

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



**Pacific Gas & Electric Company**  
**ELC (Corp ID 39)**  
**Status of Advice Letter 6917E**  
**As of May 22, 2023**

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: 04-14-2023

Date to Calendar: 04-19-2023

Authorizing Documents: D1107003

|                        |                   |
|------------------------|-------------------|
| <b>Disposition:</b>    | <b>Accepted</b>   |
| <b>Effective Date:</b> | <b>05-14-2023</b> |

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Kimberly Loo

(415)973-4587

[PGETariffs@pge.com](mailto: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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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](mailto:edtariffunit@cpuc.ca.gov)**

April 14, 2023

**Advice 6917-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**

**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 requests approval of the disbursement of \$6.8 million for planned Spent Fuel Management expenditures in 2023. The total planned expenditure for 2023 is \$9.4 million (in nominal dollars)<sup>1</sup>.

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 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 2017 through 2019 pursuant to D.17-05-020; and in 2022 pursuant to D.21-09-003.

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<sup>1</sup> The remaining \$2.6 million was authorized through Advice 5495-E but was not spent in years 2018-2022.

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,<sup>2</sup> and specified information to be included in future advice letters.<sup>3</sup> That decision also requires PG&E to submit an advice letter at least once every calendar year.<sup>4</sup> D.14-02-024 specified additional information to be provided when seeking Trust disbursement authorizations.<sup>5</sup> PG&E's compliance Advice Letter 4379-E providing the revised reporting format was effective March 21, 2014.

As of December 31, 2022, the Trusts had a market value of \$132.8 million, a liquidation value of \$130.0 million, and an expense equivalent liquidated value of \$130.2 million.<sup>6</sup>

### **Present Request**

All the \$9.4 million projected 2023 expenditure in this request is for amounts and activities included and approved in the 2018 NDCTP:

| <b>Major Cost Category</b> | <b>Amount Requested for 2023</b> |
|----------------------------|----------------------------------|
| Spent Fuel Management      | \$9.4 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.<sup>7</sup> PG&E's projected expenditures for 2022 as authorized in Advice Letter 6550-E totaled \$9.6 million; the actual amount spent was \$7.1 million. Within that amount, expenditures for Spent Fuel Management were \$2.5 million less than the expenditures projected in the Advice Letter.<sup>8</sup>

<sup>2</sup> See Resolution E-4268.

<sup>3</sup> D.11-07-003, Attachment B.

<sup>4</sup> D.11-07-003, Ordering Paragraph 3.

<sup>5</sup> D.14-02-024, Ordering Paragraph 2.

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

<sup>7</sup> D.11-07-003, Attachment B.

<sup>8</sup> Values may not sum due to rounding.

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 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 in subsequent NDCTPs.

**Protests**

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than May 4, 2023, which is 20 days 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 14, 2023, 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 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/

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Sidney Bob Dietz II  
Director, Regulatory Relations  
CPUC Communications

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 U39 E)

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: KELM@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) #: 6917-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: 5/14/23

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 proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss 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](mailto: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:  
Facsimile (xxx) xxx-xxxx:  
Email: PGETariffs@pge.com

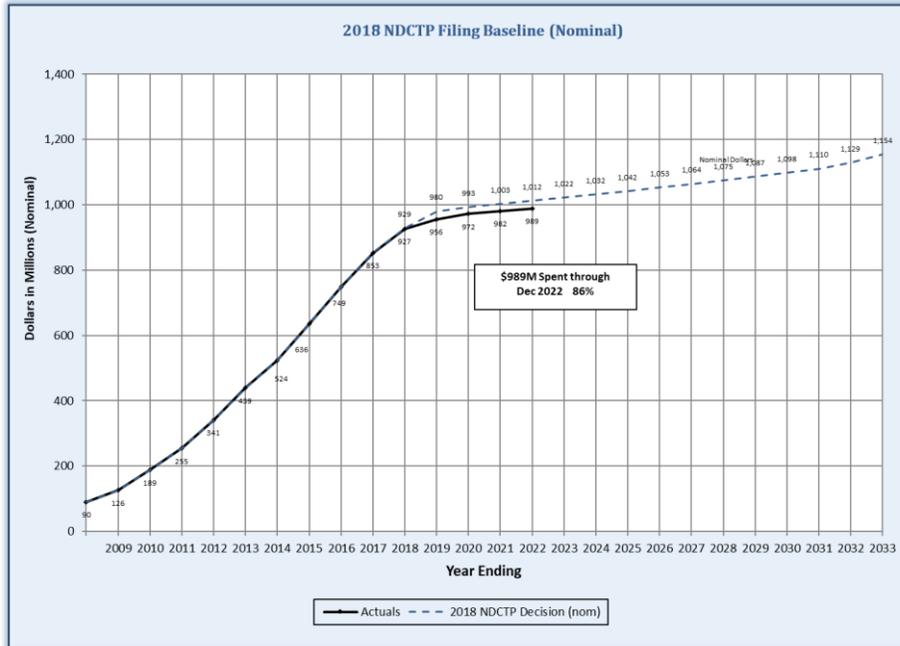
Contact Name:  
Title:  
Utility/Entity Name:  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

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



| <b>Comparison Forecast to Actual Expenditures<br/>In Millions</b> |   |                                 |        |
|---|---|---------------------------------|--------|
|   | Baseline<br>NDCTP<br>Estimate<br>(2018) | Escalated<br>NDCTP <sup>1</sup> | Actual |
| Prior   |   |                                 | 524    |
| 2015-2018   |   |                                 | 403    |
| 2019  | 50                                      | 51                              | 29     |
| 2020  | 12                                      | 13                              | 16     |
| 2021  | 9                                       | 10                              | 10     |
| 2022  | 8                                       | 9                               | 7      |
| 2023  | 8                                       | 10                              | 9F     |
| 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 (and remain unchanged in the 2021 NDCTP). Decision 14-02-024 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 \$9.4 million in 2023.

## **Attachment 3**

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

|   | Remaining Project                   |                                      | 2019-2022                            |                   |                   | 2023                   |                                   |   |
|---|-------------------------------------|--------------------------------------|--------------------------------------|-------------------|-------------------|------------------------|-----------------------------------|---|
|   | 2018 NDCTP<br>2019-2033<br>(2018\$) | 2018 NDCTP<br>2019-2033<br>(Nominal) | 2018 NDCTP<br>2019-2022<br>(Nominal) | 2019-2022 Spent   | Variance          | Forecast 2023<br>Spent | Spent Plus 2023<br>Forecast Spent | (2019-2023)<br>Approved 2018<br>NDCTP (Nominal) |
| <b>General Staffing (Excludes Caisson)</b>                          | <b>13,170,667</b>                   | <b>13,679,833</b>                    | <b>13,679,833</b>                    | <b>12,219,016</b> | <b>1,460,817</b>  | -                      | <b>12,219,016</b>                 | <b>13,679,833</b>                               |
| 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                            | 9,582,468         | (278,577)         |                        | 9,582,468                         | 9,303,891                                       |
| Severence   | 424,106                             | 435,961                              | 435,961                              |                   | 435,961           |                        |                                   | 435,961   |
| <b>Remainder of Plant Systems</b>                                   | -                                   | -                                    | -                                    | -                 | -                 | -                      | -                                 | -   |
| <b>Specific Project Costs (Excludes Disposal / Caisson / Can.)</b>  | -                                   | -                                    | -                                    | -                 | -                 | -                      | -                                 | -   |
| <b>Waste Disposal (Excludes Caisson / Canals)</b>                   | -                                   | -                                    | -                                    | -                 | -                 | -                      | -                                 | -   |
| <b>Small Value Contracts</b>  | <b>21,070,030</b>                   | <b>21,777,860</b>                    | <b>21,655,187</b>                    | <b>18,036,270</b> | <b>3,618,916</b>  | -                      | <b>18,036,270</b>                 | <b>21,777,860</b>                               |
| 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                            | 5,739,098                            | 2,824,457         | 2,914,641         |                        | 2,824,457                         | 5,861,771                                       |
| 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                                       |
| <b>Spent Fuel Management</b>  | <b>148,275,144</b>                  | <b>189,616,545</b>                   | <b>47,854,200</b>                    | <b>30,670,487</b> | <b>17,183,713</b> | <b>9,439,276</b>       | <b>40,109,763</b>                 | <b>57,408,082</b>                               |
| Security (PG&E)   | 98,114,443                          | 120,956,434                          | 32,741,253                           | 22,350,166        | 10,391,087        | 5,866,720              | 28,216,886                        | 40,484,402                                      |
| ISFSI O&M   | 8,913,090                           | 11,210,349                           | 3,039,067                            | 2,309,827         | 729,240           | 829,460                | 3,139,287                         | 3,746,803                                       |
| NRC Fees  | 4,418,035                           | 5,635,288                            | 1,283,842                            | 703,679           | 580,163           | 390,238                | 1,093,918                         | 1,602,323                                       |
| ISFSI Staffing / Engineering / Specialty Contracts                  | 8,450,640                           | 10,011,118                           | 4,088,432                            | 1,396,110         | 2,692,322         | 606,222                | 2,002,332                         | 4,734,942                                       |
| ISFSI Infrastructure Expenses                                       | 9,342,738                           | 10,842,094                           | 6,701,605                            | 3,910,705         | 2,790,900         | 1,746,635              | 5,657,340                         | 6,839,613                                       |
| ISFSI Removal   | 15,368,552                          | 25,435,773                           | -                                    | -                 | -                 | -                      | -                                 | -   |
| Transfer to DOE   | 3,667,446                           | 5,525,490                            | -                                    | -                 | -                 | -                      | -                                 | -   |
| <b>Caisson</b>  | -                                   | -                                    | -                                    | -                 | -                 | -                      | -                                 | -   |
| <b>Canal Remediation</b>  | -                                   | -                                    | -                                    | -                 | -                 | -                      | -                                 | -   |
| <b>Common Site Support - Caisson and Canals</b>                     | -                                   | -                                    | -                                    | -                 | -                 | -                      | -                                 | -   |
| <b>EPC Services (including Quality Training)</b>                    | -                                   | -                                    | -                                    | -                 | -                 | -                      | -                                 | -   |
| <b>Costs Closed out in 2018 NDCTP included in 2019 SAP accounts</b> | -                                   | -                                    | -                                    | <b>1,081,195</b>  |                   |                        | <b>1,081,195</b>                  |   |
| <b>TOTAL</b>  | <b>182,515,841</b>                  | <b>225,074,238</b>                   | <b>83,189,220</b>                    | <b>62,006,969</b> | <b>22,263,446</b> | <b>9,439,276</b>       | <b>71,446,244</b>                 | <b>92,865,775</b>                               |
| Advice Letter Approvals   |                                     |                                      |                                      | 44,436,670        |                   |                        |                                   |   |
| Difference (Carry Over from previous period)                        |                                     |                                      |                                      | 20,203,793        |                   | 2,633,495              |                                   |   |
| <b>Variance (between Advice Letter and Amount Spent/Forecast)</b>   |                                     |                                      |                                      | <b>2,633,495</b>  |                   | <b>6,805,781</b>       |                                   |   |

# **Attachment 4**

Annual Cash Flow

## 2018 NDCTP Cash Flow

| <b>(2018\$)</b> |                       |                                  |                         |                             |                               |                      |
|-----------------|-----------------------|----------------------------------|-------------------------|-----------------------------|-------------------------------|----------------------|
| <b>Year</b>     | <b>PG&amp;E Labor</b> | <b>Equipment &amp; Materials</b> | <b>Contractor Labor</b> | <b>Process &amp; Burial</b> | <b>Other</b>                  | <b>TOTAL</b>         |
| 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            | 5,309,775             | 53,058                           | 491,369                 | -                           | 395,148                       | 6,249,351            |
| 2023            | 4,356,284             | -                                | 3,232,420               | -                           | 437,333                       | 8,026,037            |
| 2024            | 6,275,300             |                                  | 2,453,747               |                             | 2,068,438                     | 10,797,485           |
| 2025            | 6,275,300             |                                  | 2,453,747               |                             | 2,068,438                     | 10,797,485           |
| 2026            | 6,275,300             |                                  | 3,058,148               |                             | 2,179,846                     | 11,513,294           |
| 2027            | 6,275,300             |                                  | 2,520,286               |                             | 2,074,835                     | 10,870,421           |
| 2028            | 6,275,300             |                                  | 2,487,017               |                             | 2,071,637                     | 10,833,953           |
| 2029            | 6,275,300             |                                  | 2,487,017               |                             | 2,071,637                     | 10,833,953           |
| 2030            | 6,275,300             |                                  | 2,487,017               |                             | 2,071,637                     | 10,833,953           |
| 2031            | 6,275,300             |                                  | 2,500,597               |                             | 2,093,024                     | 10,868,921           |
| 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           |
| <b>TOTAL</b>    | <b>85,429,021</b>     | <b>426,237</b>                   | <b>68,600,060</b>       | <b>4,368,692</b>            | <b>26,012,139</b>             | <b>184,836,149</b>   |
|                 |                       |                                  |                         |                             | Spent Prior to 2019           | 926,640,811          |
|                 |                       |                                  |                         |                             | <b>Total Project Forecast</b> | <b>1,111,476,960</b> |

| <b>(Nominal \$)</b> |                       |                                  |                         |                             |                               |                      |
|---------------------|-----------------------|----------------------------------|-------------------------|-----------------------------|-------------------------------|----------------------|
| <b>Year</b>         | <b>PG&amp;E Labor</b> | <b>Equipment &amp; Materials</b> | <b>Contractor Labor</b> | <b>Process &amp; Burial</b> | <b>Other</b>                  | <b>TOTAL</b>         |
| 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                | 6,046,203             | 58,524                           | 561,822                 | -                           | 436,339                       | 7,102,887            |
| 2023                | 5,123,834             |                                  | 3,821,279               |                             | 494,162                       | 9,439,275            |
| 2024                | 7,285,475             | -                                | 2,730,233               | -                           | 1,869,252                     | 11,884,959           |
| 2025                | 7,529,451             | -                                | 2,824,657               | -                           | 1,914,637                     | 12,268,745           |
| 2026                | 7,781,479             | -                                | 3,709,316               | -                           | 2,094,506                     | 13,585,300           |
| 2027                | 8,041,823             | -                                | 3,105,122               | -                           | 2,014,192                     | 13,161,137           |
| 2028                | 8,310,759             | -                                | 3,158,590               | -                           | 2,057,060                     | 13,526,409           |
| 2029                | 8,588,570             | -                                | 3,258,272               | -                           | 2,104,359                     | 13,951,201           |
| 2030                | 8,875,548             | -                                | 3,358,672               | -                           | 2,151,913                     | 14,386,134           |
| 2031                | 9,171,997             | -                                | 3,482,692               | -                           | 2,228,182                     | 14,882,871           |
| 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           |
| <b>TOTAL</b>        | <b>106,995,129</b>    | <b>449,276</b>                   | <b>84,079,057</b>       | <b>8,474,175</b>            | <b>27,396,909</b>             | <b>227,394,547</b>   |
|                     |                       |                                  |                         |                             | Spent Prior to 2019           | 926,640,811          |
|                     |                       |                                  |                         |                             | <b>Total Project Forecast</b> | <b>1,154,035,357</b> |

# **Attachment 5**

Comparison of Actual to Forecast Project Schedule

| HBPP Unit 3 Comparison Forecast to Actual Schedule            |   |                               |                               |   |  |
|---|---|-------------------------------|-------------------------------|---|--|
| Activity Name   | 2015 NDCTP <sup>1</sup><br>Expected Start | 2015 NDCTP<br>Expected Finish | Most Recent<br>Forecast Start | Most Recent<br>Forecast Finish <sup>2</sup> | Explanation of Major Changes   |
| <b>1) RPV Equipment &amp; System Removal</b>                  |   |                               |                               |   |  |
| 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                                 |  |
| <b>2) Balance of Equipment &amp; System Removals</b>          |   |                               |                               |   |  |
| 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                                 |  |
| <b>3) Demolition &amp; Civil Works</b>                        |   |                               |                               |   |  |
| 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                                 |  |
| <b>4) Remediation Restoration &amp; Closeout</b>              |   |                               |                               |   |  |
| 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 |
| 10 CFR Part 50 License Termination                            | N/A                                       | N/A                           | N/A                           | 18-Nov-21A                                  | Operating license on 10/21/21. The NRC terminated the Part 50 license on 11/18/21.   |
| <b>5) Spent Fuel Management (10 CFR Part 72)</b>              |   |                               |                               |   |  |
| 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 <sup>1</sup>        | 2009-2011 | 2012-2014 | 2015-2018 | 2019-2020 | 2021-2022         |
|---|-----------|-----------|-----------|-----------|-------------------|
| 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   | -         | -         | -         | -         | 14,418,012        |
| Security (PG&E)   |           |           |           |           | 11,084,609        |
| ISFSI O&M   |           |           |           |           | 1,458,159         |
| NRC Fees  |           |           |           |           | 422,050           |
| ISFSI Staffing / Engineering / Specialty Contracts                                      |           |           |           |           | 1,115,643         |
| ISFSI Infrastructure Expenses   |           |           |           |           | 337,551           |
| Transfer to DOE   |           |           |           | -         | -                 |
| ISFSI Removal   |           |           |           | -         | -                 |
| Caisson   | -         | -         | -         | -         |                   |
| Canal Remediation   | -         | -         | -         | -         |                   |
| Common Site Support - Caisson and Canals  | -         | -         | -         | -         |                   |
| EPC Services (including Quality Training)   | -         | -         | -         | -         |                   |
| EPC Services  |           |           |           | -         |                   |
| <b>Total Decommissioning Costs Not Reviewed For Prudency Prior to 2021 NDCTP Filing</b> | <b>-</b>  | <b>-</b>  | <b>-</b>  | <b>-</b>  | <b>14,418,012</b> |

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<br>Prior to<br>November 2007 | November 2007 -<br>January 2014<br>Disbursement<br>Authorizations <sup>1</sup> | 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         |
| <b>Subtotal</b>   | <b>69,319</b>                               | <b>431,786</b>   | <b>501,106</b> |
| 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)      |
| <b>Subtotal</b>   |   |  | <b>276,363</b> |
| AL Disbursement Authorizations Post 2015 NDCTP Decision             |   |  |                |
|   | (March 2017 - May 2022)                     |  | 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   |   |  | 73,287         |
| 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                          |   |  | (114,615)      |
| <b>Subtotal</b>   |   |  | <b>213,812</b> |
| <b>Cumulative Advice Letter Requests Total</b>                      |   |  | <b>991,281</b> |
| <b>Amount Spent through 2022</b>                                    |   |  | <b>988,648</b> |
| <b>Delta</b>  |   |  | <b>2,633</b>   |

<sup>1</sup>Reflects 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 Blaising 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  
Downey Brand LLP  
Dish Wireless L.L.C.

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

GenOn Energy, Inc.  
Green Power Institute  
Hanna & Morton  
ICF

iCommLaw  
International Power Technology  
Intertie

Intestate Gas Services, Inc.

Johnston, Kevin  
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.

Resource Innovations

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  
Stoel Rives LLP

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