

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6162E
As of May 7, 2021

Subject: Annual Advice Letter for the Disbursement of Funds from the Humboldt Bay Power Plant Unit 3 Nuclear Decommissioning Trusts

Division Assigned: Energy

Date Filed: 04-15-2021

Date to Calendar: 04-19-2021

Authorizing Documents: D1107003

Disposition:	Accepted
Effective Date:	05-15-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

415-973-4587

PGETariffs@pge.com

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

April 15, 2021

Advice 6162-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Annual Advice Letter for the Disbursement of Funds from the Humboldt Bay Power Plant Unit 3 Nuclear Decommissioning Trusts
(Information only– no additional disbursement approval requested)

Purpose

Pacific Gas and Electric Company (PG&E) hereby submits its updated request for authorization to make disbursements from the Humboldt Bay Unit 3 Nuclear Decommissioning Master Trusts (Trusts) to fund decommissioning activities at Humboldt Bay Power Plant Unit 3 (HBPP Unit 3). PG&E's authorized funding coupled with the reduction in 2020 expenditures results in adequate funding for 2021 planned expenditures¹. As a result, PG&E is not requesting the disbursement of funds for planned decommissioning expenditures in 2021. The total planned expenditure for 2021 is \$14.0 million (in nominal dollars).

PG&E is collecting revenues to fund the Trusts and drawing upon the Trusts for these activities will not increase any rate of charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

Background

HBPP Unit 3 is a 65 megawatt boiling water reactor that began commercial operation in 1963, ceased operation in 1976, and was placed in the SAFSTOR custodial mode in 1988 to await final decommissioning. In Decision (D.) 03-10-014, the California Public Utilities Commission (CPUC or the Commission) approved a decommissioning plan for HBPP Unit 3.

The Trusts were established in D.85-12-022 to allow PG&E "to recover from its ratepayers the cost of decommissioning the prudently constructed plant at Humboldt Bay Power

¹ Advice 5806-E in 2020 authorized funding of \$24.6 million; prior authorized underspend totaled \$35.6 million and 2020 actual expenditures totaled \$16.3 million, resulting in \$19.3 million remaining unspent in 2020.

Plant Unit 3.” Funds for the Trusts were collected from PG&E’s ratepayers from 1988 through 1991 pursuant to D.85-12-022; from 2003 through 2013 pursuant to D.03-20-014, D.07-01-003 and D.10-07-009; from 2014 through 2016 pursuant to D.14-02-024 and D.14-12-082; and from 2017 through 2019 pursuant to D.17-05-020.

The Commission most recently approved a decommissioning cost estimate for HBPP Unit 3 of \$1.055 billion (nominal/2014 \$) in PG&E’s 2015 Nuclear Decommissioning Cost Triennial Proceeding (NDCTP), D.17-05-020 issued on May 25, 2017. PG&E filed its 2018 NDCTP Application (A.) 18-12-008 on December 13, 2018 updating the decommissioning cost estimate for HBPP Unit 3; that application is pending Commission approval.

In D.11-07-003 the Commission reaffirmed its previous determination that PG&E seek specific Trust disbursements through advice letter filings,² and specified information to be included in future advice letters.³ That decision also requires PG&E to submit an advice letter at least once every calendar year.⁴ D.14-02-024 specified additional information to be provided when seeking Trust disbursement authorizations.⁵ PG&E’s compliance Advice Letter 4379-E providing the revised reporting format was effective March 21, 2014.

As of December 31, 2020, the Trusts had a market value of \$170.1 million, a liquidation value of \$161.0 million, and an expense equivalent liquidated value of \$161.3 million.⁶

Present Request

All the \$14.0 million projected 2021 expenditure in this request is for amounts and activities included and approved in the 2015 NDCTP:

² See Resolution E-4268.

³ D.11-07-003, Attachment B.

⁴ D.11-07-003, Ordering Paragraph 3.

⁵ D.14-02-024, Ordering Paragraph 2.

⁶ The liquidation value of the Trusts reflects the amount available, after taxes, to pay for nuclear decommissioning projects.

Major Cost Category	Amount Requested for 2021
General Staffing (Excludes Caisson)	\$2.6 million
Remainder of Plant Systems	\$0.0 million
Specific Project Costs (Excludes Disposal/Caisson/Canal)	\$0.0 million
Waste Disposal (Excludes Caisson/Canal)	\$0.0 million
Small Value Contracts	\$1.3 million
Spent Fuel Management	\$10.0 million
Caisson Removal	\$0.0 million
Canal Remediation	\$0.0 million
Common Site Support Caisson and Canals	\$0.1 million
EPC Services	\$0.0 million

D.11-07-003 authorized PG&E to obtain reimbursement from the Trusts for amounts up to the total amount authorized in an advice letter, i.e., PG&E may withdraw funds for a particular activity in excess of the annual request for that activity so long as the total disbursements are within the advice letter authorization. Any variances are identified in the next advice letter.⁷ PG&E's projected expenditures for 2020 as authorized in Advice Letter 5806-E totaled \$24.6 million; the actual amount spent was \$16.3 million. Within that amount, expenditures for Spent Fuel Management were \$5.3 million less than the expenditures projected in the Advice Letter. The other decommissioning activities during 2020 made up the remaining \$3.0 million.⁸

The activities for which PG&E seeks Trust disbursements are distinct from the operations and maintenance activities previously performed under SAFSTOR and, consistent with prior Commission decisions, PG&E is not requesting any funding for SAFSTOR through this Advice Letter. The SAFSTOR budget and work scope ended in 2019.

In accordance with D.11-07-003 and D.14-02-024, PG&E is providing the following additional information:

Attachment 1 – Graph Tracking Total NDCTP Forecast and Actual Decommissioning Expenditures

Attachment 2 – Description of Categories of Work and Reference to Decommissioning Project Report

Attachment 3 – Spreadsheet Identifying Actual and Forecast Expenditures by Cost Category and Current Authorization Request

Attachment 4 – Comparison of Actual to Forecast Annual Cash Flow

⁷ D.11-07-003, Attachment B.

⁸ Values may not sum due to rounding.

Attachment 5 – Comparison of Actual to Forecast Project Schedule

Attachment 6 – Decommissioning Projects Expenditures Pending Reasonableness Review

Attachment 7 – Comparison of Amounts Previously Requested for Each Activity versus Total Amount Spent

The information in these attachments is based on the currently authorized amounts from the 2015 NDCTP.

As with previously approved disbursements from the Trusts, PG&E will maintain separate accounting to record costs of these activities, and the related transactions with the Trusts, to permit cost monitoring. In accordance with Ordering Paragraph 2 of Resolution E-4268, PG&E will seek disbursement from the Trusts for activities granted herein only after PG&E has incurred and paid the costs for the activities, or through the advance withdrawal procedures authorized in Section 2.01(5) of the Trusts. To date, PG&E has not utilized these advance procedures; instead, on a periodic basis, PG&E requests withdrawals from the Trusts of the costs of internal services and vendors actually paid.

Actual expenditures will be reviewed after completion of specific projects in subsequent NDCTPs.

Protests

*****Due to the COVID-19 pandemic and the shelter at home orders, PG&E is currently unable to receive protests or comments to this advice letter via U.S. mail or fax. Please submit protests or comments to this advice letter to EDTariffUnit@cpuc.ca.gov and PGETariffs@pge.com*****

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than May 5, 2021, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

PG&E requests that this Tier 2 advice submittal become effective on regular notice, May 15, 2021, which is 30 calendar days after the date of submittal.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for A.16-03-006 and A. 18-12-008. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

_____/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List A.16-03-006 and A.18-12-008



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: Kimberly.Loo@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 6162-E

Tier Designation: 2

Subject of AL: Annual Advice Letter for the Disbursement of Funds from the Humboldt Bay Power Plant Unit 3 Nuclear Decommissioning Trusts

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.11-07-003

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 5/15/21

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

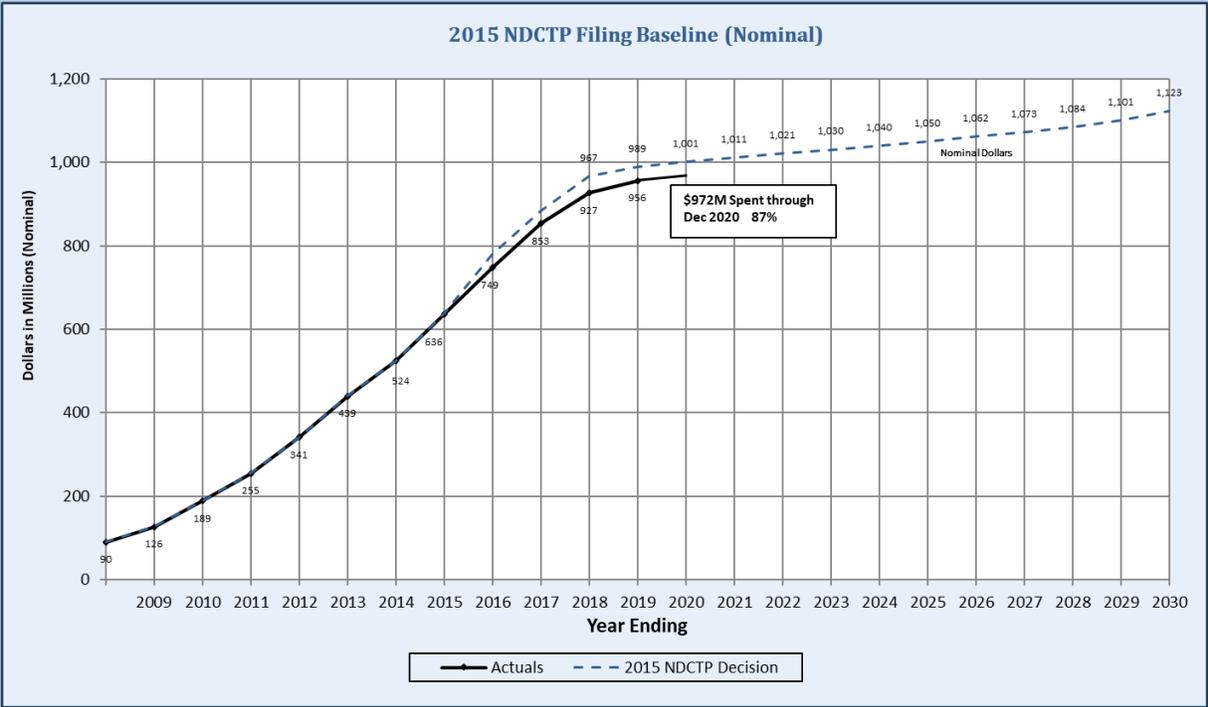
CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Attachment 1

Graph Tracking Total NDCTP Forecast and Actual
Decommissioning Expenditures



Comparison Forecast to Actual Expenditures In Millions			
	Baseline NDCTP Estimate (2014)	Escalated NDCTP ¹	Actual
Prior			524
2015	110	113	112
2016	135	142	113
2017	97	105	104
2018	74	83	74
2019	19	22	29
2020	11	13	16
2021	8	10	14F
2022	8	9	
2021-2030	86	122	

Notes:

1. Reflects PG&E's approved 2015 NDCTP escalation rates for PG&E labor, equipment and materials, contract labor, and other established by the CPUC.

Attachment 2

Description of Categories of Work and Reference to
Decommissioning Project Report

DESCRIPTION OF CATEGORIES OF WORK AND REFERENCE TO 2015 DECOMMISSIONING PROJECT REPORT

In accordance with Decision 14-02-024 PG&E provides a description of the decommissioning cost categories adopted for Humboldt Bay Power Plant Unit 3 (“HBPP”) with specific references to the Decommissioning Project Report for HBPP (“DPR”). The Decision directs that self-performed work shall include subcategories for staffing, tools and equipment, and contractors. These subcategories are identified in the relevant cost categories below.

Contingency. (DPR section 3.3.1.9)

For purposes of presenting decommissioning costs in advice letters, contingency has been allocated to each major cost category, rather than being identified as a separate cost category.

General Staffing (Excludes Caisson). (DPR section 3.3.1.1)

This cost category includes both PG&E employees and contract employees under their direct supervision. It includes general project support functions that cannot typically be identified with a single project activity such as engineering, radiation monitoring and protection, environmental support and compliance, training, licensing, contracting and procurement, and other general oversight/management. Staffing does not include short term consultants, janitorial and other site maintenance services, or direct labor supporting discrete projects such as carpenters, electricians, pipe fitters, Deconners, etc.

The forecasted expenditure for this scope is \$2.6 million in 2021.

Remainder of Plant Systems. (DPR section 3.3.1.3)

Remainder of Plant Systems activities have been completed.

Site Infrastructure. (DPR section 3.3.1.4)

Site Infrastructure activities have been completed.

Specific Project Costs (Excludes Disposal/Caisson/Canal). (DPR section 3.3.1.5)

Specific Project Costs (Excludes Disposal/Caisson/Canal) activities have been completed.

Waste Disposal (Excludes Caisson/Canal). (DPR section 3.3.1.6)

Waste Disposal activities have been completed.

Small Value Contracts. (DPR section 3.3.1.7)

Small value contracts consist of office supplies, specialty printing and communication services. This category also includes specialty contracts for consultation services and permitting.

The forecasted expenditure for this scope of work is \$1.3 million in 2021.

Spent Fuel Management. (DPR section 3.3.1.8)

This category includes estimated costs for storing high level radioactive waste on site prior to Department of Energy pickup. Included in this category are the costs for security staff (PG&E), operations and maintenance of the ISFSI, discrete labor/tools and equipment for the ISFSI upgrades, upgrades and maintenance to the facility, NRC fees, and other general staff (PG&E and contractors) supporting the ISFSI.

The forecasted expenditure for this scope of work is \$10.0 million in 2021.

Caisson Removal. (DPR section 3.3.2.1)

Caisson Removal activities have been completed.

Canal Remediation. (DPR section 3.3.2.2)

Canal Remediation activities have been completed.

Common Site Support - Caisson and Canals. (DPR section 3.3.2.3)

This category includes costs which can include shuttle service, offsite office space rental for general staff support, and operations of the groundwater treatment system. In 2021, projected expenditures are primarily for offsite office space rental.

The forecasted expenditure for this scope of work is \$0.1 million in 2021.

Engineering, Procurement and Construction Services (EPC). (DPR section 3.4)

Engineering, Procurement and Construction Services (EPC) activities have been completed.

Attachment 3

Spreadsheet Identifying Actual and Forecast Expenditures by
Cost Category and Current Authorization Request

	Remaining Project		2015-2020			2021		
	2015-NDCTP 2015-2030 (2014\$)	2015-NDCTP 2015-2030 (Nominal)	2015-NDCTP 2015-2020 (Nominal)	2015-2020 SPENT	Variance	Forecast 2021 Spend	Spent Plus 2021 Forecast Spend	(2015-2021) Approved 2015 NDCTP (Nominal)
General Staffing (Excludes Caisson)	44,453,015	47,719,038	47,689,210	43,628,092	4,061,118	2,586,101	46,214,193	47,719,038
Overall Project	31,110,683	33,332,622	33,332,622	36,384,998	(3,052,376)	1,858,389	38,243,388	36,624,848
License Termination Survey(Excludes Caisson)	7,769,468	8,436,202	8,436,202	7,243,094	1,193,109	727,712	7,970,805	9,941,788
Severence	910,750	1,007,882	1,007,882	-	1,007,882	-	-	1,152,402
Contingency	4,662,114	4,942,332	4,912,504	-	4,912,504	-	-	-
Remainder of Plant Systems	5,473,369	5,684,200	5,684,200	3,973,424	1,710,776	-	3,973,424	5,684,200
Direct Labor (PG&E and Contractor)	2,509,630	2,615,981	2,615,981	2,305,015	310,966	-	2,305,015	2,860,330
Liquid Radwaste System	-	-	-	-	-	-	-	-
Tools & Equipment	2,589,267	2,675,281	2,675,281	2,068,409	606,872	-	2,068,409	2,823,870
Disallowed Scope (Seismic Upgrades)	-	-	-	(400,000)	400,000	-	(400,000)	-
Contingency	374,472	392,937	392,937	-	392,937	-	-	-
Specific Project Costs (Excludes Disposal / Caisson / Can)	103,968,390	110,194,042	110,223,870	113,624,109	(3,400,239)	-	113,624,109	110,194,042
Reactor Vessel Removal	1,693,007	1,739,108	1,739,108	1,719,469	19,639	-	1,719,469	1,739,108
Turbine Bldg Demolition (Contractor)	-	-	-	-	-	-	-	-
Civil Works Contract	92,761,682	98,499,676	98,499,676	112,097,438	(13,597,762)	-	112,097,438	108,683,615
Disallowed Scope (Seismic Upgrades)	(190,206)	(198,853)	(198,853)	(192,798)	(6,055)	-	(192,798)	(228,681)
Contingency	9,703,906	10,154,111	10,183,939	-	10,183,939	-	-	-
Waste Disposal (Excludes Caisson / Canals)	34,822,844	38,799,614	38,799,614	39,125,854	(326,240)	-	39,125,854	38,799,614
Labor (Packaging and Handling)	2,221,071	2,314,370	2,314,370	2,240,236	74,134	-	2,240,236	2,314,370
Third Party Disposal Sites	30,349,040	34,134,740	34,134,740	36,912,708	(2,777,969)	-	36,912,708	36,485,244
Waste Handling Building (Contractor)	-	-	-	-	-	-	-	-
Disallowed Scope (Seismic Upgrades)	-	-	-	(27,090)	27,090	-	(27,090)	-
Contingency	2,252,732	2,350,505	2,350,505	-	2,350,505	-	-	-
Small Value Contracts	16,069,098	17,165,804	16,755,187	14,284,556	2,470,631	1,313,910	15,598,466	16,924,097
Small Dollar Vendors	1,857,790	1,978,370	1,978,370	2,000,090	(21,720)	168,910	2,169,000	2,079,591
Specialty Contracts	12,569,999	13,446,652	13,099,849	12,284,466	815,383	1,145,000	13,429,466	14,844,506
Contingency	1,641,309	1,740,782	1,676,968	-	1,676,968	-	-	-
Spent Fuel Management	137,146,443	177,760,150	56,197,422	42,107,944	14,089,528	10,018,605	52,126,549	65,971,214
Security (PG&E)	79,320,060	100,512,401	35,292,099	31,596,299	3,695,801	7,566,458	39,162,756	47,039,351
ISFSI O&M	7,530,894	9,568,176	3,321,270	2,430,940	890,329	665,293	3,096,233	4,253,344
NRC Fees	2,957,559	3,962,653	727,652	421,086	306,566	325,993	747,080	1,121,047
ISFSI Staffing / Engineering / Specialty Contracts	6,566,259	7,865,250	3,925,550	2,160,816	1,764,734	609,091	2,769,908	5,292,319
ISFSI Infrastructure Expenses	8,317,504	9,946,497	6,206,753	5,498,802	707,951	851,770	6,350,572	8,265,153
ISFSI Removal	10,969,760	19,207,848	-	-	-	-	-	-
Transfer to DOE	2,666,229	4,165,257	-	-	-	-	-	-
Contingency	18,818,177	22,532,068	6,724,147	-	6,724,147	-	-	-
Contingency (Excludes Caisson / Canals)								
Subtotal Base	341,933,159	397,322,848	275,349,552	256,743,978	18,605,574	13,918,617	270,662,595	285,292,205
Caisson	132,677,602	141,931,590	141,931,590	142,057,656	(126,066)	-	142,057,656	141,931,590
Field Work (Civil Works Contract)	64,212,338	67,900,149	67,900,149	81,321,414	(13,421,264)	-	81,321,414	81,405,385
Packaging/Material Handling	-	-	-	-	-	-	-	-
Project Staffing	14,724,336	15,799,824	15,799,824	13,123,799	2,676,024	-	13,123,799	18,152,723
Waste Disposal	21,824,507	24,645,144	24,645,144	33,868,155	(9,223,011)	-	33,868,155	26,205,862
License Termination Survey	3,354,407	3,612,137	3,612,137	6,175,063	(2,562,926)	-	6,175,063	4,486,368
Tools and Supplies	1,145,473	1,189,510	1,189,510	724,497	465,012	-	724,497	1,301,563
Other	7,717,907	8,232,482	8,232,482	6,844,728	1,387,754	-	6,844,728	9,663,248
Severence	579,550	625,902	625,902	-	625,902	-	-	716,441
Caisson Contingency	19,119,086	19,926,442	19,926,442	-	19,926,442	-	-	-
Canal Remediation	44,242,713	46,962,435	46,962,435	38,746,885	8,215,550	-	38,746,885	46,962,435
Removal (Civil Works Contract)	28,294,233	29,498,057	29,498,057	30,996,917	(1,498,860)	-	30,996,917	33,005,382
Disposal	11,660,406	13,022,552	13,022,552	7,749,969	5,272,583	-	7,749,969	13,957,053
Canal Contingency	4,288,073	4,441,826	4,441,826	-	4,441,826	-	-	-
Common Site Support - Caisson and Canals	2,158,445	2,325,047	2,325,047	1,355,798	969,248	88,453	1,444,251	2,325,047
Relocation of Trailer City	1,542,565	1,683,754	1,683,754	1,013,558	670,196	88,453	1,102,011	1,989,151
Groundwater Treatment	292,342	300,592	300,592	306,937	(6,345)	-	306,937	300,592
Groundwater Treatment System Operation	34,579	35,303	35,303	35,303	-	-	35,303	35,303
Contingency	288,960	305,398	305,398	-	305,398	-	-	-
EPC Services (Including Quality Training)	10,270,378	10,781,616	10,781,616	9,042,212	1,739,404	-	9,042,212	10,781,616
EPC Services	9,085,128	9,546,825	9,546,825	9,042,212	504,613	-	9,042,212	10,781,616
EPC Services Contingency	1,185,250	1,234,791	1,234,791	-	1,234,791	-	-	-
Subtotal Caisson / Canal / GWTS/EPC	189,349,138	202,000,687	202,000,687	191,202,552	10,798,136	88,453	191,291,005	202,000,687
TOTAL	531,282,297	599,323,535	477,350,239	447,946,530	29,403,710	14,007,070	461,953,599	487,292,892
Advice Letter Approvals				397,228,925				
Difference (Carry Over from previous period)				70,007,764			19,290,159	
Variance (between Advice Letter and Amount Spent/Forecast)				19,290,159			(5,283,089)	

Attachment 4

Comparison of Actual to Forecast Annual Cash Flow

(2014\$)						
Year	PG&E Labor	Equipment & Materials	Contractor Labor	Process & Burial	Other	TOTAL
2015	7,836,148	1,243,242	72,952,982	26,075,908	1,531,380	109,639,660
2016	7,114,709	432,272	74,802,527	23,273,256	1,055,992	106,678,756
2017	6,971,042	411,737	53,624,717	32,401,913	746,435	94,155,843
2018	6,948,852	627,810	44,890,351	11,869,676	850,564	65,187,254
2019	6,066,229	168,724	18,284,996	455,213	338,631	25,313,792
2020	5,618,390	60,473	6,952,091	18,911	1,214,606	13,864,472
2021	5,856,871	-	4,231,409	-	1,503,424	11,591,704
2022	5,104,606	-	1,636,903	-	3,681,593	10,423,102
2023	5,104,606	-	1,616,644	-	3,698,371	10,419,622
2024	5,104,606	-	1,555,868	-	3,698,733	10,359,207
2025	5,104,606	-	1,555,868	-	4,092,941	10,753,415
2026	5,104,606	-	2,107,918	-	4,007,578	11,220,102
2027	5,104,606	-	1,616,645	-	3,644,758	10,366,009
2028	5,104,606	-	1,598,661	-	3,707,601	10,410,868
2029	5,104,606	-	2,258,845	-	5,317,320	12,680,772
2030	299,072	-	5,187,853	3,498,736	8,704,966	17,690,627
TOTAL	87,548,162	2,944,257	294,874,279	97,593,612	47,794,895	530,755,205
					Spent Prior to 2015	524,044,587
					Total Project Forecast	1,054,799,792

(Nominal \$)						
Year	PG&E Labor	Equipment & Materials	Contractor Labor	Process & Burial	Other	TOTAL
2015	8,054,777	1,255,550	74,463,109	27,379,703	1,547,459	112,700,598
2016	7,526,755	443,362	78,206,267	25,658,765	1,085,540	112,920,689
2017	7,590,111	429,690	57,713,108	37,509,264	781,440	104,023,613
2018	7,786,877	666,781	49,783,103	14,427,665	906,784	73,571,210
2019	6,996,305	182,518	20,913,086	580,980	367,950	29,040,838
2020	6,669,014	66,658	8,202,550	25,342	1,345,903	16,309,468
2021	7,155,091	-	5,151,705	-	1,700,273	14,007,070
2022	6,389,178	-	2,046,367	-	3,897,329	12,332,874
2023	6,575,742	-	2,086,424	-	3,942,335	12,604,501
2024	6,767,753	-	2,073,045	-	3,970,153	12,810,952
2025	6,965,372	-	2,140,627	-	4,424,426	13,530,425
2026	7,168,761	-	2,995,574	-	4,363,723	14,528,059
2027	7,378,089	-	2,372,319	-	3,998,125	13,748,532
2028	7,593,529	-	2,421,937	-	4,097,675	14,113,141
2029	7,815,260	-	3,532,294	-	5,921,805	17,269,359
2030	471,255	-	8,372,163	7,024,344	9,770,612	25,638,375
TOTAL	108,903,870	3,044,558	322,473,679	112,606,064	52,121,534	599,149,704
					Spent Prior to 2015	524,044,587
					Total Project Forecast	1,123,194,291

Attachment 5

Comparison of Actual to Forecast Project Schedule

HBPP Unit 3 Comparison Forecast to Actual Schedule					
Activity Name	2015 NDCTP Expected Start	2015 NDCTP Expected Finish	Most Recent Forecast Start	Most Recent Forecast Finish	Explanation of Major Changes
1) RPV Equipment & System Removal					
RPV Internals Removal & Segmentation	27-Mar-12	10-Sep-13	27-Mar-12 A	27-Sep-13 A	
Cask Operations & Loading - Casks 3, 4, 5, 7 & 8	28-Jun-13	8-Oct-13	28-Jun-13 A	7-Feb-14 A	
Control Rod Blade Loading & Shipping	1-Aug-13	10-Sep-13	2-Aug-13 A	4-Sept-13 A	
Contractor Final SFP Cleaning & Equipment Removal	11-Sep-13	9-Oct-13	22-Jul-13 A	27-Sep-13 A	
GTCC Mobilization & Cask 6 Loading	24-Oct-13	26-Dec-13	5-Nov-13 A	25-Nov-13 A	
Decon Facility Removal	27-Dec-13	31-Jan-14	9-Oct-13 A	22-Oct-13 A	
Drywell Containment Building	3-Feb-14	15-Apr-14	18-Nov-13 A	14-Feb-14 A	
RPV Shell Segmentation	16-Apr-14	24-Mar-15	18-Feb-14 A	11-Jun-15 A	
Drywell Insulation Removal	25-Mar-15	6-Jul-15	15-Jun-15 A	20-Jul-15 A	
Drywell Piping Removal	7-Jul-15	29-Sep-15	12-Aug-15 A	25-Sep-17 A	Work re-sequenced to be removed more efficiently with Caisson
Emergency Condenser Interference Removals	26-Jul-13	23-Sep-13	9-Aug-13 A	16-Oct-13 A	
2) Balance of Equipment & System Removals					
Emergency Condenser Vent Piping Removal	16-Apr-14	5-Jun-14	9-Aug-13 A	28-Sep-13 A	
Emergency Condenser Removal	6-Jun-14	24-Jul-14	6-Dec-13 A	20-Dec-13 A	
SFP Pumps & Filters Removal	28-Jan-14	28-May-14	14-Nov-13 A	14-Mar-14 A	
Condensate Demineralizer Equipment Removals	9-Jan-14	13-Apr-15	23-Jan-14 A	26-Jun-14 A	
LRW Phase 2 Equipment Removals	2-Jul-13	14-May-14	3-Jul-13 A	14-Mar-14 A	
FIXS Installation & Testing	2-Jan-13	24-Jul-13	2-Jan-13 A	1-Aug-13 A	
FIXS Collection & Process Readiness	3-Sep-13	5-Nov-13	14-Oct-13 A	11-Dec-13 A	
Suppression Chamber East Removals	5-Nov-12	10-May-13	21-Dec-12 A	26-Apr-13 A	
CRDM Removals	24-May-13	23-Oct-13	25-Jun-13 A	12-Feb-14 A	
Suppression Chamber West Removals	10-Jun-13	1-Aug-13	10-Jun-13 A	26-Feb-14 A	
Access Shaft Component Removal -66 Elev.	24-Oct-13	14-Jan-14	7-Jan-14 A	12-Jun-14 A	
Access Shaft Component Removal -54 to -44 Elev.	15-Jan-14	6-Jun-14	25-Feb-14 A	29-May-14 A	
Access Shaft Component & Block Walls Removals -34 to -2 Elev.	2-Jul-13	14-Oct-14	2-Jul-13 A	28-Apr-14 A	
Valve Gallery Component Removals - Phase 2	9-Apr-13	8-May-14	9-Apr-13 A	21-Mar-14 A	
Trailer City Move & Staff Relocation	8-Jul-13	31-Oct-13	16-Jul-13 A	25-Nov-13 A	
Facility Water, Sewer & Road Modifications	14-Aug-13	5-Mar-14	14-Aug-13 A	25-Oct-13 A	
Hot Machine Shop Removals & Relocation	28-Mar-13	13-Sep-13	25-Jun-13 A	19-Nov-13 A	
3) Demolition & Civil Works					
LTP to NRC	N/A	3-May-13	N/A	3-May-13 A	
LTP Public Meeting	N/A	20-Aug-13	N/A	20-Aug-13 A	
Turbine Building Removal to +12 Civil Contract	1-Oct-12	16-Oct-13	1-Oct-12 A	12-Sep-13 A	
Civil Works Procurement, Contract Award & Mobilization	18-Dec-12	9-Jan-14	18-Dec-12 A	23-Jul-13 A	
Demo SAS Building	14-Jan-14	11-Mar-14	10-Sept-14 A	30-Oct-14 A	
Demo Hot Machine Shop	14-Jan-14	28-Apr-14	06-May-14 A	29-Sep-14 A	
Demo Liquid Rad Waste Building	15-May-14	23-Oct-14	08-Jan-15 A	4-Aug-15 A	
Demo Low Level Waste Building	3-Jun-14	24-Jul-14	24-Mar-15 A	10-Apr-15 A	
Demo Solid Rad Waste Handling Build (SRHB)	15-May-14	6-Aug-14	12-May-15 A	9-Jun-15 A	
Demo High Level Storage Vault Area	26-Jun-14	13-Nov-14	16-Jun-15 A	6-May-16 A	
Slurry Wall Prep & Mobilize	14-Jan-14	24-Jun-14	19-May-15 A	02-Jul-15 A	
Slurry Wall Pre-Trenching	25-Jun-14	13-Nov-14	23-Apr-14 A	05-Oct-16 A	
Construct Slurry Wall	22-Oct-14	23-Jul-15	25-Jun-15 A	17-May-16 A	
Drain Spent Fuel Pool & Apply Fixatives	28-Jul-15	12-Oct-15	02-Oct-14 A	10-Jun-15 A	
Units 1 & 2 Slab/Foundation Removals	22-Apr-15	22-Jun-15	22-May-14 A	2-May-18 A	
Remove TB Slabs	23-Jun-15	6-Oct-15	10-Apr-15 A	6-Oct-16 A	
Refuel Building Demo & Containment Installation	23-Aug-16	7-Feb-17	23-Oct-15 A	30-Aug-16 A	
SFP Removal/Backfill & CSM Wall Installation	8-Feb-17	9-Nov-17	1-Jul-15 A	5-Jul-16 A	
Excavations & Concrete Demo to -22 ft	14-Nov-17	15-Mar-18	18-Oct-16 A	11-May-17 A	
Drywell Liner & Activated Concrete Removals	30-Sep-15	18-Aug-16	25-April-17 A	16-Jun-17 A	Work re-sequenced to be removed more efficiently with Caisson
Excavations & Concrete Demo to -74 ft	20-Mar-18	18-Sep-18	13-June-17 A	13-Dec-17 A	Concrete Excavation was executed efficiently
Final Caisson Survey & Backfill to -28	19-Sep-18	31-Dec-18	18-Apr-18 A	20-Apr-18 A	Caisson Demo Backfill -30 to -20
Circ Water & South Yard Piping Removals	28-May-14	28-Oct-14	2-Feb-17 A	12-Mar-18 A	
4) Remediation Restoration & Closeout					
Intake Canal Demolition & Remediation	30-Apr-14	10-Sep-14	10-May-16 A	08-Dec-16 A	Project start date changed to avoid potential site space constraints
Discharge Canal Demolition & Remediation	24-Jun-14	5-Feb-15	30-Dec-14 A	04-Nov-16 A	Adverse weather impacts
Final Site Restoration	9-Feb-17	20-Feb-19	24-Jan-17 A	11-Sep-19 A	Final Site Restoration Demob complete 9/11/19 was last field work. 9/26/19 demob complete
Project Administration & Close-out	15-May-19	13-May-20	11-Sep-19 A	5-Dec-19 A	Milestone Last item received-Lien releases from subcontractors
Submit LAR to NRC	N/A	N/A	N/A	31-Dec-21	Milestone impacted by COVID-19 & pending NRC approval of License Amendment Request 21-01, Revise Methodology in License Termination Plan made by PG&E

Note: An "A" appearing after the Start or Finish date indicates that the date is the Actual Start or Actual Finish.

Attachment 6

Decommissioning Projects Expenditures Pending
Reasonableness Review

Decommissioning Projects Expenditures Pending Reasonableness Review ¹	2009-2011	2012-2014	2015-2018	2019-2020 ²
General Staffing (Excludes Caisson)	303,363	7,327,142	5,218,185	10,693,848
Overall Project				-
License Termination Survey (Excludes Caisson)	303,363	7,327,142	5,218,185	2,024,886
License Termination/FSS Oversight				8,668,963
Remainder of Plant Systems	-	-	-	-
Direct Labor (PG&E and Contractor)	-			-
Liquid Radwaste System				-
Tools & Equipment				-
Site Infrastructure				
Specific Project Costs (Excludes Disposal / Caisson / Canal)	-	-	29,420,240	-
Reactor Vessel Removal				-
Turbine Bldg Demolition (Contractor)				-
Civil Works - Final Site Restoration			29,420,240	-
Waste Disposal (Excludes Caisson / Canals)	-	-	-	-
Labor (Packaging and Handling)				-
Third Party Disposal Sites				-
Small Value Contracts	-	-	-	17,505,403
Small Dollar Vendors				613,938
Specialty Contracts				3,528,684
Civil Works-FSR				13,286,239
FSS Tools & Equipment				107,029
Office Facilities Rent				323,452
Residual Remediation / Waste Disposal				(353,938)
Spent Fuel Management	-	-	-	16,252,476
Security (PG&E)				11,265,557
ISFSI O&M				851,668
NRC Fees				281,630
ISFSI Staffing / Engineering / Specialty Contracts				280,467
ISFSI Infrastructure Expenses				3,573,154
Transfer to DOE				-
ISFSI Removal				-
Caisson	-	-	-	-
Field Work (Civil Works Contract)				-
Packaging/Material Handling				-
Project Staffing				-
Waste Disposal				-
License Termination Survey				-
Tools and Supplies				-
Other				-
Canal Remediation	-	-	-	-
Removal (Civil Works Contract)				-
Disposal				-
Common Site Support - Caisson and Canals	-	-	-	-
Relocation of Trailer City				-
Groundwater Treatment				-
Groundwater Treatment System Operation				-
EPC Services (Including Quality Training)	-	-	-	-
EPC Services				-
Total Decommissioning Costs Not Yet Presented For Prudency Review	303,363	7,327,142	34,638,425	44,451,728

Note:

1. These expenditures reflect costs incurred to date from ongoing projects which have not yet been presented for reasonableness review; these amounts exclude costs which were presented for reasonableness review in the 2018 NDCTP.

2. 2019-2020 expenditures reported in 2018 NDCTP DCE format.

Attachment 7

Comparison of Amounts Previously Requested for Each Activity
versus Total Amount Spent

Comparison Amounts Previously Requested for each Activity versus Total Amounts Spent

(Dollars in Thousands)

AL Disbursement Authorizations Prior to 2012 NDCTP Phase 1 Decision			
	Authorizations Prior to November 2007	November 2007 - January 2014 Disbursement Authorizations ¹	Total
ISFSI O&M (including Security Staffing)		21,628	21,628
Reactor Vessel	100	56,361	56,461
Tools, Equipment, and Health Physics Supplies		20,120	20,120
Field Work and Site Infrastructure/Mods		68,247	68,247
Staffing and Specialty Consultants		120,096	120,096
Packaging, Transportation and Disposal		87,442	87,442
Building Demo (including decontamination)		32,842	32,842
Other		2,350	2,350
Miscellaneous	69,219	22,700	91,919
Subtotal	69,319	431,786	501,106
AL Disbursement Authorizations Post 2012 NDCTP Phase 1 Decision			
	(May 2014 -April 2016)		Total
General Staffing (Excludes Caisson)			57,808
Remainder of Plant Systems			20,689
Site Infrastructure			575
Specific Project Costs (Excludes Disposal/Caisson/Canal)			92,847
Waste Disposal (Excludes Caisson/Canal)			33,537
Small Value Contracts			14,177
Spent Fuel Management			22,467
Caisson Removal			91,648
Canal Removal			79,442
Common Site Support Caisson and Canals			2,893
Requested Funds in previous Advice Letters			(139,719)
Subtotal			276,363
AL Disbursement Authorizations Post 2015 NDCTP Decision			
	(March 2017 - May 2020)		Total
General Staffing (Excludes Caisson)			31,114
Remainder of Plant Systems			2,110
Site Infrastructure			-
Specific Project Costs (Excludes Disposal/Caisson/Canal)			91,078
Waste Disposal (Excludes Caisson/Canal)			14,794
Small Value Contracts			11,099
Spent Fuel Management			53,664
Caisson Removal			84,561
Canal Removal			12,678
Common Site Support Caisson and Canals			2,144
EPC			1,574
Requested Funds in previous Advice Letters			(91,003)
Subtotal			213,812
Cumulative Advice Letter Requests Total			991,281
Amount Spent through 2020			971,991
Delta			19,290

¹Reflects pro rated \$29.4 million reduction to PG&E's initial requested disbursement in Advice Letter 3649-E- in accordance with Advice Letter 3649-E-A

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
California Cotton Ginners & Growers Assn
California Energy Commission

California Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
California Public Utilities Commission
Calpine

Cameron-Daniel, P.C.
Casner, Steve
Cenergy Power
Center for Biological Diversity

Chevron Pipeline and Power
City of Palo Alto

City of San Jose
Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services
Don Pickett & Associates, Inc.
Douglass & Liddell

East Bay Community Energy Ellison
Schneider & Harris LLP Energy
Management Service
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie

Green Power Institute
Hanna & Morton
ICF

IGS Energy
International Power Technology
Intestate Gas Services, Inc.
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated
Waste Management Task Force
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

Office of Ratepayer Advocates
OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
San Diego Gas & Electric Company

SPURR
San Francisco Water Power and Sewer
Sempra Utilities

Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy