPA-PGE_01-1.12		
Request Date:	August 7, 2024	Response Date:	October 7, 2024
Requesting Party	Northern California Power Agency	PG&E Respondent:	George Kataoka, Scott Toback

**QUESTION NCPA-PGE-1.12**

Please provide a list of all 2024 and 2025 projected transmission plant additions for which a CIAC or cost reimbursement is anticipated by PG&E but not yet received, by facility for which the CIAC or reimbursement is expected, and provide the following information:

- a. The facility or facilities for which the CIAC or cost reimbursement is anticipated,
- b. The amount of anticipated CIAC or cost reimbursement, and
- c. An explanation of whether the CIAC or cost reimbursement has been reflected as a credit within the calculation of RY2025.

**OBJECTION TO NCPA-PGE-1.12**

PG&E objects to this information request as it is out of scope for TO21-RY2025. Customer reimbursed projects, including recorded Construction Work in Progress (CWIP), forecasted capital expenditures, and forecasted credits, are excluded from WP\_9-PlantAdditions and Schedule 9-PlantAdditions.