

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



Pacific Gas & Electric Company
GAS (Corp ID 39)
Status of Advice Letter 4814G/7047E
As of February 7, 2024

Subject: PG&E's 2024-2027 True-Up Advice Letter in Compliance with Decision 21-05-031, Decision 23-06-055, and Decision 23-08-005

Division Assigned: Energy

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From: Energy Division PAL Coordinator

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October 16, 2023

Advice 4814-G/7047-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: PG&E's 2024–2027 True-Up Advice Letter in Compliance with Decision 21-05-031, Decision 23-06-055, and Decision 23-08-005

I. Purpose

Pacific Gas and Electric Company (PG&E) submits its 2024–2027 energy efficiency (EE) portfolio budget (2024-27 EE Budget) true-up Tier 2 advice letter in compliance with Decision (D.) 21-05-031, *Assessment of Energy Efficiency Potential and Goals Modification of Portfolio approval and Oversight Process*,¹ D.23-06-055, *Decision Authorizing Energy Efficiency Portfolios for 2024–2027 and Business Plans for 2024-2031*,² and D.23-08-005, *Decision Adopting Energy Efficiency Goals for 2024-2035*.³

PG&E requests that the Commission approve its 2024–2027 true-up advice letter (TUAL) spending budget of \$941,266,718 and cost recovery budget of \$1,233,529,577 effective January 1, 2024.⁴ PG&E additionally requests that the Commission approve the forecasted electric/gas splits for cost recovery allocations as indicated in Tables 20 and 21, effective January 1, 2024.

II. Background

A. Regulatory Requirements

The true-up advice letter requirement was first adopted in D.21-05-031 with the requirement that each year on September 1, in the odd years when the energy efficiency potential and goals have been adopted by the Commission, each energy efficiency portfolio administrator (PA) shall file either a portfolio true-up (prior to the start of a four-year portfolio) or a mid-cycle review (in year two of a four-year portfolio) Tier 2 advice letter adjusting technical inputs, forecasts, and portfolio to account for the changes in energy efficiency potential and goals.⁵ Following approval of the 2024–2027 EE portfolios

¹ D.21-05-031, Ordering Paragraph (OP) 10.

² D.23-06-055, OP 1 and 37

³ D.23-05-012, OP 3.

⁴ Section IV.I of this advice letter provides more detail on PG&E's cost recovery request.

⁵ D.21-05-031, OP 10.

and 2024–2031 PA Business Plans, D.23-06-055 also noted that the “True-Up advice letter identified in Decision 21-05-031 as due on September 1, 2023 shall be due instead no later than 60 days after the Commission issues a decision updating the energy efficiency potential and goals in Rulemaking 13-11-005.”⁶ Pursuant to the issuance of D.23-08-005 on August 16, 2023, the TUAL is being submitted on October 16, 2023.

B. Filing Requirements

D.21-05-031⁷ requires each PA’s TUAL to meet the following criteria:

- The PA’s portfolio must meet the total system benefit (TSB) goal for the four years, adjusted by the updated TSB goal for the remaining period of the portfolio.
- The portfolio must meet or exceed a forecasted TRC ratio of 1.0 for the resource acquisition segment of the portfolio (with the exception of RENS).
- The equity and market support segments of the portfolio, combined, must not exceed 30% of the total budget (with the exception of RENS).
- For investor-owned utilities (IOUs): the statewide and third-party contribution percentage requirements must be met.
- The advice letters also must include a report on the progress against metrics relevant to each segment of the portfolio.

D.23-06-055⁸ provided guidance that the True-Up advice letter should also include updates based on the following:

- Guidance in D.21-05-031, such as adjustments to forecasts stemming from updated inputs, including TSB goals, avoided cost calculator updates, new database for energy efficiency (DEER) values, etc.
- Updated statewide allocations and resulting budgets (within the authorized cap) and savings forecasts.
- Updates or corrections to program segmentation.
- The IOU PAs shall reflect the statewide contribution changes included in Tables 1, 2, and 3 of D.23-06-055 in their TUALs due in 2023.⁹
- The TUAL originally identified as due on September 1, 2023¹⁰, shall be due instead no later than 60 days after the Commission issues a decision updating the energy efficiency potential and goals in Rulemaking 13-11-005.¹¹

⁶ D.23-06-055, OP 37.

⁷ D.21-05-031, pp. 42–43.

⁸ D.23-06-055, p. 97.

⁹ Ibid., OP 1.

¹⁰ D.21-05-031, OP 10.

¹¹ D.23-06-055, OP 37.

- Requiring all non-REN PAs (IOUs plus MCE) to make available solicitations using market access approaches for residential and commercial downstream opportunities in their territories by no later than July 1, 2024.¹²

D.23-08-005 also required the IOUs to use the TUAL to adjust their Codes and Standards (C&S) budgets to align with their C&S potential in the final 2023 potential study.¹³

C. Contents of this Filing

PG&E's TUAL is organized as follows:

- Discussion
 - A. Portfolio Overview
 - B. Summary of Forecasted Portfolio Impacts
- Portfolio Details
 - A. Total System Benefit
 - B. Cost Effectiveness
 - C. Statewide and Third-Party Compliance
 - D. Market Support and Equity Segment Compliance
 - E. Non-Advocacy C&S Budget
 - F. Segment Metrics
 - G. Program Changes
 - H. Program Closures
 - I. Evaluation, Measurement, and Verification (EM&V)
 - J. Cost Recovery
 - K. California Energy Data and Reporting System (CEDARS) Discrepancies

In addition to the information above, PG&E's 2024–2027 TUAL includes the following attachments:

- Attachment A – Appendices¹⁴
- Attachment B – CEDARS Filing Confirmation

III. Discussion

A. Portfolio Overview

i. Recent CPUC Decisions Impacting EE Portfolios

a. Natural Gas Incentives Phase Out Decision (D.23-04-035)

¹² D.23-06-055, OP 26.

¹³ D.23-08-005, OP 3.

¹⁴ Appendix tables include the 2024–2027 Program Budgets and Targets and Caps and Targets tables. The format of these tables reflects input and agreement by EE PAs and CPUC Staff.

The *Decision Addressing Codes and Standards Subprograms and Budgets and Staff Proposal on Reducing Ratepayer-Funded Incentives for Gas Energy Efficiency Measures* (D.23-04-035) included the following orders, which are reflected in PG&E's TUAL:

- Removal of ratepayer-funded incentives for “non-exempt, non–cost effective gas measures for new construction projects with no existing gas line, and for new construction projects with an existing gas line if gas usage will materially increase.”¹⁵
- Funding for market studies on (a) infrastructure costs needed for electrification for low-income customers; (b) the impact of incentives on customer fuel substitution for market rate customers; and (c) the impact of incentives on customer fuel substitution for low-income customers;¹⁶ and
- Ensuring a 70% cap on non-advocacy C&S subprogram budgets as a part of the total C&S budget.¹⁷

b. Approval of the 2024–2027 EE Portfolios (D.23-06-055)

D.23-06-055 approved PG&E's application for its energy efficiency portfolio for 2024–2027 and its business plan for 2024–2031. This TUAL reflects the following notable changes based on D.23-06-055 in comparison to PG&E's filed Portfolio Plan for 2024–2027:

- Updated statewide program budget contribution changes that lower PG&E's contribution to all statewide programs, except for C&S Advocacy Programs;¹⁸
- Modifications to TSB, cost effectiveness, and annual budget forecasts;
- Funding for PG&E's share of \$1 million for Commission staff for portfolio oversight consulting and technical support;¹⁹
- Funding for PG&E's share of \$500,000 of EM&V funds for a non-energy benefits study;²⁰
- Funding for PG&E's share of \$1 million of EM&V funds for a study to set goals for the market support and equity segment indicators;²¹
- Funding for a placeholder for a third-party solicited program that uses market access approaches for residential and commercial downstream opportunities;²² and
- Funding for a placeholder for a multi-Distributed Energy Resources (multi-DER) program with non-event-based load shifting projects.²³

¹⁵ D.23-04-035, p 2.

¹⁶ D.23-04-035, OP 7.

¹⁷ Ibid., OP 8.

¹⁸ D.23-06-055, OP 1. Contribution percentages for Codes and Standards Advocacy Programs are addressed in D.23-08-005, OP 3.

¹⁹ Ibid., OP 9.

²⁰ Ibid., OP 17.

²¹ Ibid., OP 25.

²² Ibid., OP 26.

²³ Ibid., OP 29.

c. Adoption of EE Goals for 2024–2035 (D.23-08-005)

D.23-08-005 adopted updated TSB and energy savings goals for ratepayer-funded energy efficiency portfolios for 2024–2035. To align with the new portfolio structure adopted in D.21-05-031, the goals for each four-year period between 2024 and 2035 are set cumulatively (2024–2027, 2028–2031, and 2032–2035).²⁴ Savings from C&S programs continue to be expressed in electric energy (gigawatt-hours, or GWh), peak demand (megawatts, or MW), and gas energy (million therms, or MMTherms) reductions.²⁵ PG&E discusses forecasted TSB and savings goal attainment for 2024–2027 in Section IV below.

D.23-08-005 also ordered C&S Statewide Advocacy Program budget allocations to be aligned with the distribution methodology for C&S potential and goals established by the final 2023 Potential and Goals Study. PG&E's TUAL forecast reflects this direction.

d. Clean Energy Financing (D.23-08-026)

The *Decision on Clean Energy Financing Proposals* (D.23-08-026), which approved the PG&E Clean Energy Financing Options (CEFO) Platform, allows for the use of EE funds to expand the On-Bill Financing (OBF) program. However, no additional funding for PG&E was requested (or consequently approved via the CEFO Decision) for this purpose. PG&E is in the process of determining implementation of an expanded OBF program to include non-EE projects, and this TUAL forecast reflects an assumption that the current loan pool addition request of \$10 million is appropriate at this time.

ii. Portfolio Administrator Costs

PG&E's Portfolio Administrator (PA) costs for the TUAL include both portfolio administration costs and program implementation costs.²⁶ The PA cost forecast approach for the TUAL aligns with the approach described in PG&E's Prepared Testimony, Exhibit 2, Chapter 2²⁷ with two notable changes. The first change is to comply with direction in D.23-02-002: (1) the resource acquisition (RA) segment TRC calculation includes portfolio administration costs at the segment level, (2) portfolio support PA costs²⁸ are provided at the segment level, and (3) certain costs within functional group categories are

²⁴ D.23-18-012, p.14.

²⁵ Ibid., pp.14–15.

²⁶ Portfolio administration costs and program implementation costs were defined in the Natural Resources Defense Council, Motion (April 24, 2020), Attachment A, California Energy Efficiency Coordinating Committee (CAEECC) Proposal at p. 8, and adopted in D.21-05-031, Conclusions of Law (CoL) 18.

²⁷ PG&E's Energy Efficiency 2024–2027 Portfolio Plan Prepared Testimony, Exhibit 2, Chapter, 2, pp. 2-18 through 2-26.

²⁸ As PG&E noted in its Prepared Testimony Exhibit 2, Chapter 2, p. 2-20, PG&E interprets Portfolio Support PA costs as synonymous with "Portfolio Administration" in footnote 22, above.

reclassified to the “Utility Administrative Costs” cost category from Direct Implementation Non-Incentive (DINI).²⁹

The second change is that PG&E’s forecasted PA costs now exclude benefit burdens, payroll taxes, IT device services, building services, and operational management and support (collectively referred to hereinafter as “GRC overheads”), in alignment with PG&E’s 2023 General Rate Case (GRC) proposal. In PG&E’s 2023 GRC Phase I application (Application [A.] 21-06-021), Section “C. Cost Model Update” Errata Testimony, PG&E proposed that, starting in 2023, “GT&S [Gas Transmission and Storage] and all other balancing account expense orders will only receive overhead costs in the same manner as GRC expense orders”. This means that EE’s GRC Overheads would no longer be recovered through EE and instead would be recovered through the GRC.

Although PG&E’s 2023 GRC Phase I application is pending CPUC approval at the time of preparing this TUAL filing, PG&E reduced its TUAL spending budget request and cost recovery by the estimated budget impact of these overheads, which ranges from \$9.2 million to \$9.7 million annually from 2024–2027.³⁰ An estimate of these overheads will continue to be included in PG&E’s CEDARS upload as separate program IDs³¹ for purposes of cost-effectiveness calculations.

iii. Forecast Approach

PG&E’s TUAL forecast aligns with its Portfolio Plan forecast by continuing to include benefit and cost forecasts based on three sources: (1) third-party implementers who provided the initial forecasts for their contracted programs, (2) lead IOUs who provided forecasts for their respective statewide programs, exclusive of their PA costs, and (3) internal PG&E resources who developed the forecasts for PG&E-implemented programs, for prospective new programs, and for PA costs.

²⁹ D.23-02-002, pp. 36–37.

³⁰ PG&E may file a supplemental advice letter to update if necessary.

³¹ PGE_CS_GRC_Overheads, PGE_Equity_GRC_Overheads, PGE_MS_GRC_Overheads, and PGE_RA_GRC_Overheads.

Table 1: Forecast Approach by Program Type

Forecast Approach	Program Types
Implementer-Generated Forecast, subject to PG&E QC	Existing/Continuing Local Programs
	Existing/Continuing SW Programs – PG&E Lead
Forecast supplied to PG&E by Lead PA	Existing/Continuing SW Programs – other PA Lead
	New SW Programs – other PA Lead
Placeholder Forecast developed by PG&E Staff	Future Local Programs

Where PG&E's TUAL forecast relied on an implementer-generated program forecast, PG&E reviewed that forecast for reasonableness and for adherence with CPUC requirements before including it in the portfolio forecast. In cases where a statewide program forecast was provided to PG&E by the lead PA, PG&E relied on the expertise of that lead PA in preparing the forecast for that program.

Following PG&E's Portfolio Plan methodology, the inclusion of a program forecast for any program IDs beyond the current implementation party's contract termination date does not guarantee that the party's current contract will be extended. PG&E will continue to evaluate vendor performance and determine the appropriate action.

iv. Portfolio Changes

This section explains changes PG&E has made to its portfolio since filing its 2024–2027 Portfolio Plan in February 2022 that were not a direct result of CPUC guidance from the Decisions included in Section III.A.i.

a. Performance Management Changes

PG&E outlined its portfolio performance management approach in its Prepared Testimony.³² Since its February 2022 filing, PG&E has implemented its performance and contract management strategies in which third-party implementation engagements that are working successfully have been preserved and rewarded, and corrective direction in the form of remediation plans or budget reductions for programs that are underdelivering. As directed in D.16-08-019 and reaffirmed in D.18-01-004 and D.18-05-041,³³ PG&E

³² PG&E Prepared Testimony, Exhibit 2, Chapter 5.

³³ D.16-08-019, p. 111, OP 10; D.18-01-004, p. 61, OP 1; and D.18-05-041, pp. 182–183, OP 4.

forecasts that at least 60 percent of its total portfolio budget will be allocated to programs that meet the updated third-party definition³⁴ for 2024–2027.

PG&E conducted third-party solicitations for local programs and statewide programs for which it was the assigned lead program administrator,³⁵ including its primary solicitation that was a single solicitation across five sectors – Residential, Commercial, Industrial, Agricultural, and Public. This refreshed portfolio of programs includes 36 new programs awarded since 2018. At the time of the February 2022 filing, some programs had only been in market for 12–18 months, and some programs’ ability to reach “steady state” were delayed due to the impacts of the COVID-19 pandemic in 2020 and 2021, therefore PG&E’s performance management of the newly solicited programs was limited. Below are some of the results from PG&E’s performance management, which are reflected in PG&E’s TUAL forecast.

Residential Programs:

Residential Behavior Program

PG&E’s TUAL forecast reflects an increase in budget for the Residential Behavior Program (PGE_Res_002d) to enable the continued delivery of cost-effective avoided cost benefits. The increase in forecasted budget also reflects strategic additions to the program such as Peak Day Alerts (PDA), and expanding Bill Forecast Alerts (BFA) and Time-of-Use (TOU) Rate Coaching.³⁶ With PDA, PG&E is testing cost-effective ways to shift load and reduce peak demand without the use of financial incentives. PG&E’s TUAL forecast for this program includes TSB from a variety of program elements, including PDA, BFA, and TOU Rate Coaching.

Multifamily Program

PG&E closed the Multifamily Program (PGE_Res_003) on June 30, 2023, due to ongoing challenges in meeting contract goals and a minimal lead pipeline within the target customer base. PG&E submitted a Tier 2 advice letter on May 15, 2023,³⁷ which was approved by a CPUC disposition letter effective June 14, 2023.

Non-Residential Programs

PG&E’s TUAL forecast reflects budget reductions for some non-residential programs as a result of PG&E’s evaluations of program performance management strategies as outlined in its Prepared Testimony.³⁸ Budgets were reduced for the following programs:

³⁴ D.16-08-019, p. 111, OP 10. Third-party definition: “To be designated as ‘third party,’ the program must be proposed, designed, implemented, and delivered by non-utility personnel under contract to a utility program administrator.”

³⁵ D.18-05-041, p. 188, OP 26, and pp. 91–92, Table 3.

³⁶ Peak Day Alerts, Bill Forecast Alerts, and Time-of-Use Rate Coaching are the market names for Residential Behavior Program products.

³⁷ PG&E Advice 4754-G/6943-E, May 15, 2023.

³⁸ PG&E Prepared Testimony, Exhibit 2, Chapter 5, pp. 5-5 to 5-7.

Petroleum and Chemical Efficiency Program (PGE_Ind_002), Grocery Efficiency Program (PGE_Com_001), Laboratory Performance Efficiency Program (PGE_Com_002), High Tech and Bio Tech Efficiency Program (PGE_Com_004), and Healthcare Efficiency Program (PGE_Com_005).

b. Summer Reliability

PG&E continues its commitment to work with the Commission and stakeholders to mitigate the risk of capacity shortages through the pursuit of peak demand reduction, including net peak demand reduction, permanent load reduction, and other advanced load management activities. In response to the Governor's Proclamation from July 2021³⁹ and D.21-12-011, PG&E launched a Market Access Program (MAP) in June 2022. MAP was funded via incremental EE funds for program years 2022 and 2023 requested via Tier 2 advice letters.⁴⁰

In September 2023, PG&E released a solicitation for a Summer Reliability Platform Administrator (SRPA) requesting market access approaches for residential and commercial customer sectors, with a target launch by the summer of 2024. Unlike MAP, which was funded through funds incremental to the EE portfolio, this program will be funded through PG&E's general energy efficiency portfolio, therefore PG&E includes a placeholder program ID in its TUAL forecast (PGE_Com_006). Also, unlike MAP, which was incremental to the EE portfolio and not included in PG&E's accomplishments toward the goal, PG&E intends for the SRPA program to deliver cost-effective avoided cost benefits; the TUAL forecast reflects this in PG&E's EE spending and cost recovery budget requests and in its TSB and cost-effectiveness forecasts. Given SRPA is in an ongoing solicitation at the time of this filing, the SRPA forecast in the TUAL was created by PG&E based on information from MAP.

c. Electrification Pilots

In Prepared Testimony, PG&E described its multi-pronged approach to building decarbonization that included placeholders for several programs related to advancing electrification.⁴¹ This included placeholders for Zonal Electrification (PGE_Res_ZE and PGE_Com_ZE) and Residential Equity Electrification (PGE_Res_Equity) programs. Since the filing of PG&E's EE Application, PG&E decided to pursue the Zonal Equity Electrification and Residential Equity Electrification programs as pilots and launched third-party solicitations for them in 2023. PG&E's Portfolio Plan assumed program launches prior to 2024; however, these pilot programs may not launch until 2024, therefore PG&E's TUAL forecast reflects this timing delay.

³⁹ Proclamation of a State of Emergency, July 30, 2021, available at: <https://www.gov.ca.gov/wp-content/uploads/2021/07/Energy-Emergency-Proc-7-30-21.pdf>

⁴⁰ PG&E Advice 4572-G/6498-E submitted on February 7, 2022, PG&E Advice 4681-G/6762-E submitted on November 15, 2022, and PG&E Advice 6934-E submitted on May 5, 2023.

⁴¹ PG&E Prepared Testimony, Exhibit 1, Chapter 1, pp. 1-23 to 1-28.

d. Support for Multi-Distributed Energy Resources (Multi-DER) Programs

PG&E appreciated the recognition in D.23-06-055⁴² of its policy proposal from its Prepared Testimony⁴³ to update IDSM rules to support comprehensive load management and enable greater program integration.

In Appendix Table A2, which details portfolio caps and targets and projected expenditures against them, PG&E includes expenditure projections for four placeholder program IDs⁴⁴ that may be applicable to the “EE-IDSM” cap allowed in D.23-06-055.⁴⁵ PG&E has attributed 75% of the program costs toward the “EE-IDSM” cap as a preliminary estimate in recognition that only partial costs from these programs would be used “as an operational complement to potential capital funding from other sources.”⁴⁶ PG&E has launched a solicitation for the Residential Load Management program and intends to launch solicitations for a multi-DER pilot program and resiliency programs. PG&E intends to file a Tier 3 advice letter⁴⁷ proposing processes to implement programs such as these that may leverage non-EE funding sources in combination with EE funding. Given PG&E’s intent to solicit for third-party qualified programs, PG&E does not yet know the program designs, including which non-EE DERs may be proposed as part of the successful program designs. Therefore, it is premature for PG&E to provide additional program-level detail in this TUAL beyond the placeholder budget amounts.

e. PG&E-run Core Programs

PG&E’s TUAL forecast reflects its intent to continue to reduce the forecasted budget for its IOU-run core programs⁴⁸ to reflect completion of legacy projects and new project development transitioning to the third-party programs.

B. Summary of Forecasted Portfolio Impacts

This section provides PG&E’s summary of its forecasted portfolio impacts, including summary tables for its forecast budgets, Total System Benefit (TSB) and Codes and Standards (C&S) savings as requested in the Energy Division’s final TUAL templates⁴⁹ that align with Commission guidance regarding TUAL updates relative to the approved portfolio budgets.

⁴² D.23-06-055, p.77.

⁴³ PG&E Prepared Testimony, Exhibit 1, Chapter 3, pp. 3-5 to 3-7.

⁴⁴ PGE_Res_LoadMgt, PGE_Res_Resiliency, PGE_Pub_Resiliency, and PGE_Com_008.

⁴⁵ D.23-06-055, OP 29, p. 128.

⁴⁶ D. 23-06-055, p.80.

⁴⁷ D. 23-06-055, OP 28.

⁴⁸ PGE21011, PGE21012, PGE21021, PGE21022, PGE21031, and PGE21032.

⁴⁹ *Final True-Up Advice Letter template for tables and appendices. Revised.*, posted to the CPUC’s California Energy Data and Reporting System (CEDARS) Documents area on September 19, 2023. <https://cedars.sound-data.com/documents/standalone/list/>

Overall, as shown in Table 4 & Table 5 below:

- PG&E forecasts achieving 136% of the cumulative TSB goal for 2024–2027.
- PG&E forecasts achieving 101% of the C&S cumulative GWh goal for 2024–2027.
- PG&E forecasts achieving 111% of the C&S cumulative MW goal for 2024–2027.
- PG&E forecasts achieving 102% of the C&S cumulative MMTherm goal for 2024–2027.

i. Portfolio Budget Summary

PG&E proposes a total portfolio budget for 2024–2027 of \$941,266,718, inclusive of PG&E and CPUC EM&V, and ED Portfolio Oversight.⁵⁰ This budget is below the Commission’s approved 2024–2027 portfolio budget cap of \$1,004,140,954.

Table 2 provides an overview of PG&E’s forecasted annual and cumulative budget by portfolio segment. The total portfolio budget subtotal in line 6 includes EM&V but excludes the amount requested for the On-Bill Financing (OBF) loan pool addition and ED Portfolio Oversight. This total portfolio budget subtotal is used as the denominator to calculate the percentage of PG&E’s portfolio for the 60 percent third-party outsourcing compliance target,⁵¹ the 20 percent minimum threshold for statewide programs,⁵² and the 30 percent market support and equity segment budget cap.⁵³ As noted here in Table 2 and again in Table 8, PG&E forecasts 26.3 percent of its total portfolio budget in the market support and equity segments.

⁵⁰ Per D.23-06-055, p. 121, the Commission requires IOU PAs to “make available to Commission staff \$1 million annually in reimbursable funding for purposes of portfolio oversight consulting and technical support, in the same manner as evaluation, measurement, and verification funding is currently budgeted.”

⁵¹ D.16-08-019, p. 111, OP 10; D.18-01-004, p. 61, OP 1; and D.18-05-041, pp. 182–183, OP 4.

⁵² D.23-06-055, CoL 4, p.111.

⁵³ D.21-05-031, OP 4.

Table 2: Annual and Cumulative Budget

Line	Segment	PY 2024	PY 2025	PY 2026	PY 2027	Cumulative
1	Resource Acquisition	\$122,545,792	\$127,680,425	\$122,212,846	\$120,542,512	\$492,981,575
2	Market Support	\$42,446,448	\$48,989,648	\$50,512,165	\$49,839,055	\$191,787,317
3	Equity	\$8,120,061	\$12,377,309	\$12,422,990	\$12,435,129	\$45,355,489
4	Codes and Standards	\$32,545,036	\$34,251,735	\$33,944,619	\$31,541,447	\$132,282,836
5	EM&V (PA and ED)	\$8,985,722	\$9,720,797	\$9,545,526	\$9,348,256	\$37,600,301
6	Total Budget w/o OBF Loan Pool	\$214,643,059	\$233,019,913	\$228,638,146	\$223,706,400	\$900,007,518
7	Market Support and Equity, percent of Total Budget w/o OBF Loan Pool					26.3%
8	OBF Loan Pool	\$10,000,000	\$10,000,000	\$10,000,000	\$10,000,000	\$40,000,000
9	Budget excluding Portfolio Oversight	\$224,643,059	\$243,019,913	\$238,638,146	\$233,706,400	\$940,007,518
10	ED Portfolio Oversight	\$314,800	\$314,800	\$314,800	\$314,800	\$1,259,200
11	Total Budget	\$224,957,859	\$243,334,713	\$238,952,946	\$234,021,200	\$941,266,718
12	Approved Budget Cap^(a)					\$1,004,140,954

(a) PG&E's approved 2024–2027 budget cap, per D.23-06-055 Table 7 and OP 5.

Table 3 provides an overview of PG&E's total portfolio budget by sector and segment. The total portfolio budget included of \$902,407,217 in Table 3 does not include EM&V or ED Portfolio Oversight but includes the \$40 million addition to the OBF loan pool.

Table 3: Portfolio Budget by Sector and Segment (Cumulative for PY 2024–2027)

Line	Budget Category	Portfolio Segment				Total
		Resource Acquisition	Market Support	Equity	Codes & Standards	
1	Residential Sector	\$121,135,947	\$62,513,343	\$18,694,165	\$0	\$202,343,454
2	Commercial Sector	\$168,599,616	\$8,640,214	\$21,084,292	\$0	\$198,324,122
3	Industrial Sector	\$87,273,484	\$5,658,183	\$0	\$0	\$92,931,668
4	Agricultural Sector	\$39,720,466	\$2,571,548	\$0	\$0	\$42,292,015
5	Public Sector	\$38,333,710	\$28,787,861	\$0	\$0	\$67,121,572
6	Cross Cutting Sector					
7	Emerging Tech	\$0	\$25,888,555	\$0	\$0	\$25,888,555
8	WE&T	\$0	\$31,133,081	\$3,064,508	\$0	\$34,197,589
9	Finance	\$0	\$13,460,671	\$0	\$0	\$13,460,671
10	Codes & Standards	\$0	\$0	\$0	\$122,212,690	\$122,212,690
11	Portfolio Support	\$37,918,351	\$13,133,860	\$2,512,525	\$10,070,147	\$63,634,882
12	OBF Loan Pool					\$40,000,000
13	Program Subtotal^(a)	\$492,981,575	\$191,787,317	\$45,355,489	\$132,282,836	\$902,407,217

(a) This total does not include EM&V or ED Portfolio Oversight, which are outlined in Table 2

a. Program-Level Budget Variances

In Appendix Table A1, PG&E highlights program IDs that have a cumulative budget forecast for 2024–2027 that differs by 25 percent or greater between PG&E's TUAL and its Portfolio Plan. There are four primary drivers for budget variances between the two forecasts: (1) the PA cost methodology changes per direction in D.23-02-002 and described in Section III.A.ii, (2) reductions/increases in budget due to performance management, (3) reductions/increases due to statewide program budget contribution changes,⁵⁴ and (4) reductions/increases due to updated information such as awarded contracts and updated program designs. For each program ID, the respective drivers for the budget change are included in the change notes column (Column L) in Appendix Table A1.

⁵⁴ D.23-06-055, OP 1 and D.23-08-005, OP 3.

ii. Total System Benefit Forecast

Table 4 outlines the annual and cumulative TSB forecasted by segment. PG&E forecasts a cumulative TSB of \$1.16 billion for 2024–2027, exceeding the CPUC cumulative TSB goal of \$852.86 million.

Table 4: Annual and Cumulative Total System Benefit Forecast

Line	Segment	PY 2024	PY 2025	PY 2026	PY 2027	Cumulative
1	Resource Acquisition	\$297,207,783	\$227,894,979	\$231,980,023	\$215,317,401	\$972,400,187
2	Market Support	\$33,975,026	\$48,478,551	\$52,140,665	\$53,961,108	\$188,555,350
3	Equity	\$0	\$0	\$0	\$0	\$0
4	Total TSB Forecast	\$331,182,809	\$276,373,530	\$284,120,688	\$269,278,509	\$1,160,955,536
5	CPUC TSB Goal	\$211,992,628	\$211,860,888	\$212,385,721	\$216,621,492	\$852,860,729
6	<i>TSB Forecast / TSB Goal</i>	156%	130%	134%	124%	136%

iii. Codes and Standards Savings Forecast

PG&E forecasts achieving the cumulative GWh, MW, and MMTherm savings goals for Codes & Standards adopted in D.23-08-005 for 2024–2027,⁵⁵ as detailed in Table 5 below.

Table 5: Annual and Cumulative Codes and Standards Savings Forecast⁵⁶

Line	Savings Unit	PY 2024	PY 2025	PY 2026	PY 2027	Cumulative
1	GWh Forecast	1,116.1	1,045.5	976.5	888.3	4,026.5
2	GWh CPUC Goal ^(a)	1,071.2	1,008.4	987.2	909.8	3,976.6
3	<i>GWh Forecast/Goal</i>	104%	104%	99%	98%	101%
4	MW Forecast	210.7	220.7	198.2	181.5	811.1
5	MW CPUC Goal ^(a)	201.9	184.7	180.7	165.9	733.2
6	<i>MW Forecast/Goal</i>	104%	119%	110%	109%	111%
7	MMThm Forecast	21.7	21.2	18.2	15.3	76.3
8	MMThm CPUC Goal ^(a)	23.0	22.5	14.5	14.8	74.8
9	<i>MMThm Forecast/Goal</i>	94%	94%	125%	103%	102%

(a) C&S savings goals as adopted in D.23-08-005.

⁵⁵ D.23-08-005, Table 1.

⁵⁶ The gas C&S savings forecast is lower than the annual C&S target in 2024–2025 and the electric energy and peak demand C&S savings are lower than the C&S target in 2026–2027 based on the use of updated building construction data from the Opinion Dynamics (2022) PY 2016–2018 Building Codes Advocacy Program Evaluation (accessible here: https://pda.energydataweb.com/api/view/2809/C%26S-Report%20Del%2013A_Vol2_FINAL_04-20-23.pdf). The 2023 CPUC Potential and Goals Study used older assumptions with higher construction rates to develop savings potential upon which the annual targets were based.

IV. Energy Efficiency Portfolio Details

A. Total System Benefit

PG&E's Portfolio Plan forecasted a cumulative TSB of \$932,023,005 for 2024–2027. In this TUAL, PG&E forecasts a cumulative TSB of \$1.16 billion for 2024–2027 (see Table 4, above). This represents a 25% increase in the forecasted TSB relative to the Portfolio Plan. Likewise, the TSB forecasted in this TUAL exceeds the CPUC goal adopted for PG&E⁵⁷ by 36%. The increase in forecasted TSB relative to the Portfolio Plan is largely due to the vintage of Avoided Cost Calculator (ACC) used in the two forecasts. The Portfolio Plan used the 2021 ACC vintage while the TUAL uses the 2022 ACC vintage.⁵⁸

Program-Level Variances

In Appendix Table A1, PG&E highlights programs that have a cumulative TSB forecast for 2024–2027 that differs by 25 percent or greater between PG&E's TUAL and its Portfolio Plan. There are three primary drivers for TSB variances between the two forecasts: (1) the ACC vintage update between the filing of the Portfolio Plan and the TUAL, (2) reductions/increases in budget, and (3) reductions/increases in expected savings. For each program, the respective drivers for the TSB change are included in the change notes column (Column L) in Appendix Table A1.

B. Portfolio Cost-effectiveness

Table 6 provides the forecasted 2024–2027 ratios for Total Resource Cost (TRC), Program Administrator Cost (PAC), and Ratepayer Impact Measure (RIM) tests for the EE resource acquisition (RA), market support, equity, and C&S segments⁵⁹ of PG&E's portfolio, as well as for the overall EE portfolio, both with and without the C&S program benefits and costs. Per D.21-05-031,⁶⁰ only the RA segment is required to be cost-effective. PG&E is forecasting a cost-effective RA segment for the 2024–2027 portfolio with a TRC ratio of 1.64.

⁵⁷ D.23-08-005, Table 1.

⁵⁸ The Avoided Cost Calculator is updated biannually with the most recent update completed in 2022. The ACC vintage used for EE regulatory forecasts is based on the most current version adopted at the time of filing and as applied in the CPUC's California Energy Data and Reporting System (CEDARS). The Portfolio Plan was filed before the 2022 ACC was available.

⁵⁹ Cost-effectiveness is reported for the resource acquisition, market support, and equity segments as defined in D. 21-05-031, pp.14–15.

⁶⁰ D.21-05-031, OP 3.

Table 6: Portfolio Cost Effectiveness Ratios (PY 2024–2027)

		TRC ratio	PAC ratio	RIM ratio
Segment	Resource Acquisition	1.64	1.95	0.93
	Market Support	0.50	1.14	0.67
	Equity	0.00	0.00	0.00
	Codes and Standards (C&S)	2.23	33.79	26.43
Portfolio	<i>Including C&S</i>	1.84	6.31	3.51
	<i>Excluding C&S</i>	1.11	1.56	0.82

Portfolio-level TRC, PAC, and RIM calculations in Table 6 include costs for:

- EM&V;⁶¹
- All EE programs except those noted immediately below.

Portfolio-level TRC, PAC, and RIM calculations in Table 6 exclude costs for:

- Emerging Technologies (ET) programs;
- BayREN, 3C-REN, R-REN, MCE, San Jose Clean Energy (SJCE), CleanPowerSF (CPSF), Sonoma Clean Power (SCP), Peninsula Clean Energy (PCE), and East Bay Community Energy (EBCE), benefits and costs;
- Administrative costs associated with PG&E's performance of the fiscal agent role for BayREN, 3C-REN, and R-REN;^{62,63}
- Energy Savings Assistance (ESA) benefits and costs; and
- Market effects.

These calculations exclude any consideration of a shareholder incentive, per the moratorium on the Energy Savings Performance Incentive (ESPI) established in D. 20-11-013.⁶⁴

C. Statewide and Third-Party Compliance

PG&E's 2024–2027 portfolio is forecasted to achieve both statewide and third-party compliance targets. The cumulative total portfolio budget used in the denominator⁶⁵ for the statewide and third-party threshold requirements of \$900,007,518 includes EM&V but does not include the ED Portfolio Oversight budget or additions to the OBF loan pool.

⁶¹ EM&V costs total 4% of PG&E's EE portfolio budget. See Section III.I. for more details on EM&V.

⁶² D.19-12-021, OP 5.

⁶³ PG&E is not the sole fiscal agent for R-REN, but rather one of several. D.23-06-055, Table 6, outlines the fiscal responsibility for R-REN by IOU.

⁶⁴ D. 20-11-013, OP 1.

⁶⁵ Per D.18-05-041, OP 23, indicates that the denominator representing the total portfolio budget is calculated "including evaluation, measurement, and verification (EM&V) funding, but excluding funding allocated to other program administrators for other (non-statewide) programs."

Statewide Minimum Funding Contribution

Table 7 indicates PG&E's cumulative funding contribution toward statewide programs for 2024–2027 is 26%. Per D.23-06-055,⁶⁶ the required minimum statewide funding contribution for PG&E is reduced from 25 percent to 20 percent of its total portfolio funding for 2024–2027. The components in the calculation of statewide program budget totals for the numerator include budget forecasted for PG&E's share of statewide programs led by PG&E and other PAs, and PG&E's program support PA costs.

Third-Party Outsourcing Target

Table 7 indicates that 64.7% of PG&E's cumulative total portfolio budget for 2024–2027 is allocated to third-party qualified programs. As directed in D.16-08-019 and reaffirmed in D.18-01-004 and D.18-05-041,⁶⁷ PG&E forecasts that at least 60 percent of its total portfolio budget will be allocated to programs that meet the updated third-party definition⁶⁸ for 2024–2027.

Table 7: Portfolio Statewide and Third-party Contribution Percentage Requirements (IOU only)

Line	Budget Component	Qualifying Budget	Cumulative Total Budget w/o OBF Loan Pool or ED Portfolio Oversight	Contribution Percentage	Minimum Threshold
1	Statewide ^{(a)(c)}	\$233,634,554	\$900,007,518	26.0%	20%
2	Third-party ^(b)	\$581,908,149		64.7%	60%

(a) Statewide programs meet the definition adopted in D.16-08-019, OP 5, Statewide minimum thresholds by IOU were set in D.23-06-055, Table 3 and CoL 4.

(b) Third party programs are categorized based on the definition adopted in D.16-08-019, OP 10. The third-party minimum threshold was set in D.16-08-019, OP 12.

(c) BayREN's Home Energy Score (HES) program, as approved in D.23-06-055⁶⁹, is not included in this filing's Statewide qualifying budget. Since HES is part of BayREN's portfolio spending budget and not the IOUs' spending budgets, PG&E does not include it in the numerator or denominator of its statewide calculation. Budget for BayREN's HES program is included in collections for BayREN, per D.23-06-055.⁷⁰ BayREN will submit a Tier 2 Advice Letter no later than July 1, 2026, which will include a proposed statewide plan for the HES program.⁷¹

D. Market Support and Equity

Pursuant to D.21-05-031, PG&E's TUAL forecast for the market support and equity segments does not exceed thirty percent (30%) of its total portfolio budget. Table 8 shows PG&E's 2024–2027 cumulative forecast budget for the market support and equity

⁶⁶ D.23-06-055, Table 3 and CoL 4.

⁶⁷ D.16-08-019, OP 10; D.18-01-004, OP 1; and D.18-05-041, OP 4.

⁶⁸ D.16-08-019, OP 10. "To be designated as 'third party,' the program must be proposed, designed, implemented, and delivered by non-utility personnel under contract to a utility program administrator."

⁶⁹ D.23-06-055, OP 3.

⁷⁰ Ibid, Table 9.

⁷¹ Ibid, OP 3.

segments is 26.3% of its total portfolio budget. The cumulative total portfolio budget of \$900,007,518 used in the denominator for the market support and equity segment budget cap includes EM&V but does not include the ED Portfolio Oversight budget or additions to the OBF loan pool.

Table 8: Market Support Segment and Equity Segment Budget 2024–2027

Line	Segment	Qualifying Budget	Cumulative Total Budget w/o OBF Loan Pool or ED Portfolio Oversight	Percentage of Budget	Cumulative Cap
1	Market Support	\$191,787,317	\$900,007,518	21.3%	30.0%
2	Equity	\$45,355,489		5.0%	
3	Market Support + Equity	\$237,142,806		26.3%	

PG&E is not making any updates to its program segmentation designations set forth in its Portfolio Plan for 2024–2027. However, PG&E has added new program IDs with program segmentation designations as discussed in Section IV.G.

E. Non-Advocacy C&S Budget

Pursuant to D.23-04-035,⁷² PG&E's TUAL forecast for non-advocacy C&S program⁷³ budgets does not exceed seventy percent (70%) of the total C&S budget. Table 9 shows PG&E's 2024–2027 cumulative non-advocacy C&S budget is 61.4% of the total C&S budget including program support PA costs and excluding portfolio support PA costs.

Table 9: Non-Advocacy C&S Budget 2024–2027

Line	Cumulative Non-Advocacy C&S Program Budget	Cumulative Total C&S Budget	Percentage of Budget	Cumulative Cap
1	\$75,047,108	\$122,212,690	61.4%	70%

F. Segment Metrics

Pursuant to D.18-05-041, PG&E reported on sector-level metrics and their associated targets for each program year between 2017 through 2022 as part of each respective

⁷² D.23-04-035, OP 8.

⁷³ PG&E's non-advocacy C&S programs are: Compliance Improvement (PGE21053), Reach Codes (PGE21054), Planning and Coordination (PGE21055), and Code Readiness (PGE21056). PG&E's advocacy programs are: Statewide Appliance Standards Advocacy (SW_CSA_Appl), Statewide Building Codes Advocacy (SW_CSA_Bldg), Statewide National Codes & Standards Advocacy (SW_CSA_Natl), and C&S Decarbonization Support (PGE_CS_Decarb), per D.23-04-035 pp. 26–27.

year's EE Annual Report filings.⁷⁴ The latter can be found in spreadsheet form on the CPUC's CEDARS website.⁷⁵

Pursuant to D.23-06-055,⁷⁶ PG&E is engaged with other PAs to identify whether segment metrics and criteria for market support and equity programs should be modified and will be included in future filings, as needed.

G. Program Changes

This section identifies changes to PG&E's proposed programmatic activity relative to its Portfolio Plan for 2024–2027.

New Program IDs for 2024–2027

PG&E's TUAL forecast includes three program IDs for programs that were not included in its 2024–2027 Portfolio Plan,⁷⁷ and nine new program IDs for tracking purposes only (see Table 11).

Programs Not Included in 2024–2027 Portfolio Plan

PG&E's forecast includes budgets for three programs that were not included in the 2024–2027 Portfolio Plan. However, PG&E's forecast only includes a TSB and cost-effectiveness forecast, developed by PG&E staff, for the SRPA placeholder (PGE_Com_006). PG&E is not requesting to open any new programs through this TUAL filing and provides this for informative purposes. PG&E will submit advice letters as needed for new programs that trigger filing requirements per D.18-01-004.⁷⁸ Additional information for each new program ID is included in Table 10 and additional information on the programs is included below the table.

⁷⁴ 2017, 2018, and 2019 EE Annual Reports filed on May 1st of 2018, 2019, and 2020, respectively. 2020 EE Annual Report filed on May 3, 2021. 2021 and 2022 EE Annual Reports filed on June 1st of 2022 and 2023, respectively.

⁷⁵ [Documents - CEDARS \(sound-data.com\)](#)

⁷⁶ D.23-06-055, OP 11.

⁷⁷ PG&E does not include any programs in its TUAL forecast that meet the definition for “new” per D.21-05-031, OP 12: A program is considered new if it makes a change in the market sector, a change in implementation or delivery strategy, or meet already-existing triggers for third-party contract approvals given in Decision 18-01-004, Ordering Paragraph 2.

⁷⁸ D.18-01-004, OP 2 requires Tier 2 advice letters “for each third party contract, or a batch of third party contracts, that is valued at \$5 million or more and/or with a term of longer than three years, for Commission review.”

Table 10: New Program IDs for 2024–2027

Program ID	Program Name	Program Description	Segment	Program Type
PGE_Com_006	Summer Reliability Platform Administrator Placeholder ^(a)	PG&E is seeking a new EE and demand flexibility solution targeting the peak and net peak electric demand windows through an open market of qualified installers utilizing population NMEC method to measure savings.	Resource Acquisition	Proposed Local Third-Party
PGE_Com_007	Commercial Behavioral Program	PG&E to deliver energy usage information, energy savings tips, and energy efficiency programs information to non-residential customers to help them save energy.	Resource Acquisition	Proposed Local Third-Party
PGE_Com_008	Multi-DER Placeholder ^(a)	PG&E includes this placeholder for the EE portion of a potential pilot program(s) that could deliver ongoing load shifting that reduces peak consumption. PG&E envisions this can occur in coordination with non-EE funding sources.	Market Support	Proposed Local Third-Party

(a) Placeholders reflect programs that PG&E plans to solicit, contract, and/or implement in 2024–2027.

Summer Reliability Platform Administrator (SRPA) Placeholder

As described in Section III.A.iv.b, PG&E launched a solicitation for a SRPA in September 2023, with the intent to launch a program by the summer of 2024. PG&E has assigned this program to the resource acquisition segment because it intends to pursue a program with a primary purpose of delivering short-term, cost-effective avoided cost benefits to build a tighter connection between EE program investments and grid impacts, and support summer reliability.

Commercial Behavior Program

PG&E has created a new program ID for a Commercial Behavior Program (PGE_Com_007) to distinguish the work from its residential counterpart, the Residential Behavior Program (PGE_Res_002d), and to properly account for the benefits and costs at the sector level. PG&E has introduced Business Energy Reports (BER), leveraging the expertise from Home Energy Reports (HER), to drive engagement with small-to-medium business customers.⁷⁹ PG&E is still evaluating opportunities to claim TSB for BER. The Commercial Behavior Program is currently under contract to the same third-party

⁷⁹ Home Energy Reports and Business Energy Reports are the market names for Residential and Commercial Behavior Program products.

implementer as the Residential Behavior Program; therefore PG&E has also assigned this program to the resource acquisition segment.

Multi-DER Placeholder

PG&E has created a new placeholder program ID with budget for one or more pilot programs in recognition of the opportunity stemming from the guidance in D.23-06-055 allowing PAs to set aside budget to “fund innovative integrated demand-side management projects, including ongoing load-shifting that is not event-based.”⁸⁰ PG&E intends to solicit for a local program proposed, designed, implemented, and delivered by a third-party vendor. PG&E has assigned this program to the market support segment because it envisions that the primary purpose of a multi-DER pilot program will be to work toward building and enabling demand for IDSM projects.

Program IDs Created for Tracking

PG&E created the following program IDs to properly track the costs associated with portfolio support PA costs, ED Portfolio Oversight costs, and GRC overhead costs. Further information for the treatment of these costs can be found in Section III.A.ii of this TUAL.

Table 11: Program IDs Created for Tracking

Program ID	Program Name	Segment
PGE_CS_PortfolioSupport	Codes & Standards Portfolio Support PA Costs	C&S
PGE_Equity_PortfolioSupport	Equity Portfolio Support PA Costs	Equity
PGE_MS_PortfolioSupport	Market Support Portfolio Support PA Costs	Market Support
PGE_RA_PortfolioSupport	Resource Acquisition Portfolio Support PA Costs	Resource Acquisition
PGE_CS_GRC_Overheads	GRC Labor Loaders – Codes and Standards	C&S
PGE_Equity_GRC_Overheads	GRC Labor Loaders – Equity	Equity
PGE_MS_GRC_Overheads	GRC Labor Loaders – Market Support	Market Support
PGE_RA_GRC_Overheads	GRC Labor Loaders – Resource Acquisition	Resource Acquisition
PGE_Portfolio_Oversight	ED Portfolio Oversight	EM&V

H. Program Closures

This section documents program closures not previously included in PG&E’s 2022–2023 Biennial Budget Advice Letter (BBAL)⁸¹ or PG&E’s 2024–2027 Portfolio Plan.

⁸⁰ D.23-06-055, OP 29.

⁸¹ PG&E Advice 4521-G/6385-E, as filed on November 8, 2021, and supplemental Advice 4521-G-A/6385-E-A, as filed on January 7, 2022.

i. Programs closed between the Application filing and the True-Up Advice Letter

PG&E closed two programs in 2023 that were originally forecasted to be part of the 2024–2027 portfolio. These programs, listed in Table 12, were closed by early program termination, following the process outlined in Commission guidance regarding program closures from D.21-05-031,⁸² and received approval for these program closures.⁸³ PG&E is not seeking additional approval for the program closures listed in this section but is including them here to highlight portfolio changes between the Portfolio Plan and TUAL filings.

Table 12: Programs Closed by early contract termination prior to 2024–2027

Program ID	Program Name	Advice Letter
PGE_SW_NC_Res_mixed PGE_SW_NC_Res_mixed_PA	Statewide New Construction Residential Mixed Fuel Program	Advice 4680-G/6760-E
PGE_Res_003	Multifamily Energy Savings Program	Advice 4754-G/6943-E

Commission guidance states that in the occurrence where a third-party program is ending according to its original contract term length, PAs are not required to complete the program closure checklist.⁸⁴ For the purposes of stakeholder transparency, PG&E includes in Table 13 the following list of third-party programs, originally included in the 2024–2027 Portfolio Plan, that have not or will not be renewed at the end of their original contract terms in 2023.

Table 13: Programs Closed at contract term end date prior to 2024–2027

Program ID	Program Name	Contract Term End Date
PGE_Pub_006	San Francisco Local Government Partnership	6/30/2023
PGE210212	Compressed Air and Vacuum Optimization Program	12/31/2023

ii. Programs to be Closed in 2024–2027

PG&E's Portfolio Plan included details regarding expected program closures in 2024–2027.⁸⁵ Program closures already approved in D.23-06-055 are not included in this TUAL.

PG&E has legacy core programs with continuing pipelines that have been in the process of ramping down in anticipation of new statewide or local third-party programs. These

⁸² D.21-05-031, OP 12.

⁸³ PG&E Advice 4680-G/6760-E was effective December 14, 2022. PG&E Advice 4754-G/6943-E was effective June 14, 2023.

⁸⁴ Energy Division Process Checklist to Energy Efficiency Program Administrators for Program Closures and Launches (12/31/2021), in compliance with D.21-05-031, OP 12.

⁸⁵ PG&E Business Plan, Exhibit 3, Table 4.3 (2024 and Beyond Program Changes).

program ramp-downs were included in PG&E's 2022–2023 BBAL⁸⁶ and 2024–2027 Portfolio Plan and have remained active to complete committed projects. While these programs were expected to have completed commitments by the end of 2023, some projects may need to be extended into the 2024–2027 portfolio plan period to complete verification and final incentive payments on remaining projects. PG&E is providing updates on estimated commitment completion dates in Table 14, below.

Table 14: Programs to be Closed Upon Completion of Commitments

Program ID	Program Name	Reason for Closure	Estimated Completion of Commitments	Explanation for Change
PGE2110012	University of California/ California State University	Program was extended to gap-fill for incoming third-party programs and will ramp down as new third-party program ramps up	12/2024	Delay in customer completion timelines extending project deadlines until 2024. Program remaining open to meet customer commitments.
PGE2110013	State of California	Finishing existing pipeline and ramping down in anticipation of new third-party program overlap	12/2024	Delay in customer completion timelines extending project deadlines until 2024. Program remaining open to meet customer commitments.

I. EM&V

Tables 15–18 show the EM&V budgets for each year between 2024–2027 for PG&E, BayREN, MCE, and the portion of 3C-REN and R-REN that accounts for shared territory with PG&E.

Table 15: 2024 EM&V Budgets

PA	Total PA Budget without EM&V	EM&V Total ^(a)	EM&V CPUC Portion ^(b)	EM&V PA Portion	Total PA Budget with EM&V
PG&E, excluding ED Portfolio Oversight ^(c)	\$215,657,336	\$8,985,722	\$6,245,077	\$2,740,645	\$224,643,059
PG&E's share of ED Portfolio Oversight	\$314,800	\$0	\$0	\$0	\$314,800
BayREN ^(d)	\$36,713,058	\$1,529,711	\$1,109,041	\$420,670	\$38,242,769
BayREN Statewide Program ^(e)	\$0	\$0	\$0	\$0	\$0
MCE ^(f)	\$18,862,993	\$785,958	\$471,575	\$314,383	\$19,648,951

⁸⁶ PG&E BBAL, Table 9, pp. 29–30.

3C-REN ^(g)	\$7,256,074	\$302,336	\$219,194	\$83,142	\$7,558,410
R-REN ^(h)	\$9,198,213	\$383,259	\$277,863	\$105,396	\$9,581,472
Totals	\$288,002,474	\$11,986,986	\$8,322,750	\$3,664,237	\$299,989,461

(a) The EM&V total amount (including CPUC and PA portions) is assumed to be 4% of the PA's total budget with EM&V.

(b) For BayREN, MCE, 3C-REN, and Rural REN (R-REN), the EM&V CPUC portion was calculated by subtracting the PA's portion from the EM&V total.

(c) PG&E's EM&V split is 69.5% CPUC / 30.5% PA for 2024–2027. PG&E shifted 3% of EM&V budget from the CPUC share of the default 72.5% CPUC / 27.5% PG&E split of the total EM&V budget to the PG&E share to cover the CEDARS solicitation, in alignment with D.23-02-002 OP 15 and SCE's advice letter (AL) 5064-E.

(d) BayREN's budget numbers for Regional BayREN Programs taken from BayREN's draft TUAL forecast emailed on 9/1/2023.

(e) BayREN's Statewide budget numbers for the Home Energy Score Program taken from BayREN's draft TUAL forecast emailed 9/22/2023. PG&E's portion of BayREN's Statewide program budget is 31.313%.

(f) MCE's budget numbers taken from MCE's draft TUAL forecast emailed on 9/5/2023.

(g) 3C-REN's budget numbers taken from 3C-REN's draft TUAL forecast emailed on 10/3/2023. PG&E's portion of 3C-REN's budget is 45.6%.

(h) R-REN's budget numbers taken from R-REN's draft TUAL forecast emailed on 8/31/2023. PG&E's share is 48%.

Table 16: 2025 EM&V Budgets

PA	Total PA Budget without EM&V	EM&V Total ^(a)	EM&V CPUC Portion ^(b)	EM&V PA Portion	Total PA Budget with EM&V
PG&E, excluding ED Portfolio Oversight ^(c)	\$233,299,117	\$9,720,797	\$6,755,954	\$2,964,843	\$243,019,913
PG&E's share of ED Portfolio Oversight	\$314,800	\$0	\$0	\$0	\$314,800
BayREN ^(d)	\$38,657,099	\$1,610,712	\$1,167,766	\$442,946	\$40,267,811
BayREN Statewide Program ^(e)	\$0	\$0	\$0	\$0	\$0
MCE ^(f)	\$18,425,372	\$767,724	\$460,634	\$307,090	\$19,193,096
3C-REN ^(g)	\$7,597,540	\$316,564	\$229,509	\$87,055	\$7,914,104
R-REN ^(h)	\$9,678,174	\$403,257	\$292,362	\$110,896	\$10,081,432
Totals	\$307,972,102	\$12,819,054	\$8,906,225	\$3,912,829	\$320,791,156

(a) The EM&V total amount (including CPUC and PA portions) is assumed to be 4% of the PA's total budget with EM&V.

(b) For BayREN, MCE, 3C-REN, and Rural REN (R-REN), the EM&V CPUC portion was calculated by subtracting the PA's portion from the EM&V total.

(c) PG&E's EM&V split is 69.5% CPUC / 30.5% PA for 2024–2027. PG&E shifted 3% of EM&V budget from the CPUC share of the default 72.5% CPUC / 27.5% PG&E split of the total EM&V budget to the PG&E share to cover the CEDARS solicitation, in alignment with D.23-02-002 OP 15 and SCE's advice letter (AL) 5064-E.

(d) BayREN's budget numbers for Regional BayREN Programs taken from BayREN's draft TUAL forecast emailed on 9/1/2023.

(e) BayREN's Statewide budget numbers for the Home Energy Score Program taken from BayREN's draft TUAL forecast emailed 9/22/2023. PG&E's portion of BayREN's Statewide program budget is 31.313%.

(f) MCE's budget numbers taken from MCE's draft TUAL forecast emailed on 9/5/2023.

(g) 3C-REN's budget numbers taken from 3C-REN's draft TUAL forecast emailed on 10/3/2023. PG&E's portion of 3C-REN's budget is 45.6%.

(h) R-REN's budget numbers taken from R-REN's draft TUAL forecast emailed on 8/31/2023. PG&E's share is 48%.

Table 17: 2026 EM&V Budgets

PA	Total PA Budget without EM&V	EM&V Total ^(a)	EM&V CPUC Portion ^(b)	EM&V PA Portion	Total PA Budget with EM&V
PG&E, excluding ED Portfolio Oversight ^(c)	\$229,092,620	\$9,545,526	\$6,634,140	\$2,911,385	\$238,638,146
PG&E's share of ED Portfolio Oversight	\$314,800	\$0	\$0	\$0	\$314,800
BayREN ^(d)	\$39,626,801	\$1,651,117	\$1,197,060	\$454,057	\$41,277,918
BayREN Statewide Program ^(e)	\$1,317,105	\$54,879	\$39,788	\$15,092	\$1,371,985
MCE ^(f)	\$18,246,899	\$760,287	\$456,172	\$304,115	\$19,007,187
3C-REN ^(g)	\$7,959,060	\$331,628	\$240,430	\$91,198	\$8,290,688
R-REN ^(h)	\$9,958,169	\$414,924	\$300,820	\$114,104	\$10,373,093
Totals	\$306,515,455	\$12,758,361	\$8,868,409	\$3,889,951	\$319,273,816

(a) The EM&V total amount (including CPUC and PA portions) is assumed to be 4% of the PA's total budget with EM&V.

(b) For BayREN, MCE, 3C-REN, and Rural REN (R-REN), the EM&V CPUC portion was calculated by subtracting the PA's portion from the EM&V total.

(c) PG&E's EM&V split is 69.5% CPUC / 30.5% PA for 2024–2027. PG&E shifted 3% of EM&V budget from the CPUC share of the default 72.5% CPUC / 27.5% PG&E split of the total EM&V budget to the PG&E share to cover the CEDARS solicitation, in alignment with D.23-02-002 OP 15 and SCE's advice letter (AL) 5064-E.

(d) BayREN's budget numbers for Regional BayREN Programs taken from BayREN's draft TUAL forecast emailed on 9/1/2023.

(e) BayREN's Statewide budget numbers for the Home Energy Score Program taken from BayREN's draft TUAL forecast emailed 9/22/2023. PG&E's portion of BayREN's Statewide program budget is 31.313%.

(f) MCE's budget numbers taken from MCE's draft TUAL forecast emailed on 9/5/2023.

(g) 3C-REN's budget numbers taken from 3C-REN's draft TUAL forecast emailed on 10/3/2023. PG&E's portion of 3C-REN's budget is 45.6%.

(h) R-REN's budget numbers taken from R-REN's draft TUAL forecast emailed on 8/31/2023. PG&E's share is 48%.

Table 18: 2027 EM&V Budgets

PA	Total PA Budget without EM&V	EM&V Total ^(a)	EM&V CPUC Portion ^(b)	EM&V PA Portion	Total PA Budget with EM&V
PG&E, excluding ED Portfolio Oversight ^(c)	\$224,358,144	\$9,348,256	\$6,497,038	\$2,851,218	\$233,706,400
PG&E's share of ED Portfolio Oversight	\$314,800	\$0	\$0	\$0	\$314,800
BayREN ^(d)	\$40,308,613	\$1,679,526	\$1,217,656	\$461,870	\$41,988,139
BayREN Statewide Program ^(e)	\$1,658,895	\$69,121	\$50,112	\$19,008	\$1,728,015
MCE ^(f)	\$18,068,886	\$752,870	\$451,722	\$301,148	\$18,821,757
3C-REN ^(g)	\$8,429,158	\$351,215	\$254,631	\$96,584	\$8,780,373
R-REN ^(h)	\$9,969,171	\$415,382	\$301,152	\$114,230	\$10,384,553
Totals	\$303,107,667	\$12,616,369	\$8,772,311	\$3,844,058	\$315,724,036

(a) The EM&V total amount (including CPUC and PA portions) is assumed to be 4% of the PA's total budget with EM&V.

(b) For BayREN, MCE, 3C-REN, and Rural REN (R-REN), the EM&V CPUC portion was calculated by subtracting the PA's portion from the EM&V total.

(c) PG&E's EM&V split is 69.5% CPUC / 30.5% PA for 2024–2027. PG&E shifted 3% of EM&V budget from the CPUC share of the default 72.5% CPUC / 27.5% PG&E split of the total EM&V budget to the PG&E share to cover the CEDARS solicitation, in alignment with D.23-02-002 OP 15 and SCE's advice letter (AL) 5064-E.

(d) BayREN's budget numbers for Regional BayREN Programs taken from BayREN's draft TUAL forecast emailed on 9/1/2023.

(e) BayREN's Statewide budget numbers for the Home Energy Score Program taken from BayREN's draft TUAL forecast emailed 9/22/2023. PG&E's portion of BayREN's Statewide program budget is 31.313%.

(f) MCE's budget numbers taken from MCE's draft TUAL forecast emailed on 9/5/2023.

(g) 3C-REN's budget numbers taken from 3C-REN's draft TUAL forecast emailed on 10/3/2023. PG&E's portion of 3C-REN's budget is 45.6%.

(h) R-REN's budget numbers taken from R-REN's draft TUAL forecast emailed on 8/31/2023. PG&E's share is 48%.

J. Cost Recovery

To fund the 2024–2027 PG&E, BayREN, MCE, 3C-REN, R-REN, East Bay Community Energy (EBCE), and CleanPowerSF (CPSF) portfolios and EM&V budgets (as applicable) identified in this TUAL, PG&E requests total cost recovery in the amount of \$1,233,529,577. This cost recovery amount reflects the total PA budget requests, offset in some cases by pre-2024 unspent and uncommitted funds already collected by the PAs.

Table 19 summarizes the total cost recovery figures for PG&E, BayREN, MCE, EBCE, CPSF and PG&E's portion of 3C-REN and R-REN for 2024–2027, aligning with the final TUAL template provided by ED Staff, and does not include the applicable electric and gas portions for cost recovery. Table 20 presents the total cost recovery request for PG&E's portfolio and Table 21 presents the total cost recovery request for the RENs and CCAs in PG&E's territory for which PG&E requests cost recovery on their behalf, inclusive of the applicable electric and gas portions for cost recovery. As noted in Section IV.J.i and Table 22 below, PG&E is designating \$16M from its 2023 unspent and uncommitted funds for

offset for the program year 2024 cost recovery request. Pre-2024 unspent and uncommitted funds from the RENs and CCAs are included in Table 21 and are used to offset the cost recovery request for program year 2024.

Since the time PG&E filed its 2024–2027 Portfolio Plan on February 15, 2022, five new Elect-to-Administer (ETA) CCAs have been approved by the CPUC: San Jose Clean Energy (SJCE), CleanPowerSF (CPSF), Peninsula Clean Energy (PCE), Sonoma Clean Power (SCP), and East Bay Community Energy (EBCE). Tables 18 and 20 do not include a cost recovery request for three of the ETA CCAs active during the 2024–2027 period because PG&E has already transferred funds from prior years' unspent and uncommitted funds for the authorized budget amounts, as follows:

- SJCE's authorized three-year budget for 2022–2024 of \$5.067M⁸⁷
- PCE's authorized three-year budget for 2023–2025 of \$4.679M⁸⁸
- SCP's authorized three-year budget for 2023–2025 of \$3.075M⁸⁹

Tables 19 and 21 do include cost recovery requests for the third year of CPSF's three-year authorized budget of \$4.579M⁹⁰ and for the second and third years of the three-year authorized budget for East Bay Community Energy (EBCE) of \$13.463M.⁹¹

⁸⁷ Resolution E-5166: Certification of San Jose Clean Energy's Energy Efficiency Program Administration Plan. September 10, 2021. PG&E allocated \$5.067M to SJCE out of its 2021 unspent and uncommitted funds and transferred those funds to SJCE in October 2021.

⁸⁸ Resolution E-5197: Certification of Peninsula Clean Energy's EE Program Administration Plan, May 5, 2022. PG&E allocated \$4.679M out of its 2022 unspent and uncommitted funds and transferred those funds to PCE in September 2022.

⁸⁹ Resolution E-5198: Certification of Sonoma Clean Power's EE Program Administration Plan, June 2, 2022. PG&E allocated \$3.075M out of its 2022 unspent and uncommitted funds and transferred those funds to SCP in August 2022.

⁹⁰ Resolution E-5180: Certification of CleanPowerSF's EE Program Administration Plan, January 13, 2022. PG&E allocated \$1.526M for CPSF's first year budget out of its 2022 unspent and uncommitted funds and transferred those funds to CPSF in April 2022. PG&E allocated \$1.526M for CPSF's second year budget out of its 2023 unspent and uncommitted funds and transferred those funds to CPSF in April 2023.

⁹¹ Resolution E-5215: Certification of East Bay Community Energy's EE Program Administration Plan, September 15, 2022. PG&E allocated \$4.488M for the first year of EBCE's authorized three-year budget out of PG&E's 2023 unspent and uncommitted funds and transferred those to EBCE in January 2023.

Table 19: Total Cost Recovery Request, including REN/CCA and Other Costs⁹²

Line	Portfolio Administrator	(a) PA Programs	(b) ED Portfolio Oversight	(c) EM&V PA	(d) EM&V ED	(e) Unspent & Uncommitted Funds for 2024–2027 Offset	(f) Total
1	PG&E	\$902,407,217	\$1,259,200	\$11,468,092	\$26,132,209	(\$16,000,000)	\$925,266,718
2	BayREN	\$155,305,571	N/A	\$1,779,543	\$4,691,522	\$0	\$161,776,636
3	BayREN Statewide Program	\$2,976,000	N/A	\$34,100	\$89,900	\$0	\$3,100,000
4	MCE	\$73,604,151	N/A	\$1,226,736	\$1,840,104	(\$12,216,026)	\$64,454,964
5	3C-REN	\$31,241,832	N/A	\$357,979	\$943,764	(\$4,534,584)	\$28,008,991
6	R-REN	\$38,803,728	N/A	\$444,626	\$1,172,196	\$0	\$40,420,550
7	EBCE	\$8,975,366	N/A	N/A	N/A	\$0	\$8,975,366
8	CPSF	\$1,526,352	N/A	N/A	N/A	\$0	\$1,526,352
9	Total	\$1,214,840,217	\$1,259,200	\$15,311,076	\$34,869,695	(\$32,750,611)	\$1,233,529,577

Electric and Gas Split

As PG&E included in its Prepared Testimony,⁹³ the electric and gas split is based on the ratio of electric and gas avoided cost benefits. PG&E's electric and gas split has been updated accordingly for the TUAL given the changes in the avoided cost benefits forecasted for its portfolio, as well as the increases in gas avoided costs in the 2022 ACC relative to the 2021 ACC. Table 20 includes the applicable electric and gas splits for each year of the 2024–2027 period and includes a 100% electric split for budget forecasted for fuel substitution.⁹⁴

⁹² Revenue Fees and Uncollectible Account Expenses (RF&U) are not included in this cost recovery budget but will be added to electric funding to determine the revenue requirement when recovered in rates through the Annual Electric True-up (AET).

⁹³ PG&E Prepared Testimony Exhibit 2, Chapter 7, pp.7-4 and 7-5.

⁹⁴ While PG&E's Portfolio Plan did not include a breakout of fuel substitution as part of the electric and gas split, the breakout of fuel substitution is provided here for additional transparency into the calculation of the electric and gas revenue requirements and to demonstrate compliance with the requirement in D.19-08-009, OP 5 that directs fuel substitution measures and associated program costs to be funded by ratepayers of the new fuel.

Table 20: 2024–2027 PG&E Portfolio Cost Recovery Request

	Unspent & Uncommitted Funds for 2024 Offset	Spending Budget and Cost Recovery Request				
	2023	2024	2025	2026	2027	2024–2027
PG&E Portfolio						
PG&E (excluding fuel substitution budget)		\$211,495,472	\$230,541,420	\$230,115,746	\$225,636,238	\$897,788,877
PG&E Budget Forecasted to Support Fuel Substitution ^(a)		\$13,462,387	\$12,793,293	\$8,837,200	\$8,384,962	\$43,477,841
Total Cost Recovery Request for PG&E Portfolio (excluding offset)		\$224,957,859	\$243,334,713	\$238,952,946	\$234,021,200	\$941,266,718
PG&E 2023 Estimated Unspent & Uncommitted Funds to Offset 2024 Cost Recovery	(\$16,000,000)					(\$16,000,000)
Total Cost Recovery Request for PG&E Portfolio (including offset) ^(b)		\$208,957,859	\$243,334,713	\$238,952,946	\$234,021,200	\$925,266,718
Applicable Electric Split	80%	58%	59%	58%	57%	
Applicable Gas Split	20%	42%	41%	42%	43%	
Electric Portion for Cost Recovery (excluding fuel substitution budget)	(\$16,000,000)	\$122,604,122	\$136,070,183	\$134,594,230	\$129,536,981	\$522,805,517
Fuel Substitution Applicable Electric Split		100%	100%	100%	100%	

Electric Portion for Cost Recovery (fuel substitution budget)		\$13,462,387	\$12,793,293	\$8,837,200	\$8,384,962	\$43,477,841
Total Electric Portion for Cost Recovery for PG&E Portfolio (b)(c)	(\$12,800,000)	\$123,266,509	\$148,863,476	\$143,431,430	\$137,921,943	\$553,483,358
Gas Portion for Cost Recovery for PG&E Portfolio (b)	(\$3,200,000)	\$85,691,350	\$94,471,237	\$95,521,516	\$96,099,257	\$371,783,360
Electric Split (with fuel substitution) (d)		59%	61%	60%	59%	
Gas Split (with fuel substitution) (d)		41%	39%	40%	41%	

(a) For the purposes of cost recovery, all-electric new construction measures are included here with fuel substitution measures.

(b) 2023 unspent and uncommitted funds applied to offset 2024 cost recovery request.

(c) Revenue Fees and Uncollectible Account Expenses (RF&U) are not included in this cost recovery budget but will be added to electric funding to determine the revenue requirement when recovered in rates through the Annual Electric True-up (AET).

(d) The electric and gas splits with fuel substitution are based on the electric and gas portions of the cost recovery after accounting for fuel substitution

Table 21: 2024–2027 Cost Recovery for MCE, BayREN, 3C-REN, R-REN, EBCE, and CleanPowerSF

Non-IOU Portfolio Administrator	Unspent & Uncommitted Funds for 2024 Offset		Spending Budget and Cost Recovery Request				
	2021	2022	2024	2025	2026	2027	2024–2027
MCE							
MCE Spending Budget Request for 2024–2027 ^(a)			\$19,648,951	\$19,193,096	\$19,007,187	\$18,821,757	\$76,670,990
MCE Unspent and Uncommitted Funds for Offset	(\$8,216,227)	(\$3,999,800)					
MCE Total Cost Recovery Request (excluding offset)			\$19,648,951	\$19,193,096	\$19,007,187	\$18,821,757	\$76,670,990
MCE Total Cost Recovery Request (including offset to 2024 cost recovery)^(b)			\$7,432,925	\$19,193,096	\$19,007,187	\$18,821,757	\$64,454,964
BayREN							
BayREN Spending Budget Request for Regional Portfolio for 2024–2027 ^(a)			\$38,242,769	\$40,267,811	\$41,277,918	\$41,988,139	\$161,776,636
BayREN Spending Budget Request for Statewide Program for 2024–2027 ^(a)			\$0	\$0	\$1,371,985	\$1,728,015	\$3,100,000
BayREN Total Cost Recovery Request			\$38,242,769	\$40,267,811	\$42,649,903	\$43,716,154	\$164,876,636
3C-REN (PG&E portion)							
3C-REN Spending Budget Request for 2024–2027 ^(a)			\$7,558,410	\$7,914,104	\$8,290,688	\$8,780,373	\$32,543,575
3C-REN Unspent and Uncommitted Funds for Offset	(\$2,170,046)	(\$2,364,538)					
3C-REN Total Cost Recovery Request (excluding offset)			\$7,558,410	\$7,914,104	\$8,290,688	\$8,780,373	\$32,543,575
3C-REN Total Cost Recovery Request (including offset to 2024 cost recovery)^(b)			\$3,023,826	\$7,914,104	\$8,290,688	\$8,780,373	\$28,008,991
Rural REN (PG&E portion)							
Rural REN Spending Budget Request for 2024–2027 (PG&E electric portion) ^{(a)(c)}			\$7,984,560	\$8,401,193	\$8,644,244	\$8,653,794	\$33,683,791

Rural REN Spending Budget Request for 2024–2027 (PG&E gas portion) ^{(a)(c)}			\$1,596,912	\$1,680,239	\$1,728,849	\$1,730,759	\$6,736,759
R-REN Total Cost Recovery Request			\$9,581,472	\$10,081,432	\$10,373,093	\$10,384,553	\$40,420,550
East Bay Community Energy			\$4,487,683	\$4,487,683	\$0	\$0	\$8,975,366
CleanPower SF			\$1,526,352	\$0	\$0	\$0	\$1,526,352
Total Cost Recovery Request for RENS/CCAs (excluding offset)			\$81,045,637	\$81,944,126	\$80,320,870	\$81,702,836	\$325,013,470
Total REN and CCA Unspent and Uncommitted to Offset Cost Recovery	(\$10,386,273)	(\$6,364,338)					(\$16,750,611)
Total Cost Recovery Request for RENS/CCAs (including offsets) ^(b)			\$64,295,027	\$81,944,126	\$80,320,870	\$81,702,836	\$308,262,859
Applicable Electric Split ^(d)	83%	82%	59%	61%	60%	59%	
Applicable Gas Split ^(d)	17%	18%	41%	39%	40%	41%	
Total Electric Portion for Cost Recovery Request for RENS/CCAs (including offset) ^(b)	(\$8,620,607)	(\$5,218,757)	\$33,970,338	\$50,130,486	\$48,212,577	\$48,152,107	\$180,465,508
Total Gas Portion for Cost Recovery Request for RENS/CCAs (including offset) ^(b)	(\$1,765,666)	(\$1,145,581)	\$30,324,689	\$31,813,640	\$32,108,293	\$33,550,729	\$127,797,351

(a) includes 4% EM&V

(b) Unspent and uncommitted funds from RENS and CCAs from pre-2024 applied to offset 2024 cost recovery amount

(c) PG&E's electric and gas portions of the Rural REN budget is directed in Table 6 of D.23-06-055.

(d) PG&E's electric-gas split (with fuel substitution) is applied to all PAs included in PG&E's authorized budget cap except Rural REN (see table footnote c)

i. Unspent Funds

Table 22 presents unspent funds. It distinguishes between funds that are committed to be spent on a specific cost, and funds that are uncommitted and will be applied to offset cost recovery in 2024. While typically all unspent and uncommitted funds serve to offset the cost recovery amount for the next year's budget, per D. 21-01-004,⁹⁵ any PG&E 2020, 2021, and 2022 unspent and uncommitted funds were to be transferred to the California Energy Commission (CEC) to fund the Schools Stimulus Program created in California Assembly Bill 841. PG&E's 2021 unspent and uncommitted funds were documented in PG&E Advice 4599-G/6565-E, and 2022 unspent and uncommitted funds were documented in Advice 6918-E-A/4743-G-A. These amounts were already added to the CEC's payment schedule and are not specified below.

Table 22: Prior Years' Unspent Funds as of August 2023

	PY 2017	PY 2018	PY 2019	PY 2020	PY 2021	PY 2022	PY 2023 (estimated)	Totals
Unspent & Committed								
EM&V (a)(b)	\$2,784,816	\$5,942,350	\$357,665	\$4,714,949	\$2,710,658	\$9,979,173	\$11,672,506	\$38,162,119
Total	\$2,784,816	\$5,942,350	\$357,665	\$4,714,949	\$2,710,658	\$9,979,173	\$11,672,506	\$38,162,119
Unspent & Uncommitted Pre-2023 EM&V, and PG&E Program funds for 2024 Rate Offset								
EM&V - PG&E Funds ^(b)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
EM&V - CPUC Funds ^(b)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
PG&E Program Funds ^(c)	\$0	\$0	\$0	\$0	\$0	\$0	\$16,000,000	\$16,000,000
Total	\$0	\$0	\$0	\$0	\$0	\$0	\$16,000,000	\$16,000,000

(a) Includes unspent funds from the CPUC (\$30.4 million) and PG&E (\$7.8 million).

(b) D.23-06-055 conclusion of law 23 clarified that unspent EM&V funds may be carried forward to pay for any authorized evaluation activity, regardless of year or program cycle.

(c) PG&E provided all 2020, 2021, and 2022 unspent & uncommitted funds to the CEC for the School Stimulus Program created in California Assembly Bill 841, per D.21-01-004. PG&E's 2021 unspent & uncommitted funds were documented in Advice 4599-G/6565-E, and 2022 unspent & uncommitted funds were documented in Advice 6918-E-A/4743-G-A. PG&E provides \$16M of 2023 unspent & uncommitted funds for 2024 rate offset, and will provide a further accounting of additional 2023 unspent funds in a future advice letter.

ii. Integrated Demand-Side Management (IDSM) Budget

D.23-06-055 allows for up to \$15M to be spent during 2024–2027 to “fund innovative integrated demand-side management projects.”⁹⁶ As explained in Section III.A.iv.d, PG&E forecasts budget from four programs as a part of its cost recovery request that may be considered toward the “EE-IDSM” funding cap.

⁹⁵ Decision 21-01-004, OP 1 and 2.

⁹⁶ D.23-06-055, OP 29, p. 128.

K. CEDARS Discrepancies

The total PG&E portfolio budget, TRC, and PAC values presented in this TUAL contain a discrepancy with the values shown in the CEDARS dashboard for this 2024–2027 filing.⁹⁷ This discrepancy occurs because PG&E's OBF loan pool contribution budget of \$40M for 2024–2027 is included in PG&E's advice letter total portfolio budget but excluded from the total portfolio budgets shown in the CEDARS dashboard for the 2024–2027 filing. This is because the OBF loan pool Program ID is flagged in CEDARS for exclusion from the portfolio budget as these funds are not forecasted expenditures. Rather, these funds contribute to PG&E's revolving loan pool that is not captured in the portfolio budget through CEDARS expenditures reporting.

An additional discrepancy occurs because the funds allocated to the Energy Division to support Portfolio Oversight are also excluded from the total portfolio budget shown in the CEDARS dashboard as directed by Energy Division Staff because they are funds Energy Division requires to enhance the Energy Division's oversight of the state's energy efficiency portfolio and not funds required for any individual PA to deliver or evaluate their portfolio.

L. Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than November 6, 2023, which is 21 days⁹⁸ 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

⁹⁷ The PG&E 2022–2023 Energy Efficiency Biennial Budget Advice Letter, Advice 4521-G-A/6385-E-A, also identified this discrepancy.

⁹⁸ The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

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

Pursuant to General Order (GO) 96-B, Rule 5.2, this advice letter is submitted with a Tier 2 designation. PG&E requests that the Commission approve its 2024–2027 TUAL spending budget of \$941,266,718 and cost recovery budget of \$1,233,529,577 effective January 1, 2024.⁹⁹

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 lists for R.13-11-005, A.17-01-013 et al. 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.Officer@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/

Sidney Bob Dietz II
Director, Regulatory Relations
CPUC Communications

Attachments:

Attachment A – Appendices
Attachment B – CEDARS Filing Confirmation

cc: Ely Jacobsohn, Energy Division
Amy Reardon, Energy Division
Jacob Rudolph, Energy Division
Service List R.13-11-005
Service List A.22-02-005

⁹⁹ Section III.I. of this advice letter provides more detail on PG&E's cost recovery request.



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 M)

Utility type:

☒ ELC ☒ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Kimberly Loo

Phone #: (279)789-6209

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) #: 4814-G/7047-E

Tier Designation: 2

Subject of AL: PG&E's 2024-2027 True-Up Advice Letter in Compliance with Decision 21-05-031, Decision 23-06-055, and Decision 23-08-005

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.21-05-031, D.23-06-055, and D.23-08-005

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: 1/1/24

No. of tariff sheets:

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:

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:
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 A

Appendices

Appendix 1 - 2024 - 2027 Program Portfolio Budget and Targets

(a) Program ID	(b) Program Name	(c) Target Exempt	(d) Program Type	(e) Business Sector	(f) Portfolio Segment	(g) Budget	(h) TSB	(i) kWh	(j) kW	(k) Thm	(l) Change Notes
PGE_Ag_001	Agricultural Efficiency Program	No	Local Third Party	Agricultural	Resource Acquisition	\$ 37,706,599	\$ 52,766,464	24,743,398	3,806	4,095,505	50% increase in TSB primarily due to ACC update (see narrative section IV.A) and increased budget and expected them savings
PGE_Com_001	Grocery Efficiency Program	No	Local Third Party	Commercial	Resource Acquisition	\$ 4,861,694	\$ 12,844,191	8,837,493	1,030	-	67% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i) and performance management (see narrative section III.A.iv)
PGE_Com_002	Laboratory Performance Efficiency Program	No	Local Third Party	Commercial	Resource Acquisition	\$ 3,570,255	\$ 4,187,181	5,814,000	684	273,600	54% reduction in TSB primarily due to reduced budget and expected savings
PGE_Com_003	Commercial Efficiency Program	No	Local Third Party	Commercial	Resource Acquisition	\$ 19,929,559	\$ 42,698,887	13,405,823	5,418	2,896,542	43% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i) and performance management (see narrative section III.A.iv)
PGE_Com_004	High Tech and Bio Tech Efficiency Program	No	Local Third Party	Commercial	Resource Acquisition	\$ 6,363,213	\$ 7,320,240	16,580,370	1,070	179,084	43% reduction in TSB primarily due to reduced budget and expected savings
PGE_Com_005	Healthcare Efficiency Program	No	Local Third Party	Commercial	Resource Acquisition	\$ 6,042,737	\$ 8,215,406	7,341,396	1,222	178,932	56% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i) and performance management (see narrative section III.A.iv)
PGE_Com_006	Summer Reliability Platform Administrator Placeholder	No	Local Third Party	Commercial	Resource Acquisition	\$ 37,844,891	\$ 29,523,693	50,163,686	6,906	-	46% reduction in TSB primarily due to reduced budget and expected savings
PGE_Com_007	Commercial Behavioral Program	No	Local Third Party	Commercial	Resource Acquisition	\$ 2,495,806	\$ -	-	-	-	54% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i) and performance management (see narrative section III.A.iv)
PGE_Com_008	Multi-DER Placeholder	No	Local Third Party	Commercial	Market Support	\$ 1,925,000	\$ -	-	-	-	55% reduction in TSB primarily due to reduced budget and expected savings
PGE_Com_EM	Commercial Energy Management Placeholder	No	Local Third Party	Commercial	Resource Acquisition	\$ 9,463,872	\$ 9,876,584	23,085,000	2,906	897,750	- New program ID not in Portfolio Plan
PGE_Com_SmallBiz	Micro and Small Business Program	Yes	Local Third Party	Commercial	Equity	\$ 14,557,236	\$ -	-	-	-	30% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i) and updated information (delayed program launch)
PGE_Com_2E	Zonal Electrification Placeholder (Commercial)	No	Local Third Party	Commercial	Equity	\$ 6,527,055	\$ -	-	-	-	34% reduction in budget primarily due to updated information (awarded contract)
PGE_CS_Desarb	C&S Decarbonization Support Placeholder	Yes	Core PA	Codes and Standards	C&S	\$ 3,726,550	\$ -	-	-	-	31% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i) and updated information (sector and program optimization)
PGE_CS_GRC_Overheads	GRC Labor Loaders - Codes and Standards	Yes	PA Costs	Portfolio Support	C&S	\$ -	\$ -	-	-	-	31% reduction in TSB primarily due to reduced budget and expected savings
PGE_CS_PortfolioSupport	Codes & Standards Portfolio Support PA Costs	Yes	PA Costs	Portfolio Support	C&S	\$ 10,070,147	\$ -	-	-	-	47% reduction in TSB primarily due to reduced budget and expected savings
PGE_EMV_001	PGE EM&V	Yes	Core PA	EM&V	EM&V	\$ 11,488,092	\$ -	-	-	-	No change
PGE_EMV_002	CPUC EM&V	Yes	Core PA	EM&V	EM&V	\$ 26,132,209	\$ -	-	-	-	- New program ID not in Portfolio Plan
PGE_Equity_GRC_Overheads	GRC Labor Loaders - Equity	Yes	PA Costs	Portfolio Support	Equity	\$ -	\$ -	-	-	-	34% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i) and updated information (lower implementer demand)
PGE_Equity_PortfolioSupport	Equity Portfolio Support PA Costs	Yes	PA Costs	Portfolio Support	Equity	\$ 2,512,525	\$ -	-	-	-	47% reduction in TSB primarily due to reduced budget and expected savings
PGE_Ind_001a	Industrial Strategic Energy Management - Food Processing	No	Local Third Party	Industrial	Resource Acquisition	\$ 26,291,379	\$ 98,381,334	10,890,672	5,263	8,257,644	30% increase in TSB primarily due to ACC update (see narrative section IV.A) and expected savings
PGE_Ind_001b	Industrial Strategic Energy Management - Manufacturing	No	Local Third Party	Industrial	Resource Acquisition	\$ 31,473,586	\$ 105,672,780	97,290,000	13,816	9,000,000	266% increase in TSB primarily due to ACC update (see narrative section IV.A) and increased budget and expected savings
PGE_Ind_002	Petroleum and Chemical Efficiency Program	No	Local Third Party	Industrial	Resource Acquisition	\$ 10,095,290	\$ 37,468,204	14,680,400	1,767	2,014,508	79% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i) and performance management (see narrative section III.A.iv)
PGE_Ind_003	Manufacturing and Food Processing Efficiency Program	No	Local Third Party	Industrial	Resource Acquisition	\$ 14,095,916	\$ 18,821,699	17,599,017	2,533	884,291	54% reduction in TSB primarily due to reduced budget and expected savings
PGE_LoanPool	Financing Loan Pool Addition	Yes	Core PA	DBF Loan Pool	Loan Pool	\$ 40,000,000	\$ -	-	-	-	31% reduction in TSB primarily due to reduced budget and expected savings
PGE_MS_GRC_Overheads	GRC Labor Loaders - Market Support	Yes	PA Costs	Portfolio Support	Market Support	\$ -	\$ -	-	-	-	47% reduction in TSB primarily due to reduced budget and expected savings
PGE_MS_PortfolioSupport	Market Support Portfolio Support PA Costs	Yes	PA Costs	Portfolio Support	Market Support	\$ 13,133,860	\$ -	-	-	-	No change
PGE_OBFP	On-Bill Financing Alternative Pathway	No	Core PA	On Billing Finance	Market Support	\$ 13,460,671	\$ 44,825,483	55,876,402	12,746	341,249	- New program ID not in Portfolio Plan
PGE_OtherPA_Admin	IOU REN/CCA Admin Costs	Yes	Core PA	Commercial	Resource Acquisition	\$ 930,568	\$ -	-	-	-	34% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i) and updated information (lower implementer demand)
PGE_Portfolio_Oversight	CPUC Portfolio Oversight	Yes	Portfolio Oversight	EM&V	EM&V	\$ 1,259,200	\$ -	-	-	-	47% reduction in TSB primarily due to reduced budget and expected savings
PGE_Pub_001	Central Coast Local Government Partnership	Yes	Local Third Party	Public - LGP	Market Support	\$ 2,285,196	\$ -	-	-	-	25% increase in budget primarily due to updated information (more RENs and CCAs approved since Portfolio Plan filing)
PGE_Pub_002	Marin Local Government Partnership	Yes	Local Third Party	Public - LGP	Market Support	\$ 787,596	\$ -	-	-	-	- New program ID not in Portfolio Plan
PGE_Pub_003	Redwood Local Government Partnership	Yes	Local Third Party	Public - LGP	Market Support	\$ 1,747,596	\$ -	-	-	-	40% increase in budget primarily due to increased scope
PGE_Pub_004	Central California Local Government Partnership	Yes	Local Third Party	Public - LGP	Market Support	\$ 3,625,596	\$ -	-	-	-	<25% change in budget or TSB
PGE_Pub_005	San Mateo Local Government Partnership	Yes	Local Third Party	Public - LGP	Market Support	\$ 3,073,459	\$ -	-	-	-	<25% change in budget or TSB
PGE_Pub_007	Sierra Local Government Partnership	Yes	Local Third Party	Public - LGP	Market Support	\$ 2,572,599	\$ -	-	-	-	34% increase in budget primarily due to increased scope
PGE_Pub_008	Sonoma Local Government Partnership	Yes	Local Third Party	Public - LGP	Market Support	\$ 2,156,559	\$ -	-	-	-	<25% change in budget or TSB
PGE_Pub_009	Government and K-12 Comprehensive Program	No	Local Third Party	Public	Resource Acquisition	\$ 17,791,536	\$ 16,411,142	(6,522,147)	719	1,482,829	30% increase in budget primarily due to increased scope
PGE_Pub_010	Wastewater Process Efficiency Program	No	Local Third Party	Public	Resource Acquisition	\$ 3,408,647	\$ 2,889,635	6,406,762	682	-	47% increase in TSB primarily due to ACC update (see narrative section IV.A) and increased budget and expected them savings
PGE_Pub_011	California Analysis Tool for Local Energy Assessment (CATALENA)	Yes	Core PA	Public	Market Support	\$ 357,915	\$ -	-	-	-	36% increase in TSB primarily due to ACC update (see narrative section IV.A) and updated information (timing delays shift benefits into 2024-2027 period)
PGE_Pub_Resiliency	Resiliency Support Placeholder (Public)	No	Local Third Party	Public	Market Support	\$ 2,855,946	\$ -	-	-	-	50% decrease in budget primarily due to updated information (early payment)
PGE_RA_GRC_Overheads	GRC Labor Loaders - Resource Acquisition	Yes	PA Costs	Portfolio Support	Resource Acquisition	\$ -	\$ -	-	-	-	52% decrease in budget primarily due to PA cost methodology changes (see narrative section III.A.i) and delayed program launch
PGE_RA_PortfolioSupport	Resource Acquisition Portfolio Support PA Costs	Yes	PA Costs	Portfolio Support	Resource Acquisition	\$ 37,918,351	\$ -	-	-	-	- New program ID not in Portfolio Plan
PGE_Res_001b	Virtual Energy Audit Program	No	Local Third Party	Residential	Resource Acquisition	\$ 7,141,775	\$ 5,256,119	19,318,457	1,135	705,135	79% increase in TSB primarily due to ACC update (see narrative section IV.A)
PGE_Res_002a	Universal Audit Tool Program	No	Local Third Party	Residential	Resource Acquisition	\$ 11,356,333	\$ 12,063,063	81,158,425	-	2,120,400	131% increase in TSB primarily due to ACC update (see narrative section IV.A) and expected savings
PGE_Res_002d	Residential Behavioral Program	No	Local Third Party	Residential	Resource Acquisition	\$ 86,397,142	\$ 154,321,797	835,600,000	209,522	29,003,000	61% increase in TSB primarily due to ACC update (see narrative section IV.A) and increased budget and expected savings
PGE_Res_002e	Online Marketplace Program	Yes	Core PA	Residential	Market Support	\$ 3,363,566	\$ -	-	-	-	<25% change in budget or TSB
PGE_Res_Equity	Residential Equity Placeholder	No	Local Third Party	Residential	Equity	\$ 11,997,938	\$ -	-	-	-	<25% change in budget or TSB
PGE_Res_LoadMgt	Residential Load Management Placeholder	No	Local Third Party	Residential	Market Support	\$ 9,821,227	\$ -	-	-	-	39% increase in budget primarily due to updated information (shift from Residential Market Support Placeholder and D-23-05-055 OP 29)
PGE_Res_Mkt_Spt	Residential Market Support Placeholder	No	Local Third Party	Residential	Market Support	\$ 8,170,620	\$ -	-	-	-	51% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i) and shift to Residential Load Management Placeholder
PGE_Res_Resiliency	Resiliency Support Placeholder (Residential)	No	Local Third Party	Residential	Market Support	\$ 4,235,851	\$ -	-	-	-	42% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i) and delayed program launch
PGE_Res_2E	Zonal Electrification Placeholder (Residential)	No	Local Third Party	Residential	Equity	\$ 6,686,227	\$ -	-	-	-	<25% change in budget or TSB
PGE_SW_CSA_Appl	State Appliance Standards Advocacy	No	SW 3rd Party	Codes and Standards	C&S	\$ 6,070,065	\$ 931,693,812	1,027,297,108	142,332	20,077,643	27% increase in TSB primarily due to ACC update (see narrative section IV.A)
PGE_SW_CSA_Appl_PA	State Appliance Standards Advocacy PA Costs	No	SW 3rd Party	Codes and Standards	C&S	\$ 5,204,126	\$ -	-	-	-	77% increase in budget primarily due to increases in appliance testing for state standards
PGE_SW_CSA_Bldg	State Building Codes Advocacy	No	SW 3rd Party	Codes and Standards	C&S	\$ 16,405,086	\$ 2,828,588,286	2,069,605,027	428,207	51,007,150	43% increase in TSB primarily due to ACC update (see narrative section IV.A)
PGE_SW_CSA_Bldg_PA	State Building Codes Advocacy PA Costs	No	SW 3rd Party	Codes and Standards	C&S	\$ 5,792,696	\$ -	-	-	-	28% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i)
PGE_SW_CSA_Natl	National Codes & Standards Advocacy	No	SW 3rd Party	Codes and Standards	C&S	\$ 9,225,026	\$ 709,356,474	929,580,079	240,557	5,258,482	46% increase in TSB primarily due to ACC update (see narrative section IV.A)
PGE_SW_CSA_Natl_PA	National Codes & Standards Advocacy PA Costs	No	SW 3rd Party	Codes and Standards	C&S	\$ 742,034	\$ -	-	-	-	80% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i) and shift in appliance testing to state standards
PGE_SW_ETP_Elec	Emerging Technologies Program, Electric	Yes	SW 3rd Party	Emerging Technologies	Market Support	\$ 20,530,792	\$ -	-	-	-	35% reduction in budget; PG&E provides funding to the Lead PA, Southern California Edison (SCE), for this statewide program. Please refer to SCE's True-Up Advice Letter for change notes
PGE_SW_ETP_Elec_PA	Emerging Technologies Program, Electric - PGE Costs	Yes	SW 3rd Party	Emerging Technologies	Market Support	\$ 162,579	\$ -	-	-	-	89% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i)
PGE_SW_ETP_Gas	Emerging Technologies Program, Gas	Yes	SW 3rd Party	Emerging Technologies	Market Support	\$ 5,110,800	\$ -	-	-	-	<25% change in budget or TSB
PGE_SW_ETP_Gas_PA	Emerging Technologies Program, Gas - PGE Costs	Yes	SW 3rd Party	Emerging Technologies	Market Support	\$ 84,384	\$ -	-	-	-	94% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i)
PGE_SW_FS	Food Service POS	No	SW 3rd Party	Commercial	Resource Acquisition	\$ 26,688,800	\$ 44,492,018	10,862,534	2,167	2,477,298	<25% change in budget or TSB
PGE_SW_FS_PA	Food Service POS - PGE Costs	No	SW 3rd Party	Commercial	Resource Acquisition	\$ 922,932	\$ -	-	-	-	62% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i)
PGE_SW_HVAC_QIOM	Statewide Residential QIOM	No	SW 3rd Party	Residential	Market Support	\$ 9,530,819	\$ -	-	-	-	100% reduction in TSB; PG&E provides funding to the Lead PA, San Diego Gas & Electric Company (SDG&E), for this statewide program. Please refer to SDG&E's True-Up Advice Letter for change notes
PGE_SW_HVAC_QIOM_PA	Statewide Residential QIOM - PGE Costs	No	SW 3rd Party	Residential	Market Support	\$ 74,365	\$ -	-	-	-	95% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i)
PGE_SW_HVAC_Up_Com	SW HVAC Upstream Commercial	No	SW 3rd Party	Commercial	Resource Acquisition	\$ 14,823,920	\$ 22,317,734	15,527,054	7,681	221,071	31% reduction in budget and 43% reduction in TSB; PG&E provides funding to the Lead PA, SDG&E, for this statewide program. Please refer to SDG&E's True-Up Advice Letter for change notes
PGE_SW_HVAC_Up_Com_PA	SW HVAC Upstream Commercial - PGE Costs	No	SW 3rd Party	Commercial	Resource Acquisition	\$ 282,128	\$ -	-	-	-	83% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i)
PGE_SW_HVAC_Up_Res	SW HVAC Upstream Residential	No	SW 3rd Party	Residential	Resource Acquisition	\$ 3,555,748	\$ 4,772,749	(657,628)	4	321,037	31% reduction in budget and 27% reduction in TSB; PG&E provides funding to the Lead PA, SDG&E, for this statewide program. Please refer to SDG&E's True-Up Advice Letter for change notes
PGE_SW_HVAC_Up_Res_PA	SW HVAC Upstream Residential - PGE Costs	No	SW 3rd Party	Residential	Resource Acquisition	\$ 173,097	\$ -	-	-	-	86% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.i)
PGE_SW_IP_Colleges	Institutional Partnerships, UC/CSU/OCCC	No	SW 3rd Party	Public	Resource Acquisition	\$ 4,750,092	\$ 7,032,729	9,364,359	277	164,186	35% reduction in budget; PG&E provides funding to the Lead PA, SCE, for this statewide program. Please refer to SCE's True-Up Advice Letter for change notes

PGE_SW_IP_Colleges_PA	Institutional Partnerships, UC/CSU/CCC - PGE Costs	No	SW 3rd Party	Public	Resource Acquisition	\$	560,301	\$	-	-	-	-	70% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3)
PGE_SW_IP_Gov	Institutional Partnerships: DGS and DoC	No	SW 3rd Party	Public	Resource Acquisition	\$	4,741,863	\$	9,743,761	7,221,137	2,199	387,875	62% reduction in budget and 48% reduction in TSB primarily due to statewide program budget contribution change per D.23-06-055 OP1.
PGE_SW_IP_Gov_PA	Institutional Partnerships: DGS and DoC - PGE Costs	No	SW 3rd Party	Public	Resource Acquisition	\$	1,175,253	\$	-	-	-	-	69% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3)
PGE_SW_MCWH	Midstream Comm Water Heating	No	SW 3rd Party	Commercial	Resource Acquisition	\$	22,224,000	\$	153,159,804	(952,309)	(19)	7,036,314	236% increase in TSB; PG&E provides funding to the Lead PA, Southern California Gas Company (SoCalGas), for this statewide program. Please refer to SoCalGas' True-Up Advice Letter for change notes
PGE_SW_MCWH_PA	Midstream Comm Water Heating - PGE Costs	No	SW 3rd Party	Commercial	Resource Acquisition	\$	1,607,581	\$	-	-	-	-	36% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3)
PGE_SW_NC_NonRes_Ag	SW New Construction NonRes Ag - All Electric	No	SW 3rd Party	Agricultural	Market Support	\$	529,363	\$	830,241	212,696	23	29,468	84% reduction in budget primarily due to statewide program budget contribution change per D.23-06-055 OP1 and expected reduced all-electric potential in sector
PGE_SW_NC_NonRes_Ag	SW New Construction NonRes Ag - All Electric - PGE Costs	No	SW 3rd Party	Agricultural	Market Support	\$	130,953	\$	-	-	-	-	89% reduction in TSB primarily due to reductions in budget and expected savings
PGE_SW_NC_NonRes_Ag	SW New Construction NonRes Ag - Mixed Fuel	No	SW 3rd Party	Agricultural	Market Support	\$	1,737,314	\$	2,947,295	1,847,136	588	47,323	87% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3)
PGE_SW_NC_NonRes_Ag	SW New Construction NonRes Ag - Mixed Fuel - PGE Costs	No	SW 3rd Party	Agricultural	Market Support	\$	173,918	\$	-	-	-	-	<25% change in budget or TSB
PGE_SW_NC_NonRes_Com	SW New Construction NonRes Com - All Electric	No	SW 3rd Party	Commercial	Market Support	\$	3,410,343	\$	8,982,229	216,089	41	422,871	44% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3)
PGE_SW_NC_NonRes_Com	SW New Construction NonRes Com - All Electric - PGE Costs	No	SW 3rd Party	Commercial	Market Support	\$	534,831	\$	-	-	-	-	41% increase in TSB primarily due to ACC update (see narrative section IV.A) and increased budget due to expected increased all-electric potential in sector
PGE_SW_NC_NonRes_Com	SW New Construction NonRes Com - Mixed Fuel	No	SW 3rd Party	Commercial	Market Support	\$	2,263,520	\$	5,362,824	1,690,300	658	261,659	41% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3)
PGE_SW_NC_NonRes_Com	SW New Construction NonRes Com - Mixed Fuel - PGE Costs	No	SW 3rd Party	Commercial	Market Support	\$	506,520	\$	-	-	-	-	38% reduction in budget primarily due to statewide program budget contribution change per D.23-06-055 OP1 and expected reduced all-electric potential in sector
PGE_SW_NC_NonRes_Ind	SW New Construction NonRes Ind - All Electric	No	SW 3rd Party	Industrial	Market Support	\$	895,337	\$	3,423,598	345	1	164,041	86% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3)
PGE_SW_NC_NonRes_Ind	SW New Construction NonRes Ind - All Electric - PGE Costs	No	SW 3rd Party	Industrial	Market Support	\$	183,566	\$	-	-	-	-	88% reduction in budget and 78% reduction in TSB primarily due to statewide program budget contribution change per D.23-06-055 OP1 and expected reduced all-electric potential in sector
PGE_SW_NC_NonRes_Ind	SW New Construction NonRes Ind - Mixed Fuel	No	SW 3rd Party	Industrial	Market Support	\$	3,862,739	\$	29,696,909	6,134,027	954	1,454,547	87% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3)
PGE_SW_NC_NonRes_Ind	SW New Construction NonRes Ind - Mixed Fuel - PGE Costs	No	SW 3rd Party	Industrial	Market Support	\$	716,542	\$	-	-	-	-	84% reduction in budget primarily due to statewide program budget contribution change per D.23-06-055 OP1 and expected reduced all-electric potential in sector
PGE_SW_NC_NonRes_Pub	SW New Construction NonRes Public - All Electric	No	SW 3rd Party	Public	Market Support	\$	7,561,620	\$	28,312,858	123,315	(88)	1,348,123	73% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3)
PGE_SW_NC_NonRes_Pub	SW New Construction NonRes Public - All Electric - PGE Costs	No	SW 3rd Party	Public	Market Support	\$	688,454	\$	-	-	-	-	61% increase in budget primarily due to expected increased all-electric potential
PGE_SW_NC_NonRes_Pub	SW New Construction NonRes Public - Mixed Fuel	No	SW 3rd Party	Public	Market Support	\$	904,509	\$	2,786,206	1,256,195	645	81,711	200% increase in TSB primarily due to ACC update (see narrative section IV.A) and increased budget and expected savings
PGE_SW_NC_NonRes_Pub	SW New Construction NonRes Public - Mixed Fuel - PGE Costs	No	SW 3rd Party	Public	Market Support	\$	170,256	\$	-	-	-	-	37% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3)
PGE_SW_NC_NonRes_Res	SW New Construction NonRes Res - All Electric	No	SW 3rd Party	Residential	Market Support	\$	5,406,075	\$	14,875,986	987	5	712,348	62% reduction in budget and 51% reduction in TSB primarily due to statewide program budget contribution change per D.23-06-055 OP1 and shift to all-electric potential in sector
PGE_SW_NC_NonRes_Res	SW New Construction NonRes Res - All Electric - PGE Costs	No	SW 3rd Party	Residential	Market Support	\$	504,061	\$	-	-	-	-	69% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3)
PGE_SW_NC_NonRes_Res	SW New Construction NonRes Res - Mixed Fuel	No	SW 3rd Party	Residential	Market Support	\$	3,952,178	\$	14,484,584	4,196,292	1,079	613,839	25% increase in TSB primarily due to ACC update (see narrative section IV.A) and shift to all-electric potential in sector
PGE_SW_NC_NonRes_Res	SW New Construction NonRes Res - Mixed Fuel - PGE Costs	No	SW 3rd Party	Residential	Market Support	\$	408,034	\$	-	-	-	-	56% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3)
PGE_SW_NC_Res_electric	SW New Construction Res - All Electric	No	SW 3rd Party	Residential	Market Support	\$	15,240,834	\$	32,047,135	(1,216,177)	-	528,002	44% reduction in budget and 25% reduction in TSB primarily due to statewide program budget contribution change per D.23-06-055 OP1 shift to all-electric potential in sector
PGE_SW_NC_Res_electric	SW New Construction Res - All Electric - PGE Costs	No	SW 3rd Party	Residential	Market Support	\$	1,805,692	\$	-	-	-	-	76% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3)
PGE_SW_PLA	Plug Load and Appliance	No	SW 3rd Party	Residential	Resource Acquisition	\$	12,209,565	\$	9,225,798	839,517	356	776,690	While the total SW budget for this program ID increases by 55% due to budget shift from closure of SW New Construction Res - Mixed Fuel (see narrative section G.I), PG&E's share of program budget changes <25% due to statewide program budget contribution change per D.23-06-055 OP1
PGE_SW_PLA_PA	Plug Load and Appliance - PGE Costs	No	SW 3rd Party	Residential	Resource Acquisition	\$	302,287	\$	-	-	-	-	36% increase in TSB primarily due to ACC update (see narrative section IV.A)
PGE_SW_WET_CC	WET Career Connections	Yes	SW 3rd Party	Workforce Education and Training	Market Support	\$	1,385,560	\$	-	-	-	-	48% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3)
PGE_SW_WET_CC_PA	WET Career Connections - PGE Costs	Yes	SW 3rd Party	Workforce Education and Training	Market Support	\$	315,802	\$	-	-	-	-	69% reduction in budget and 73% reduction in TSB; PG&E provides funding to the Lead PA, SDG&E, for this statewide program. Please refer to SDG&E's True-Up Advice Letter for change notes
PGE_SW_WET_Work	WET Career and Workforce Readiness	Yes	SW 3rd Party	Workforce Education and Training	Equity	\$	2,771,120	\$	-	-	-	-	90% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3)
PGE_SW_WET_Work_PA	WET Career and Workforce Readiness - PGE Costs	Yes	SW 3rd Party	Workforce Education and Training	Equity	\$	293,388	\$	-	-	-	-	<25% change in budget or TSB
PGE_SW_WP	Water/wastewater pumping	No	SW 3rd Party	Public	Resource Acquisition	\$	3,967,350	\$	5,645,178	5,740,940	569	147,195	63% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3)
PGE_SW_WP_PA	Water/wastewater Pumping - PGE Costs	No	SW 3rd Party	Public	Resource Acquisition	\$	384,316	\$	-	-	-	-	59% reduction in budget and 48% reduction in TSB; PG&E provides funding to the Lead PA, SCE, for this statewide program. Please refer to SCE's True-Up Advice Letter for change notes
PGE_SWMEO	Statewide Marketing Education and Outreach	Yes	SWMEO	SWMEO	Market Support	\$	-	\$	-	-	-	-	80% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3)
PGE21011	Commercial Calculated Incentives	No	Core PA	Commercial	Resource Acquisition	\$	2,175,772	\$	59,713	246,959	139	-	No change
PGE21012	Commercial Deemed Incentives	No	Core PA	Commercial	Resource Acquisition	\$	4,229,122	\$	3,303,061	3,086,213	394	169,994	47% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3) and ramping down of core programs (see narrative section III.A.iv)
PGE21014	Commercial Energy Advisor	No	Core PA	Commercial	Resource Acquisition	\$	4,162,745	\$	-	-	-	-	94% reduction in TSB primarily due to reduced budget and expected savings
PGE21021	Industrial Calculated Incentives	No	Core PA	Industrial	Resource Acquisition	\$	4,289,002	\$	85,923,822	246,132	28	4,461,658	42% increase in budget primarily due to updated information (increased trend of deemed incentive applications)
PGE21022	Industrial Deemed Incentives	No	Core PA	Industrial	Resource Acquisition	\$	523,839	\$	2,656,794	-	-	166,403	128% increase in budget primarily due to updated information (large project)
PGE21024	Industrial Energy Advisor	No	Core PA	Industrial	Resource Acquisition	\$	504,471	\$	-	-	-	-	43073% increase in TSB primarily due to increased budget and expected savings (large project)
PGE21031	Agricultural Calculated Incentives	No	Core PA	Agricultural	Resource Acquisition	\$	472,686	\$	241,032	334,485	32	-	63% reduction in budget primarily due to PA cost methodology changes (see narrative section III.A.3) and ramping down of core programs (see narrative section III.A.iv)
PGE21032	Agricultural Deemed Incentives	No	Core PA	Agricultural	Resource Acquisition	\$	837,552	\$	294,357	648,480	119	-	49% reduction in budget and 75% reduction in TSB primarily due to PA cost methodology changes (see narrative section III.A.3) and ramping down of core programs (see narrative section III.A.iv)
PGE21034	Agricultural Energy Advisor	No	Core PA	Agricultural	Resource Acquisition	\$	703,629	\$	-	-	-	-	62% reduction in budget and 43% reduction in TSB primarily due to PA cost methodology changes (see narrative section III.A.3) and ramping down of core programs (see narrative section III.A.iv)
PGE21053	Compliance Improvement	Yes	Core PA	Codes and Standards	C&S	\$	23,880,645	\$	-	-	-	-	<25% change in budget or TSB
PGE21054	Reach Codes	Yes	Core PA	Codes and Standards	C&S	\$	8,790,016	\$	-	-	-	-	<25% change in budget or TSB
PGE21055	Planning and Coordination	Yes	Core PA	Codes and Standards	C&S	\$	4,068,920	\$	-	-	-	-	<25% change in budget or TSB
PGE21056	Code Readiness	Yes	Core PA	Codes and Standards	C&S	\$	38,307,627	\$	-	-	-	-	<25% change in budget or TSB
PGE21071	WE&T Integrated Energy Education and Training	Yes	Core PA	Workforce Education and Training	Market Support	\$	29,431,718	\$	-	-	-	-	<25% change in budget or TSB
PGE2110012	University of California/California State University	No	Core PA	Public	Resource Acquisition	\$	1,033,146	\$	3,553,350	3,326,632	438	226,794	No budget included in portfolio plan since program was previously expected to be closed before 2024
PGE2110013	State of California	No	Core PA	Public	Resource Acquisition	\$	521,206	\$	1,259,870	2,671,615	111	81,049	No budget included in portfolio plan since program was previously expected to be closed before 2024
Total						\$	941,266,718	\$	5,630,594,109	5,473,717,691	1,100,521	160,975,302	

Appendix 2 - Energy Efficiency Cap And Target Expenditure Projections (Cumulative for PY 2024-2027)

Line	Budget Category	Expenditures			Cap & Target Performance		
		(a) Non-Third Party Qualifying Costs	(b) Third Party Qualifying Costs	(c) Total Portfolio	(d) Percent of Budget ^[6]	(e) Cap Percentage	(f) Target %
1	Administrative Costs						
2	PA ^[1]	\$ 49,657,262		\$ 49,657,262	5.3%	10.0%	
3	Non-PA Third Party & Partnership ^[2]	\$ -	\$ 37,684,530	\$ 37,684,530	4.0%		10.0%
4	PA & Non-PA Target Exempt Programs ^[3]	\$ 16,401,703	\$ 5,469,295	\$ 21,870,998			
5	Marketing and Outreach Costs						
6	Marketing & Outreach	\$ 22,571,892	\$ 24,695,443	\$ 47,267,335	5.0%		6.0%
7	Direct Implementation Costs						
8	Incentives and Rebates	\$ 7,152,139	\$ 171,036,264	\$ 178,188,403			
9	Non Incentives and Non Rebates	\$ 71,155,438	\$ 279,250,049	\$ 350,405,487	37.3%		20.0%
10	Target Exempt (Non Incentives and Non Rebates)	\$ 113,560,635	\$ 63,772,567	\$ 177,333,202			
11	EM&V Costs (PA and ED) ^[4]	\$ 37,600,301	\$ -	\$ 37,600,301	4.0%	4.0%	
11a	EM&V - PA	\$ 11,468,092		\$ 11,468,092			
11b	EM&V - ED	\$ 26,132,209		\$ 26,132,209			
12	PA Spending Budget Request (excluding OBF Loan Pool Additions and excluding ED Portfolio Oversight)	\$ 318,099,369	\$ 581,908,149	\$ 900,007,518			
13	Total Third-Party Qualifying Costs ^[5]		\$ 581,908,149		64.7%		60.0%
14	OBF Loan Pool Addition	\$ 40,000,000		\$ 40,000,000			
15	PA Spending Budget Request (excluding ED Portfolio Oversight)			\$ 940,007,518			
16	ED Portfolio Oversight	\$ 1,259,200		\$ 1,259,200			
17	EE-Funded IDSM ^[7]	\$ 2,728,518	\$ 11,400,000		1.5%	2.5%	
18	PA Spending Budget Request			\$ 941,266,718			

[1] 10% cap requirement based on D.09-09-047 for IOU only

[2] New Third party program definition per D.16-08-019, OP 10. For Row 3 of this table, the "Third Party & Partnership" administrative costs under the "Non-Third Party Qualifying Costs" column are costs for programs that met the old Third Party definition prior to the transition to the new third party definition.

[3] Target Exempt Programs include: Emerging Technologies, Workforce Education & Training, Public Local Government Partnerships, and Codes & Standards programs (excluding Building Codes Advocacy, Appliance Standards Advocacy and National Standards Advocacy), Micro and Small Business Program, Online Marketplace Program, California Analysis Tool for Locational Energy Assessment (CATALENA), Residential Equity Placeholder Program, Zonal Electrification Placeholder Programs, and IOU REN/CCA Admin Costs.

[4] EM&V costs only include PG&E's Total EM&V budget (PA + ED) and does not include REN or CCAs EM&V budgets. The EM&V percentage uses \$940,007,518 as the denominator, equal to line 15 PA Spending Budget Request, excluding ED Portfolio Oversight.

[5] IOU's Third-Party Implementer Contracts (as defined per D.16-08-019, OP 10) includes third-party contract and incentive budgets and statewide qualifying contract and incentive budgets. Calculation of (d) Percent of Budget for Third-Party Implementer Contracts uses \$900,007,518 as its denominator, equal to line 12 PA Spending Budget Request, excluding OBF Loan Pool Additions and excluding ED Portfolio

[6] With the exception of Third Party Implementer Contracts as noted in footnote [5], calculation of (d) Percent of Budget uses \$940,007,518 as the denominator; equal to line 15 PA Budget Spending Request, excluding ED Portfolio Oversight.

[7] D.23-06-055 OP 29: Portfolio administrators (PAs) may set aside up to 2.5 percent, or \$4 million, whichever is greater, up to a maximum of \$15 million, from within their total budgets during 2024-2027 approved in this decision to fund innovative integrated demand-side management projects, including ongoing load-shifting that is not event-based. Energy efficiency funding shall not be used for rebating capital costs of non-efficiency technologies, except as already provided for electric panel upgrades in Decisions 19 -08-009 and 23-04-035. This amount is already included in Lines 2, 3, 6, and 9 above.

Attachment B

CEDARS Filing Confirmation

CEDARS FILING SUBMISSION RECEIPT

The PGE portfolio budget filing has been submitted and is now under review. A summary of the budget filing is provided below.

PA: Pacific Gas & Electric (PGE)

Budget Filing Year: 2024

Submitted: 18:49:37 on 10 Oct 2023

By: Jake Richardson

Advice Letter Number: A.22-02-005

* Portfolio Budget Filing Summary *

- TRC: 1.93
- PAC: 6.86
- TRC (no admin): 2.47
- PAC (no admin): 30.49
- RIM: 3.62
- Budget: \$214,643,058.81
- TotalSystemBenefit: \$1,535,798,213.64
- ElecBen: \$877,677,950.87
- GasBen: \$658,007,504.30
- OtherBen: \$4,550,947.24
- TRCCost: \$798,186,224.14
- PACCost: \$224,625,383.25

* Programs Included in the Budget Filing *

- PGE21011: Commercial Calculated Incentives
- PGE21012: Commercial Deemed Incentives
- PGE21014: Commercial Energy Advisor
- PGE21021: Industrial Calculated Incentives
- PGE21022: Industrial Deemed Incentives
- PGE21024: Industrial Energy Advisor
- PGE21031: Agricultural Calculated Incentives
- PGE21032: Agricultural Deemed Incentives
- PGE21034: Agricultural Energy Advisor
- PGE21053: Compliance Improvement

- PGE21054: Reach Codes
- PGE21055: Planning and Coordination
- PGE21056: Code Readiness
- PGE21071: WE&T; Integrated Energy Education and Training
- PGE2110012: University of California/California State University
- PGE2110013: State of California
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- PGE_Com_001: Grocery Efficiency Program
- PGE_Com_002: Laboratory Performance Efficiency Program
- PGE_Com_003: Commercial Efficiency Program
- PGE_Com_004: High Tech and Bio Tech Efficiency Program
- PGE_Com_005: Healthcare Efficiency Program
- PGE_Com_006: Summer Reliability Platform Administrator Placeholder
- PGE_Com_007: Commercial Behavioral Program
- PGE_Com_008: Multi-DER Placeholder
- PGE_Com_EM: Commercial Energy Management Placeholder
- PGE_Com_SmallBiz: Micro and Small Business Program
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- PGE_CS_GRC_Overheads: GRC Labor Loaders - Codes and Standards
- PGE_CS_PortfolioSupport: Codes & Standards Portfolio Support PA Costs
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- PGE_Equity_PortfolioSupport: Equity Portfolio Support PA Costs
- PGE_ESA: Energy Savings Assistance
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- PGE_Ind_001b: Industrial Strategic Energy Management - Manufacturing
- PGE_Ind_002: Petroleum and Chemical Efficiency Program
- PGE_Ind_003: Manufacturing and Food Processing Efficiency Program
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- PGE_Portfolio_Oversight: ED Portfolio Oversight
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- PGE_Pub_003: Redwood Local Government Partnership
- PGE_Pub_004: Central California Local Government Partnership
- PGE_Pub_005: San Mateo Local Government Partnership
- PGE_Pub_007: Sierra Local Government Partnership

- PGE_Pub_008: Sonoma Local Government Partnership
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- PGE_RA_GRC_Overheads: GRC Labor Loaders - Resource Acquisition
- PGE_RA_PortfolioSupport: Resource Acquisition Portfolio Support PA Costs
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- PGE_Res_002a: Universal Audit Tool Program
- PGE_Res_002d: Residential Behavioral Program
- PGE_Res_002e: Online Marketplace Program
- PGE_Res_Equity: Residential Equity Placeholder
- PGE_Res_LoadMgt: Residential Load Management Placeholder
- PGE_Res_Mkt_Spt: Residential Market Support Placeholder
- PGE_Res_ZE: Zonal Electrification Placeholder (Residential)
- PGE_SW_CSA_Appl: State Appliance Standards Advocacy
- PGE_SW_CSA_Appl_PA: State Appliance Standards Advocacy - PGE Costs
- PGE_SW_CSA_Bldg: State Building Codes Advocacy
- PGE_SW_CSA_Bldg_PA: State Building Codes Advocacy - PGE Costs
- PGE_SW_CSA_Natl: National Codes & Standards Advocacy
- PGE_SW_CSA_Natl_PA: National Codes & Standards Advocacy - PGE Costs
- PGE_SW_ETP_Elec: Emerging Technologies Program, Electric
- PGE_SW_ETP_Elec_PA: Emerging Technologies Program, Electric - PGE Costs
- PGE_SW_ETP_Gas: Emerging Technologies Program, Gas
- PGE_SW_ETP_Gas_PA: Emerging Technologies Program, Gas - PGE Costs
- PGE_SW_FS: Food Service POS
- PGE_SW_FS_PA: Food Service POS - PGE Costs
- PGE_SW_HVAC_QIQM: Statewide Residential QI/QM
- PGE_SW_HVAC_QIQM_PA: Statewide Residential QI/QM - PGE Costs
- PGE_SW_HVAC_Up_Com: SW HVAC Upstream Commercial
- PGE_SW_HVAC_Up_Com_PA: SW HVAC Upstream Commercial - PGE Costs
- PGE_SW_HVAC_Up_Res: SW HVAC Upstream Residential
- PGE_SW_HVAC_Up_Res_PA: SW HVAC Upstream Residential - PGE Costs
- PGE_SW_IP_Colleges: Institutional Partnerships, UC/CSU/CCC
- PGE_SW_IP_Colleges_PA: Institutional Partnerships, UC/CSU/CCC - PGE Costs
- PGE_SW_IP_Gov: Institutional Partnerships: DGS and DoC
- PGE_SW_IP_Gov_PA: Institutional Partnerships: DGS and DoC - PGE Costs
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- PGE_SW_MCWH_PA: Midstream Comm Water Heating - PGE Costs
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- PGE_SW_NC_NonRes_Ag_electric_PA: SW New Construction NonRes Ag - All Electric - PGE Costs
- PGE_SW_NC_NonRes_Ag_mixed: SW New Construction NonRes Ag - Mixed Fuel

- PGE_SW_NC_NonRes_Ag_mixed_PA: SW New Construction NonRes Ag - Mixed Fuel - PGE Costs
- PGE_SW_NC_NonRes_Com_electric: SW New Construction NonRes Com - All Electric
- PGE_SW_NC_NonRes_Com_electric_PA: SW New Construction NonRes Com - All Electric - PGE Costs
- PGE_SW_NC_NonRes_Com_mixed: SW New Construction NonRes Com - Mixed Fuel
- PGE_SW_NC_NonRes_Com_mixed_PA: SW New Construction NonRes Com - Mixed Fuel - PGE Costs
- PGE_SW_NC_NonRes_Ind_electric: SW New Construction NonRes Ind - All Electric
- PGE_SW_NC_NonRes_Ind_electric_PA: SW New Construction NonRes Ind - All Electric - PGE Costs
- PGE_SW_NC_NonRes_Ind_mixed: SW New Construction NonRes Ind - Mixed Fuel
- PGE_SW_NC_NonRes_Ind_mixed_PA: SW New Construction NonRes Ind - Mixed Fuel - PGE Costs
- PGE_SW_NC_NonRes_Pub_electric: SW New Construction NonRes Public - All Electric
- PGE_SW_NC_NonRes_Pub_electric_PA: SW New Construction NonRes Public - All Electric - PGE Costs
- PGE_SW_NC_NonRes_Pub_mixed: SW New Construction NonRes Public - Mixed Fuel
- PGE_SW_NC_NonRes_Pub_mixed_PA: SW New Construction NonRes Public - Mixed Fuel - PGE Costs
- PGE_SW_NC_NonRes_Res_electric: SW New Construction NonRes Res - All Electric
- PGE_SW_NC_NonRes_Res_electric_PA: SW New Construction NonRes Res - All Electric - PGE Costs
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CEDARS FILING SUBMISSION RECEIPT

The PGE portfolio budget filing has been submitted and is now under review. A summary of the budget filing is provided below.

PA: Pacific Gas & Electric (PGE)

Budget Filing Year: 2025

Submitted: 18:51:22 on 10 Oct 2023

By: Jake Richardson

Advice Letter Number: A.22-02-005

* Portfolio Budget Filing Summary *

- TRC: 1.83
- PAC: 5.97
- TRC (no admin): 2.4
- PAC (no admin): 27.15
- RIM: 3.45
- Budget: \$233,019,913.28
- TotalSystemBenefit: \$1,445,562,936.63
- ElecBen: \$838,396,978.78
- GasBen: \$602,878,043.38
- OtherBen: \$8,194,301.12
- TRCCost: \$793,921,763.54
- PACCost: \$242,687,340.71

* Programs Included in the Budget Filing *

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- PGE_SW_CSA_Bldg_PA: State Building Codes Advocacy - PGE Costs
- PGE_SW_CSA_Natl: National Codes & Standards Advocacy
- PGE_SW_CSA_Natl_PA: National Codes & Standards Advocacy - PGE Costs
- PGE_SW_ETP_Elec: Emerging Technologies Program, Electric
- PGE_SW_ETP_Elec_PA: Emerging Technologies Program, Electric - PGE Costs
- PGE_SW_ETP_Gas: Emerging Technologies Program, Gas
- PGE_SW_ETP_Gas_PA: Emerging Technologies Program, Gas - PGE Costs
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- PGE_SW_HVAC_Up_Com: SW HVAC Upstream Commercial
- PGE_SW_HVAC_Up_Com_PA: SW HVAC Upstream Commercial - PGE Costs
- PGE_SW_HVAC_Up_Res: SW HVAC Upstream Residential
- PGE_SW_HVAC_Up_Res_PA: SW HVAC Upstream Residential - PGE Costs
- PGE_SW_IP_Colleges: Institutional Partnerships, UC/CSU/CCC
- PGE_SW_IP_Colleges_PA: Institutional Partnerships, UC/CSU/CCC - PGE Costs
- PGE_SW_IP_Gov: Institutional Partnerships: DGS and DoC
- PGE_SW_IP_Gov_PA: Institutional Partnerships: DGS and DoC - PGE Costs
- PGE_SW_MCWH: Midstream Comm Water Heating
- PGE_SW_MCWH_PA: Midstream Comm Water Heating - PGE Costs
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- PGE_SW_NC_NonRes_Ag_electric_PA: SW New Construction NonRes Ag - All Electric - PGE Costs
- PGE_SW_NC_NonRes_Ag_mixed: SW New Construction NonRes Ag - Mixed Fuel

- PGE_SW_NC_NonRes_Ag_mixed_PA: SW New Construction NonRes Ag - Mixed Fuel - PGE Costs
- PGE_SW_NC_NonRes_Com_electric: SW New Construction NonRes Com - All Electric
- PGE_SW_NC_NonRes_Com_electric_PA: SW New Construction NonRes Com - All Electric - PGE Costs
- PGE_SW_NC_NonRes_Com_mixed: SW New Construction NonRes Com - Mixed Fuel
- PGE_SW_NC_NonRes_Com_mixed_PA: SW New Construction NonRes Com - Mixed Fuel - PGE Costs
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- PGE_SW_NC_NonRes_Ind_electric_PA: SW New Construction NonRes Ind - All Electric - PGE Costs
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- PGE_SW_NC_NonRes_Ind_mixed_PA: SW New Construction NonRes Ind - Mixed Fuel - PGE Costs
- PGE_SW_NC_NonRes_Pub_electric: SW New Construction NonRes Public - All Electric
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- PGE_SW_NC_NonRes_Pub_mixed: SW New Construction NonRes Public - Mixed Fuel
- PGE_SW_NC_NonRes_Pub_mixed_PA: SW New Construction NonRes Public - Mixed Fuel - PGE Costs
- PGE_SW_NC_NonRes_Res_electric: SW New Construction NonRes Res - All Electric
- PGE_SW_NC_NonRes_Res_electric_PA: SW New Construction NonRes Res - All Electric - PGE Costs
- PGE_SW_NC_NonRes_Res_mixed: SW New Construction NonRes Res - Mixed Fuel
- PGE_SW_NC_NonRes_Res_mixed_PA: SW New Construction NonRes Res - Mixed Fuel - PGE Costs
- PGE_SW_NC_Res_electric: SW New Construction Res - All Electric
- PGE_SW_NC_Res_electric_PA: SW New Construction Res - All Electric - PGE Costs
- PGE_SW_PLA: Plug Load and Appliance
- PGE_SW_PLA_PA: Plug Load and Appliance - PGE Costs
- PGE_SW_WET_CC: WET Career Connections
- PGE_SW_WET_CC_PA: WET Career Connections - PGE Costs
- PGE_SW_WET_Work: WET Career and Workforce Readiness
- PGE_SW_WET_Work_PA: WET Career and Workforce Readiness - PGE Costs
- PGE_SW_WP: Water/wastewater Pumping
- PGE_SW_WP_PA: Water/wastewater Pumping - PGE Costs

CEDARS FILING SUBMISSION RECEIPT

The PGE portfolio budget filing has been submitted and is now under review. A summary of the budget filing is provided below.

PA: Pacific Gas & Electric (PGE)

Budget Filing Year: 2026

Submitted: 18:52:55 on 10 Oct 2023

By: Jake Richardson

Advice Letter Number: A.22-02-005

* Portfolio Budget Filing Summary *

- TRC: 1.8
- PAC: 5.87
- TRC (no admin): 2.37
- PAC (no admin): 28.29
- RIM: 3.3
- Budget: \$228,638,146.15
- TotalSystemBenefit: \$1,383,753,388.23
- ElecBen: \$795,744,711.08
- GasBen: \$580,414,623.82
- OtherBen: \$8,899,411.40
- TRCCost: \$771,482,307.97
- PACCost: \$236,022,585.02

* Programs Included in the Budget Filing *

- PGE21011: Commercial Calculated Incentives
- PGE21012: Commercial Deemed Incentives
- PGE21014: Commercial Energy Advisor
- PGE21021: Industrial Calculated Incentives
- PGE21022: Industrial Deemed Incentives
- PGE21024: Industrial Energy Advisor
- PGE21031: Agricultural Calculated Incentives
- PGE21032: Agricultural Deemed Incentives
- PGE21034: Agricultural Energy Advisor
- PGE21053: Compliance Improvement

- PGE21054: Reach Codes
- PGE21055: Planning and Coordination
- PGE21056: Code Readiness
- PGE21071: WE&T; Integrated Energy Education and Training
- PGE_Ag_001: Agricultural Efficiency Program
- PGE_Com_001: Grocery Efficiency Program
- PGE_Com_002: Laboratory Performance Efficiency Program
- PGE_Com_003: Commercial Efficiency Program
- PGE_Com_004: High Tech and Bio Tech Efficiency Program
- PGE_Com_005: Healthcare Efficiency Program
- PGE_Com_006: Summer Reliability Platform Administrator Placeholder
- PGE_Com_007: Commercial Behavioral Program
- PGE_Com_008: Multi-DER Placeholder
- PGE_Com_EM: Commercial Energy Management Placeholder
- PGE_Com_SmallBiz: Micro and Small Business Program
- PGE_Com_ZE: Zonal Electrification Placeholder (Commercial)
- PGE_CS_Decarb: C&S; Decarbonization Support Placeholder
- PGE_CS_GRC_Overheads: GRC Labor Loaders - Codes and Standards
- PGE_CS_PortfolioSupport: Codes & Standards Portfolio Support PA Costs
- PGE_EMV_001: PGE EM&V;
- PGE_EMV_002: CPUC EM&V;
- PGE_Equity_GRC_Overheads: GRC Labor Loaders - Equity
- PGE_Equity_PortfolioSupport: Equity Portfolio Support PA Costs
- PGE_ESA: Energy Savings Assistance
- PGE_Ind_001a: Industrial Strategic Energy Management - Food Processing
- PGE_Ind_001b: Industrial Strategic Energy Management - Manufacturing
- PGE_Ind_002: Petroleum and Chemical Efficiency Program
- PGE_Ind_003: Manufacturing and Food Processing Efficiency Program
- PGE_LoanPool: Financing Loan Pool Addition
- PGE_MS_GRC_Overheads: GRC Labor Loaders - Market Support
- PGE_MS_PortfolioSupport: Market Support Portfolio Support PA Costs
- PGE_OBFAP: On-Bill Financing Alternative Pathway
- PGE_OtherPA_Admin: IOU REN/CCA Admin Costs
- PGE_Portfolio_Oversight: ED Portfolio Oversight
- PGE_Pub_001: Central Coast Local Government Partnership
- PGE_Pub_002: Marin Local Government Partnership
- PGE_Pub_003: Redwood Local Government Partnership
- PGE_Pub_004: Central California Local Government Partnership
- PGE_Pub_005: San Mateo Local Government Partnership
- PGE_Pub_007: Sierra Local Government Partnership
- PGE_Pub_008: Sonoma Local Government Partnership
- PGE_Pub_009: Government and K-12 Comprehensive Program

- PGE_Pub_010: Wastewater Process Efficiency Program
- PGE_Pub_011: California Analysis Tool for Locational Energy Assessment (CATALENA)
- PGE_Pub_Resiliency: Resiliency Support Placeholder (Public)
- PGE_RA_GRC_Overheads: GRC Labor Loaders - Resource Acquisition
- PGE_RA_PortfolioSupport: Resource Acquisition Portfolio Support PA Costs
- PGE_Res_001b: Virtual Energy Audit Program
- PGE_Res_002a: Universal Audit Tool Program
- PGE_Res_002d: Residential Behavioral Program
- PGE_Res_002e: Online Marketplace Program
- PGE_Res_Equity: Residential Equity Placeholder
- PGE_Res_LoadMgt: Residential Load Management Placeholder
- PGE_Res_Mkt_Spt: Residential Market Support Placeholder
- PGE_Res_Resiliency: Resiliency Support Placeholder (Residential)
- PGE_Res_ZE: Zonal Electrification Placeholder (Residential)
- PGE_SW_CSA_Appl: State Appliance Standards Advocacy
- PGE_SW_CSA_Appl_PA: State Appliance Standards Advocacy - PGE Costs
- PGE_SW_CSA_Bldg: State Building Codes Advocacy
- PGE_SW_CSA_Bldg_PA: State Building Codes Advocacy - PGE Costs
- PGE_SW_CSA_Natl: National Codes & Standards Advocacy
- PGE_SW_CSA_Natl_PA: National Codes & Standards Advocacy - PGE Costs
- PGE_SW_ETP_Elec: Emerging Technologies Program, Electric
- PGE_SW_ETP_Elec_PA: Emerging Technologies Program, Electric - PGE Costs
- PGE_SW_ETP_Gas: Emerging Technologies Program, Gas
- PGE_SW_ETP_Gas_PA: Emerging Technologies Program, Gas - PGE Costs
- PGE_SW_FS: Food Service POS
- PGE_SW_FS_PA: Food Service POS - PGE Costs
- PGE_SW_HVAC_QIQM: Statewide Residential QI/QM
- PGE_SW_HVAC_QIQM_PA: Statewide Residential QI/QM - PGE Costs
- PGE_SW_HVAC_Up_Com: SW HVAC Upstream Commercial
- PGE_SW_HVAC_Up_Com_PA: SW HVAC Upstream Commercial - PGE Costs
- PGE_SW_HVAC_Up_Res: SW HVAC Upstream Residential
- PGE_SW_HVAC_Up_Res_PA: SW HVAC Upstream Residential - PGE Costs
- PGE_SW_IP_Colleges: Institutional Partnerships, UC/CSU/CCC
- PGE_SW_IP_Colleges_PA: Institutional Partnerships, UC/CSU/CCC - PGE Costs
- PGE_SW_IP_Gov: Institutional Partnerships: DGS and DoC
- PGE_SW_IP_Gov_PA: Institutional Partnerships: DGS and DoC - PGE Costs
- PGE_SW_MCWH: Midstream Comm Water Heating
- PGE_SW_MCWH_PA: Midstream Comm Water Heating - PGE Costs
- PGE_SWMEO: Statewide Marketing Education and Outreach
- PGE_SW_NC_NonRes_Ag_electric: SW New Construction NonRes Ag - All Electric
- PGE_SW_NC_NonRes_Ag_electric_PA: SW New Construction NonRes Ag - All Electric - PGE Costs
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- PGE_SW_WET_Work: WET Career and Workforce Readiness
- PGE_SW_WET_Work_PA: WET Career and Workforce Readiness - PGE Costs
- PGE_SW_WP: Water/wastewater Pumping
- PGE_SW_WP_PA: Water/wastewater Pumping - PGE Costs

CEDARS FILING SUBMISSION RECEIPT

The PGE portfolio budget filing has been submitted and is now under review. A summary of the budget filing is provided below.

PA: Pacific Gas & Electric (PGE)

Budget Filing Year: 2027

Submitted: 18:54:28 on 10 Oct 2023

By: Jake Richardson

Advice Letter Number: A.22-02-005

* Portfolio Budget Filing Summary *

- TRC: 1.72
- PAC: 5.56
- TRC (no admin): 2.27
- PAC (no admin): 26.41
- RIM: 3.33
- Budget: \$223,706,399.81
- TotalSystemBenefit: \$1,285,175,291.19
- ElecBen: \$722,728,232.75
- GasBen: \$552,328,362.86
- OtherBen: \$11,203,024.19
- TRCCost: \$748,171,580.99
- PACCost: \$231,147,859.80

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- PGE21012: Commercial Deemed Incentives
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- PGE_SW_HVAC_Up_Com: SW HVAC Upstream Commercial
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- PGE_SW_WET_CC_PA: WET Career Connections - PGE Costs
- PGE_SW_WET_Work: WET Career and Workforce Readiness
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- PGE_SW_WP: Water/wastewater Pumping
- PGE_SW_WP_PA: Water/wastewater Pumping - PGE Costs

**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 Community Choice Association
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

Electrical Power Systems, Inc.
Fresno
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
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