

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6550E
As of May 5, 2022

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: 04-04-2022

Date to Calendar: 04-11-2022

Authorizing Documents: None

Disposition:	Accepted
Effective Date:	05-04-2022

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Annie Ho

(415) 973-8794

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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 4, 2022

Advice 6550-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 2021 expenditures results in adequate funding for 2022 planned expenditures¹. As a result, PG&E is not requesting the disbursement of funds for planned decommissioning expenditures in 2022. The total planned expenditure for 2022 is \$9.6 million (in nominal dollars).

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. Advice 6162-E in 2021 authorized funding of \$14.0 million and 2021 actual expenditures in 2021 totaled \$9.6 million, resulting in \$9.7 million remaining unspent in 2022.

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 \$1.111 billion (nominal/2018 \$) in PG&E’s 2018 Nuclear Decommissioning Cost Triennial Proceeding (NDCTP), D.21-09-003 issued on September 21, 2021. PG&E filed its 2021 NDCTP Application A.21-12-007 on December 14, 2021 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, 2021, the Trusts had a market value of \$164.3 million, a liquidation value of \$155.2 million, and an expense equivalent liquidated value of \$155.5 million.⁶

Present Request

All the \$9.6 million projected 2022 expenditure in this request is for amounts and activities included and approved in the 2018 NDCTP:

Major Cost Category	Amount Requested for 2022
Spent Fuel Management	\$9.6 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 2021 as authorized in Advice

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.

⁷ D.11-07-003, Attachment B.

Letter 6162-E totaled \$14.0 million; the actual amount spent was \$9.6 million. Within that amount, expenditures for Spent Fuel Management were \$2.7 million less than the expenditures projected in the Advice Letter; General Staffing expenditures were \$1.2 million less. The other decommissioning activities during 2021 made up the remaining \$0.6 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 – Annual Cash Flow

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 2018 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

⁸ Values may not sum due to rounding.

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

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than April 25, 2022, which is 21 days⁹ after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to PG&E via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
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 and 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 4, 2022, 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 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

⁹ The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.



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 U39 E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: AMHP@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) #: 6550-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 #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

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: 5/4/22

No. of tariff sheets: N/A

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

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson
Title: Director, Regulatory Relations
Utility/Entity Name: Pacific Gas and Electric Company

Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Contact Name:
Title:
Utility/Entity Name:

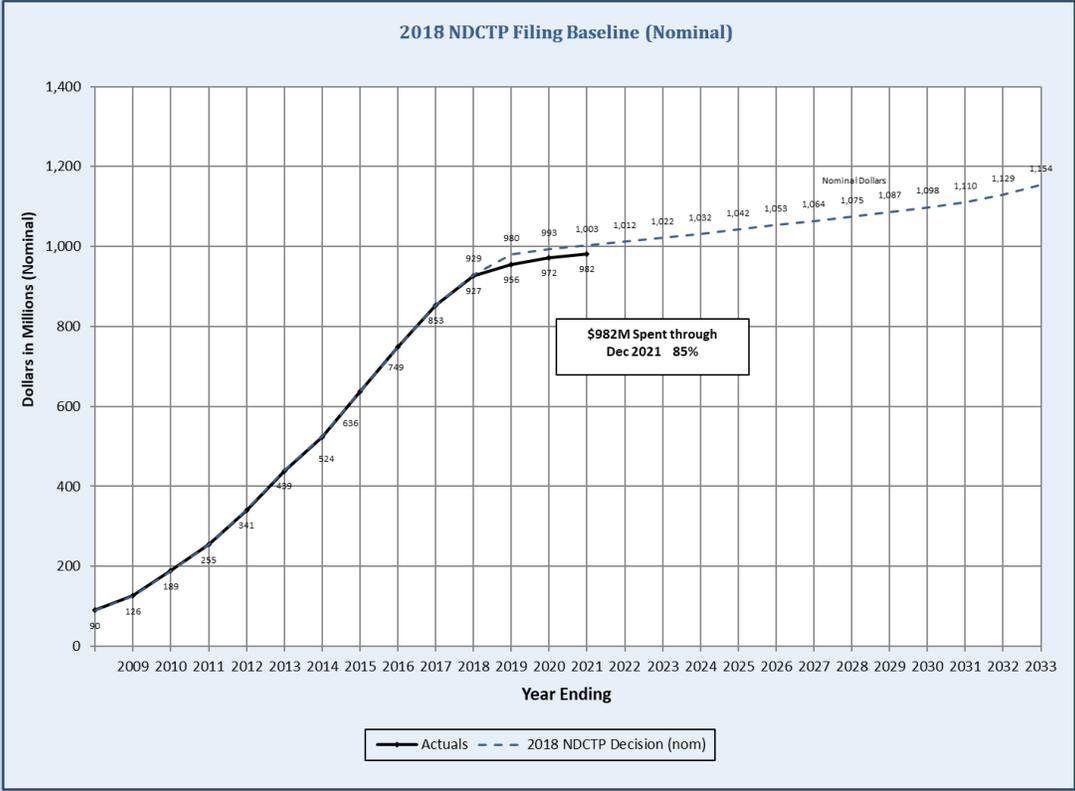
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Clear Form

Attachment 1

Graph Tracking Total NDCTP Forecast and Actual
Decommissioning Expenditures



Comparison Forecast to Actual Expenditures In Millions			
	Baseline NDCTP Estimate (2018)	Escalated NDCTP ¹	Actual
Prior			524
2015-2018			403
2019	50	51	29
2020	12	13	16
2021	9	10	10
2022	8	9	10F
2023	8	10	
2024-2033	95	132	

Notes:

1. Reflects PG&E's approved 2018 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 cost categories in the 2018 NDCTP remained unchanged from the cost categories in the 2015 HBPP DPR. 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. 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.

The activities in the following 2018 NDCTP cost categories have been completed:

- General Staffing (Excludes Caisson). (2015 NDCTP DPR section 3.3.1.1)
- Remainder of Plant Systems. (2015 NDCTP DPR section 3.3.1.3)
- Site Infrastructure. (2015 NDCTP DPR section 3.3.1.4)
- Specific Project Costs (Excludes Disposal/Caisson/Canal). (2015 NDCTP DPR section 3.3.1.5)
- Waste Disposal (Excludes Caisson/Canal). (2015 NDCTP DPR section 3.3.1.6)
- Small Value Contracts. (2015 NDCTP DPR section 3.3.1.7)
- Caisson Removal. (2015 NDCTP DPR section 3.3.2.1)
- Canal Remediation. (2015 NDCTP DPR section 3.3.2.2)
- Common Site Support - Caisson and Canals. (2015 NDCTP DPR section 3.3.2.3)
- Engineering, Procurement and Construction Services (EPC). (2015 NDCTP DPR section 3.4)

Spent Fuel Management. (2015 NDCTP 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 \$9.6 million in 2022.

Attachment 3

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

	Remaining Project		2019-2021			2022		
	2018 NDCTP 2019-2033 (2018\$)	2018 NDCTP 2019-2033 (Nominal)	2018 NDCTP 2019-2021 (Nominal)	2019-2021 Spent	Variance	Forecast 2022 Spend	Spent Plus 2022 Forecast Spend	(2019-2022) Approved 2018 NDCTP (Nominal)
General Staffing (Excludes Caisson)	13,170,667	13,679,833	13,679,833	12,219,731	1,460,101	-	12,219,731	13,679,833
Overall Project	8,950,127	9,303,891			-		-	-
License Termination Survey (Excludes Caisson)	3,796,433	3,939,981	3,939,981	2,636,548	1,303,433		2,636,548	3,939,981
License Termination / FSS Oversight			9,303,891	9,583,183	(279,292)		9,583,183	9,303,891
Severance	424,106	435,961	435,961		435,961			435,961
Remainder of Plant Systems	-	-	-	-	-	-	-	-
Specific Project Costs (Excludes Disposal / Caisson / Canal)	-	-	-	-	-	-	-	-
Waste Disposal (Excludes Caisson / Canals)	-	-	-	-	-	-	-	-
Small Value Contracts	21,070,030	21,777,860	21,536,153	18,036,270	3,499,882	-	18,036,270	21,655,187
Small Dollar Vendors	348,487	360,047	360,047	710,841	(350,793)		710,841	360,047
Specialty Contracts	5,622,074	5,861,771	5,620,064	2,824,457	2,795,607		2,824,457	5,739,098
Final Site Restoration	12,131,414	12,489,359	12,489,359	13,286,239	(796,880)		13,286,239	12,489,359
Residual Remediation / Waste Disposal	1,087,709	1,139,394	1,139,394	695,705	443,689		695,705	1,139,394
Tools & Equipment	883,350	901,255	901,255	107,029	794,226		107,029	901,255
Office Facilities Rent	996,996	1,026,033	1,026,033	412,000	614,033		412,000	1,026,033
Spent Fuel Management	148,275,144	189,616,545	38,540,860	23,566,884	14,973,975	9,605,142	33,172,026	47,854,200
Security (PG&E)	98,114,443	120,956,434	25,211,826	16,248,784	8,963,042	6,872,671	23,121,455	32,741,253
ISFSI O&M	8,913,090	11,210,349	2,352,854	1,656,517	696,337	900,465	2,556,982	3,039,067
NRC Fees	4,418,035	5,635,288	947,597	327,417	620,180	120,000	447,417	1,283,842
ISFSI Staffing / Engineering / Specialty Contracts	8,450,840	10,011,118	3,460,890	1,547,073	1,913,817	1,200,000	2,747,073	4,088,432
ISFSI Infrastructure Expenses	9,342,738	10,842,094	6,567,692	3,787,093	2,780,599	512,006	4,299,099	6,701,605
ISFSI Removal	15,368,552	25,435,773	-	-	-	-	-	-
Transfer to DOE	3,667,446	5,525,490	-	-	-	-	-	-
Caisson	-	-	-	-	-	-	-	-
Canal Remediation	-	-	-	-	-	-	-	-
Common Site Support - Caisson and Canals	-	-	-	-	-	-	-	-
EPC Services (including Quality Training)	-	-	-	-	-	-	-	-
Costs Closed out in 2018 NDCTP included in 2019 SAP accounting	-	-	-	1,081,195				
TOTAL	182,515,841	225,074,238	73,756,846	54,904,081	19,933,959	9,605,142	63,428,028	83,189,220
Advice Letter Approvals				44,436,670				
Difference (Carry Over from previous period)				20,203,793		9,736,382		
Variance (between Advice Letter and Amount Spent/Forecast)				9,736,382		(131,240)		

Attachment 4

Annual Cash Flow

(2018\$)						
Year	PG&E Labor	Equipment & Materials	Contractor Labor	Process & Burial	Other	TOTAL
2019	6,773,123	178,302	20,243,867	553,325	359,377	28,107,994
2020	6,249,533	63,438	7,677,587	22,985	1,280,358	15,293,901
2021	6,127,119	131,439	1,825,860	17,624	574,648	8,676,691
2022	5,107,068	-	2,528,572	-	813,811	8,449,451
2023	6,084,599		2,373,056		1,859,849	10,317,504
2024	6,084,599		2,306,517		1,844,923	10,236,039
2025	6,084,599		2,306,517		1,844,923	10,236,039
2026	6,084,599		2,910,918		1,956,331	10,951,848
2027	6,084,599		2,373,056		1,851,320	10,308,975
2028	6,084,599		2,339,787		1,848,122	10,272,507
2029	6,084,599		2,339,787		1,848,122	10,272,507
2030	6,084,599		2,339,787		1,848,122	10,272,507
2031	6,084,599		2,353,367		1,869,509	10,307,475
2032	6,084,599		5,441,623		2,608,511	14,134,733
2033	326,191		9,239,758	3,774,758	3,657,271	16,997,978
TOTAL	85,429,021	373,179	68,600,060	4,368,692	26,065,197	184,836,149
					Spent Prior to 2019	926,640,811
					Total Project Forecast	1,111,476,960

(Nominal \$)						
Year	PG&E Labor	Equipment & Materials	Contractor Labor	Process & Burial	Other	TOTAL
2019	6,996,305	182,518	20,913,086	580,980	367,950	29,040,839
2020	6,669,014	66,658	8,202,550	25,342	1,345,903	16,309,467
2021	6,753,879	141,576	2,018,417	20,403	619,500	9,553,775
2022	5,815,381	-	2,891,118	-	898,643	9,605,142
2023	6,860,999	-	2,580,891	-	1,645,638	11,087,528
2024	7,097,182	-	2,594,119	-	1,674,845	11,366,146
2025	7,341,158	-	2,688,543	-	1,720,230	11,749,932
2026	7,593,186	-	3,573,202	-	1,900,099	13,066,487
2027	7,853,530	-	2,969,008	-	1,819,785	12,642,324
2028	8,122,466	-	3,022,477	-	1,862,653	13,007,595
2029	8,400,277	-	3,122,159	-	1,909,952	13,432,388
2030	8,687,256	-	3,222,559	-	1,957,506	13,867,321
2031	8,983,704	-	3,346,579	-	2,033,775	14,364,058
2032	9,289,936	-	8,281,356	-	3,087,068	20,658,360
2033	530,856	-	14,652,993	7,847,450	4,611,886	27,643,185
TOTAL	106,995,129	390,752	84,079,057	8,474,175	27,455,433	227,394,547
					Spent Prior to 2019	926,640,811
					Total Project Forecast	1,154,035,357

Attachment 5

Comparison of Actual to Forecast Project Schedule

HBPP Unit 3 Comparison Forecast to Actual Schedule					
Activity Name	2015 NDCTP ¹ Expected Start	2015 NDCTP Expected Finish	Most Recent Forecast Start	Most Recent Forecast Finish ²	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-Sept-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-July-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	21-Oct-21A	Milestone impacted by COVID-19 & pending NRC approval of License Amendment Request 21-01, Revise Methodology in License Termination Plan made by PG&E. PG&E submitted request to terminate the Part 50 Operating license on 10/21/21.
10 CFR Part 50 License Termination	N/A	N/A	N/A	18-Nov-21A	The NRC terminated the Part 50 license on 11/18/21.
5) Spent Fuel Management (10 CFR Part 72)					
ISFSI Operations	N/A	30-Jun-32	N/A	30-Jun-32	
DOE pickup of spent nuclear fuel & GTCC waste	1-Jan-31	30-Jun-32	1-Jan-31	30-Jun-32	
ISFSI demolition & site restoration	1-Jul-32	30-Jun-33	1-Jul-32	30-Jun-33	
10 CFR Part 72 License Termination	1-Jul-33	31-Dec-33	1-Jul-33	31-Dec-33	

Notes:

1. The 2018 NDCTP DCE adopted the assumptions of the 2015 NDCTP DCE.
2. 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	2021
General Staffing (Excludes Caisson)	-	-	-	-	
Remainder of Plant Systems	-	-	-	-	
Site Infrastructure					
Specific Project Costs (Excludes Disposal / Caisson / Canal)	-	-	-	-	
Waste Disposal (Excludes Caisson / Canals)	-	-	-	-	
Small Value Contracts	-	-	-	-	
Spent Fuel Management	-	-	-	-	7,314,409
Security (PG&E)					4,983,227
ISFSI O&M					804,849
NRC Fees					45,788
ISFSI Staffing / Engineering / Specialty Contracts					1,266,607
ISFSI Infrastructure Expenses					213,939
Transfer to DOE				-	-
ISFSI Removal				-	-
Caisson	-	-	-	-	
Canal Remediation	-	-	-	-	
Common Site Support - Caisson and Canals	-	-	-	-	
EPC Services (including Quality Training)	-	-	-	-	
EPC Services				-	
Total Decommissioning Costs Not Reviewed For Prudence Prior to 2021 NDCTP Filing	-	-	-	-	7,314,409

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 are being presented for reasonableness review in the 2021 NDCTP. Actual costs 2019-2020 have been presented for reasonableness review in the 2021 NDCTP.

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 2021)		Total
General Staffing (Excludes Caisson)			33,700
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			12,413
Spent Fuel Management			63,682
Caisson Removal			84,561
Canal Removal			12,678
Common Site Support Caisson and Canals			2,233
EPC			1,574
Requested Funds in previous Advice Letters			(105,010)
Subtotal			213,812
Cumulative Advice Letter Requests Total			991,281
Amount Spent through 2021			981,545
Delta			9,736

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.
Braun Blasing Smith Wynne, P.C.
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
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
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie
Green Power Institute
Hanna & Morton
ICF
International Power Technology

Intertie

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
McClintock IP
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

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
Uplight
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy