

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 6, 2025

**PG&E AL 7533-E, AL 7533-E-A**

Sydney Bob Dietz II  
Director, Regulatory Relations  
Pacific Gas and Electric Company  
300 Lakeside Dr., Oakland, CA 94612  
c/o Megan Lawson  
E-mail: [PGETariffs@pge.com](mailto:PGETariffs@pge.com)

**SUBJECT:** Proposal of Reallocations of Electric Rule 20A Work Credits

Dear Mr. Dietz,

This disposition letter approves, effective April 9, 2025, Pacific Gas & Electric (PG&E) Supplemental Advice Letter (AL) 7533-E-A. This Supplemental AL meets the requirements listed in Decision (D.) 23-06-008 Ordering Paragraph (OP) 5. AL 7533-E was timely protested by Cal Advocates (PAO), the City of Marysville, the City of Wasco, and the City of Novato. California State Senator Melissa Hurtado submitted a letter of support on behalf of the City of Wasco.

- PAO protested this AL on the grounds that PG&E's proposal to reallocate work credits disregards the purpose of sunseting the program and would increase ratepayer costs, among other things.
- The City of Marysville protested this AL, requesting that PG&E include additional information on existing work credit balances in its filing for transparency.
- The City of Wasco protested this AL, providing new information on a project that the City alleges would meet Rule 20A public interest criteria and argues that work credits should not be reallocated away from the City despite its status as an inactive community.
  - This protest was supported by Sen. Hurtado, who strongly supported the City's objection to the reallocation of work credits away to other projects.
- The City of Novato protested this AL, alleging that its project meets priority criteria as it has not had a Rule 20A project since 2004. The City argues that it should receive work credits for its project.

PG&E submitted a timely Reply to Protests, which:

- Rejects PAO's protest as lacking merit, asserting that its reallocation proposal is within scope of the Commission order and aligns with the purpose of reallocation.
- Responds to the City of Marysville by promising the submittal of a Supplemental AL adding the existing work credit balances to the reallocations table.

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- Responds to the City of Wasco and removes the City's work credits from consideration for reallocation due to the new information presented in the City's Protest.
- Declines the City of Novato's ask for additional work credits as the project is not located within a Disadvantaged Community.

PG&E submitted Supplemental AL 7533-E-A, replacing AL 7533-E in its entirety, to address the City of Marysville and the City of Wasco's requests. Staff have reviewed the Supplemental AL and find that it meets the requirements established in D.23-06-008 OP 5. Staff also find that all Protests to this AL do not meet the criteria laid out in GO 96-B Section 7.4.2: Grounds for Protest and are thus rejected. However, Staff is appreciative that PG&E's Supplemental AL addresses concerns raised by the City of Marysville and the City of Wasco.

Please contact Julian Enis in Energy Division at [Julian.Enis@cpuc.ca.gov](mailto:Julian.Enis@cpuc.ca.gov) if you have any questions.

Sincerely,

*Carla J. Mong (for)*

Leuwam Tesfai  
Deputy Executive Director for Energy and Climate Policy/  
Director of Energy Division  
California Public Utilities Commission

cc: Service List for R.17-05-010  
Jason Ortego, Energy Division

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**Attachment A****Background**

On May 11, 2017, the Commission issued the Order Instituting Rulemaking to Consider Revisions to Electric Rule 20 and Related Matters (R.17-05-010). R.17-05-010 described the procedural history of the Electric Rule 20 program (Rule 20), dating back to 1967. Rule 20 governs utility undergrounding of overhead wires at the request of third parties (e.g., local governments, businesses, and residential customers).

Rule 20A allocates ratepayer-funded work credits to local governments for projects that meet eligibility criteria based on aesthetic considerations. Rule 20B projects may serve any undergrounding purpose, but ratepayers fund approximately 20 to 40 percent of the project costs, and the applicant bears the balance of the project cost. Rule 20C applies when an individual property owner or developer pays for the full cost of undergrounding, less the estimated salvage value and depreciation of the removed overhead electrical facilities. Rule 20D allocated ratepayer-funded work credits to reduce fire risk in high fire risk areas in San Diego Gas & Electric Company (SDG&E) service territory. Rule 20D was discontinued by Decision (D).23-06-008.

On June 3, 2021, the Commission approved D.21-06-013 (Phase 1 Decision), which revised the Rule 20A Program, concluded Phase 1 of the proceeding, and discontinued allocations of new Rule 20A work credits after December 31, 2022.<sup>1</sup> The Commission recognized in D.21-06-013 that some active Rule 20A projects may have insufficient work credit balances and limited available community funding to support project completion, and concluded that Phase 2 should consider whether to take additional steps to support the completion of active Rule 20A projects that are in underserved and/or disadvantaged communities.<sup>2</sup> D.21-06-013 defines an “underserved community” as a city, unincorporated county, or tribal jurisdiction that has not completed a Rule 20A project since 2004, and a “disadvantaged community” is an Environmental and Social Justice (ESJ) community as defined in the ESJ Action Plan 2.0.<sup>3</sup>

On June 8, 2025, D.23-06-008 deemed expired all Rule 20A work credits not deducted from a community’s work credit balance by December 31, 2033, and deemed expired all Rule 20A work credits not allocated to a community by June 8, 2025. OP 4 required Pacific Gas and Electric

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<sup>1</sup> Decision (D). 21-06-013 Phase 1 Decision Revising Electric Rule 20 and Enhancing Program Oversight. Issued June 3, 2021

<sup>2</sup> Decision (D). 21-06-013 Phase 1 Decision Revising Electric Rule 20 and Enhancing Program Oversight. Issued June 3, 2021

<sup>3</sup> The ESJ Action Plan 2.0 defines an ESJ community as census tracts that scored in the top 25 percent of CalEnviroScreen, along with the highest 5 percent of CalEnviroScreen’s Pollution Burden but no overall CalEnviroScreen score, or all federally-recognized tribal lands, or Low-income household with an aggregated household income of less than 80 percent of the area or state median income.

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Company, Southern California Edison Company, San Diego Gas & Electric Company, Bear Valley Electric Service Company, Liberty Utilities, and PacifiCorp (The Utilities) to each file a Tier 1 advice letter to modify its respective Rule 20A tariff and Electric Rule 20 Program Guidebook to provide as follows:<sup>4</sup>

- An Active Rule 20A Project shall be defined as a project with a signed resolution that the utility has designated as either “active” or on “hold.”
- A Rule 20A project that a utility has designated as on “hold” is a project that was initiated but has stopped for an indeterminate amount of time due to the community possessing insufficient work credits to fund the entire project.
- Any Rule 20A work credit that has not been allocated to a community with an Active Rule 20A Project within two years of the effective date of this decision shall be deemed expired.
- Communities shall have the option to contribute financially to any Rule 20A project that has insufficient work credits for completion.
- Any Rule 20A work credit that has not been deducted from a community’s work credit balance by December 31, 2033, shall be deemed expired.
- The utility shall prioritize reallocation of work credits (pursuant to Section 2(c) of Rule 20A) from inactive communities to Active Rule 20A Projects with insufficient work credits such that the reallocation of such work credits is made first to either:
  - Active Rule 20A Projects located in a city, unincorporated county, or tribal jurisdiction that has not completed a Rule 20A project since 2004; or
  - Active Rule 20A Projects where at least 50 percent of the main line trench distance will be located within Environmental and Social Justice Community census tract(s). An Environmental and Social Justice Community census tract shall be defined as a census tract that meets one of the following criteria:
    - scores in the top 25 percent of CalEnviroScreen 4.0,
    - along with those that score within the highest 5 percent of CalEnviroScreen 4.0’s Pollution Burden but do not receive an overall CalEnviroScreen score;
    - located in any federally recognized tribal lands; or
    - where aggregated household incomes are less than 80 percent of area or state median income.

D.23-06-008 OP 5 requires the Utilities to each file a Tier 2 advice letter within 18 months of the effective date of the decision to propose reallocation of Electric Rule 20A work credits in accordance with OP 4. Each utility may only file one Tier 2 advice letter that contains a consolidated list of proposed reallocations. Each Tier 2 advice letter must include:<sup>5</sup>

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<sup>4</sup> Decision (D). 23-06-008 Phase 2 Decision Revising Electric Rule 20 and Establishing Local and Tribal Government Consultation Requirements. Issued June 8, 2023.

<sup>5</sup> Decision (D). 23-06-008 Phase 2 Decision Revising Electric Rule 20 and Establishing Local and Tribal Government Consultation Requirements. Issued June 8, 2023.

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- A detailed narrative explanation of the utility's overall reallocation prioritization process, including an explanation of how the utility's prioritization methodology for selecting projects complies with this Decision;
- An accounting of all inactive communities and final work credit balances to be reallocated, with totals; and
- An accounting of all projects that will receive a reallocation of Rule 20A work credits in the form of a template to be provided by the Commission's Energy Division, including:
  - the information in Attachment A;
  - how many work credits will be reallocated to the eligible project; and
  - short explanation of why the project was selected for reallocation.

D.23-06-008 also closed R.17-05-010.

**Summary of AL 7533-E**

On March 10, 2025, PG&E timely submitted AL 7533-E pursuant to OP 5 of D.23-06-008 and in compliance with Executive Director Peterson's Letter Granting PG&E an Extension of Time to Comply with D.23-06-008. In the AL, PG&E proposed to reallocate \$44.7 million in work credits from 73 inactive communities to 22 projects in active communities that met the prioritization criteria described in D.23-06-008 OP 5.<sup>6</sup>

PG&E's methodology for determining the amount of work credits to be reallocated is described hereafter. In Attachment B to AL 7533-E, PG&E identified 99 total Inactive Communities in its service territory. This number included 23 communities with negative work credit balances which were automatically excluded from consideration. The total work credit balance between the 76 inactive communities with positive work credit balances was \$49.2 million. However, PG&E further withheld the work credit balances for Sand City, Sausalito, and Solano County from reallocation due to pending action for these work credits, making up the \$4.5 million difference between eligible and actual work credits for reallocation and bringing the number of inactive communities whose work credits were to be reallocated down to 73.<sup>7</sup>

PG&E used the following methodology to determine the 22 projects that were to receive work credit reallocations:<sup>8</sup>

- First, PG&E updated the cost information of all projects in the Rule 20A queue. This was done because several projects were proposed many years ago and labor and material costs have changed. PG&E developed a project cost calculator tool using data from 37 projects

<sup>6</sup> Pacific Gas & Electric Advice Letter 7533-E dated March 10, 2025, from 1 to 2

<sup>7</sup> Pacific Gas & Electric Advice Letter 7533-E dated March 10, 2025, at Attachment B

<sup>8</sup> Pacific Gas & Electric Advice Letter 7533-E dated March 10, 2025, from 3 to 4

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from 2019 to 2023 to better forecast costs for these projects. PG&E applied this calculator to the entire queue to update project costs and then developed a multi-year work plan to forecast years in which project costs will be incurred to develop accurate escalation factors.

- PG&E then reviewed projects in the queue that required additional work credits to determine whether those projects met either one or both priority criteria listed in D.23-06-008 OP 4 (see background section above for an in-depth explanation of OP 4 requirements). PG&E discovered that the total reallocation of work credits needed for projects meeting both priority criteria was greater than the total number of work credits available for reallocation. Based on this, PG&E decided to reallocate work credits to projects that met both priority criteria.
- Finally, and since work credit need is greater than work credits available for reallocation, PG&E set a reallocation cap so that all projects on the list created in the last step would receive some work credits. PG&E determined that the cap should be up to \$2,222,333.59 in work credits, which would allow 8 projects to be fully funded with the remaining 14 projects requiring a scope reduction and/or additional financial contribution to close the gap between the projects' expected costs and available work credits.

**Summary of Protests and Letters of Support**

Four parties submitted timely protests to AL 7533-E: The City of Marysville, The City of Wasco, The City of Novato, and Cal Advocates (PAO). One letter of support was submitted by California State Senator Melissa Hurtado's office on behalf of the City of Wasco.

On March 26, 2025, the City of Marysville timely submitted a Protest to AL 7533-E. The City of Marysville stated that its Highway 70 project has standing but is one of the projects that will require scope reduction and/or additional financial contributions to close the gap between available work credits and final project cost.<sup>9</sup> The City of Marysville requested that PG&E rework the table of project reallocations to include a column that shows current work credit balance and recalculate the funding gap for communities with projects that will not be fully funded.<sup>10</sup> The City of Marysville provided two exhibits to support its Protest:<sup>11</sup>

- Exhibit 1 – Rule 20A Work Credit Statement 1/1/2023 thru 12/31/2023
- Exhibit 2 – Email to PG&E Filing of Advice Letter 7533-E to CPUC re\_Rule 20A Reallocation.

<sup>9</sup> The City of Marysville's Protest of AL 7533-E at 1

<sup>10</sup> The City of Marysville's Protest of AL 7533-E at 3

<sup>11</sup> The City of Marysville Exhibits 1 and 2 – Supporting Evidence for Protest of AL 7533-E

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On March 31, 2025, the City of Wasco timely submitted a Protest to AL 7533-E. The City of Wasco states that it is actively planning and designing a new civic center which has electric lines that run through the center of the property. The City states that these lines would be expensive to accommodate, and thus it asks for PG&E's support in undergrounding these lines, as the cost of the project is well below the City of Wasco's current work credit balance.<sup>12</sup>

On March 31, 2025, The City of Novato timely submitted a Protest to AL 7533-E. The City of Novato states that its Novato Boulevard project clearly meets priority criteria and that completion of the Rule 20A project is necessary for the City to enable the completion of road improvements.<sup>13</sup>

On April 1, 2025, PAO timely submitted a Protest to AL 7533-E. PAO alleges that PG&E's proposal to reallocate all remaining work credits from inactive communities ignores the CPUC's intent to prevent ratepayers from funding inefficient and inequitable infrastructure investments by sunseting the program. PAO further alleges that because PG&E is the only utility that is proposing to reallocate all available work credits from inactive communities, it stands apart from how other utilities have implemented the program, and that PG&E's reallocations should thus be limited.<sup>14</sup> PAO further alleges that because D.23-06-008 provides that communities shall have the option to contribute financially to any Rule 20A project that has insufficient work credits, and because PG&E's reallocation to fully fund eight projects forgoes this option in favor of increasing ratepayer costs, these projects should proceed without PG&E's proposed reallocation of ratepayer funds.<sup>15</sup> PAO also alleges that PG&E needs to provide additional information to ensure that the reallocation methodology is reasonable, including current work credit balances, how the per project cap as determined, how PG&E determined which communities should receive the full work credit cap amount, efforts PG&E has taken to communicate with communities, and an indication that communities will proceed with projects even with scope reductions.<sup>16</sup>

On March 31, 2025, California State Senator Melissa Hurtado submitted a letter of support for the City of Wasco's objection to reallocation of work credits. Sen. Hurtado states that since the City of Wasco has already factored the work credit funds into its budget for the civic center project, PG&E should reconsider the reallocation of its work credits.<sup>17</sup>

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<sup>12</sup> The City of Wasco Protest of AL 7533-E at 1

<sup>13</sup> The City of Novato's Protest of AL 7533-E from 1 through 3

<sup>14</sup> Public Advocates Office (PAO) Protest of PG&E AL 7533-E from 1 to 2

<sup>15</sup> Public Advocates Office (PAO) Protest of PG&E AL 7533-E at 2

<sup>16</sup> Public Advocates Office (PAO) Protest of PG&E AL 7533-E at 3

<sup>17</sup> Sen. Hurtado Letter of Support for the City of Wasco at 1

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**Summary of PG&E's Reply to Protests**

On April 8, 2025, PG&E filed its Reply to Protests from the aforementioned parties. In its Reply, PG&E responded to each Protestant individually, as described below:

- Reply to the City of Marysville: PG&E states that although it was not required by D.23-06-008 to provide existing work credit balances for proposed recipients of reallocation, doing so would be beneficial and would add transparency to this process. PG&E states its intent to provide a Supplemental AL that will include this information.<sup>18</sup>
- Reply to the City of Wasco: PG&E summarizes its interactions with the City of Wasco related to the new civic center project. PG&E states that the Protest provides new information that shows that the project would qualify for Rule 20A funding as the right-of-way passes through a civic area. Accordingly, PG&E states its intent to submit a Supplemental AL that removes the City of Wasco's work credits from consideration for reallocation. However, PG&E further states that the City of Wasco must create an underground district and follow ordinance adoption procedures in the Rule 20 Tariff in a timely manner or else it risks staying inactive and having its work credits expire on June 8, 2025.<sup>19</sup>
- Reply to the City of Novato: PG&E does not dispute that the Novato Boulevard project meets the priority criteria in that it has not completed a project since 2004. However, PG&E states that the proposed project location is not considered disadvantaged by the definition set out by the CPUC and used in D.23-06-008 OP 4(f).<sup>20</sup>
- Reply to the Public Advocates Office (PAO): PG&E alleges that PAO's protest is without merit and that the proposed reallocation methodology is within the scope of the Commission's order and aligns with the purpose of reallocation to combat historical inequities in the program. PG&E further characterizes PAO's argument that the proposed reallocations undermine the Commission's intent to lower ratepayer costs as inaccurate, stating that though PAO's opposition to reallocation was acknowledged in D.23-06-008, the Decision states that the amount of work credits, and thus ratepayer funding for the program, is not being increased. PG&E also alleges that PAO's recommendation that PG&E align its reallocation methodologies with other utilities fails to recognize the unique circumstances that each utility faces with the Rule 20 program. PG&E goes on to state that PAO's contention that communities having the option to contribute financially to any Rule 20A project fails to acknowledge that reallocation was meant to address the existing barrier to entry for smaller and disadvantaged communities. In response to PAO's request for

<sup>18</sup> PG&E Reply to Protests at 3

<sup>19</sup> PG&E Reply to Protests from 3 through 4

<sup>20</sup> PG&E Reply to Protests at 4

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additional information, PG&E states its intent to submit a Supplemental AL to include existing work credit balances for communities and remaining work credit balances needed after reallocation. PG&E clarifies its methodology for establishing the per project reallocation cost cap, stating that it is simply the amount of work credits to be reallocated divided by the number of projects that need reallocation. PG&E states that the full reallocation need will be funded if the need is smaller than the cap, and that once the cap alternative is smaller than the need, then the cap is established for the remaining communities. Finally, PG&E states that it has had multiple communications with all participating communities, having hosted two webinars on the sunset of this program, and can confirm that proposed recipients for reallocation do not have the means to self-fund the gap between current estimates and existing work credit balance.<sup>21</sup>

**PG&E Submittal of Supplemental AL 7533-E-A**

On April 8, 2025, PG&E submitted Supplemental AL 7533-E-A on its own accord. Supplemental AL 7533-E-A replaced AL 7533-E in its entirety. PG&E states that the purpose of this supplemental AL is to update the proposed reallocations of Electric Rule 20A work credits in the original AL to withhold the City of Wasco's Rule 20A work credits for a proposed project that meets the public interest criteria. While the reallocation figures have been updated in this supplemental AL, PG&E's reallocation approach and prioritization methodology, as described in the original Advice 7533-E, have not been altered. PG&E also requested that the protest period not be reopened for this AL filing. Staff did not reopen the protest period.

**Discussion**

The reallocation of work credits to active projects was a precedent set in D.21-06-013, which gave the Utilities direction on the accounting of unused work credits for reallocation and notifying communities in need of additional funding.<sup>22</sup> This direction supplements Resolution E-4971, in which the Commission explained that "Rule 20A allows for reallocation of work credits from inactive communities to communities in need. When amounts are not expended or carried over for the community to which they are initially allocated, they shall be assigned when additional participation on a project is warranted or be reallocated to communities with active undergrounding programs."<sup>23</sup>

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<sup>21</sup> PG&E Reply to Protests from 4 through 6

<sup>22</sup> Decision (D). 21-06-013 Phase 1 Decision Revising Electric Rule 20 and Enhancing Program Oversight. Issued June 3, 2021.

<sup>23</sup> Resolution E-4971. Denies Pacific Gas and Electric's request for deviation from Electric Rule 20A in Accordance with General Order 96-B, Section 9.2.3

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Reallocation is not an unrestricted process. Section 4.3 of D.21-06-013 states “that the reallocation provision in Rule 20A is only to be invoked for communities with projects already underway, within existing undergrounding districts, that experience unforeseen funding shortfalls, and have demonstrated that all alternatives for obtaining funding for the project have been exhausted.”<sup>24</sup> Reallocation aims to benefit active projects as defined in D.21-06-013 and Resolution E-9471, and later refined in D.23-06-008 with a prioritization process as outlined in OP 5.

Staff finds that PG&E’s reallocation methodology as detailed in Supplemental AL 7533-E-A is generally consistent with the letter and intent as established in D.23-06-008, as well as the decisions and resolutions presented above. PG&E’s decision to only reallocate work credits to communities that meet both priority criteria as outlined in Section 5.1 and OP 4(f) of the Decision meets the intent of the Decision by balancing the objectives of sunseting the program, reallocating work credits in an equitable manner, and not increasing ratepayer funds available for the program. Using publicly available Geospatial Information System tools, Staff has verified that all listed projects meet the priority criteria. Staff is generally satisfied that PG&E’s reallocation plan meets the criteria established in the Decision.

All protests to this AL are either invalid or have been rendered moot by PG&E’s submission of Supplemental AL 7533-E-A. We discuss each protest individually below:

- **City of Marysville:** The City of Marysville’s Protest did not raise any issues that qualify as grounds for protest with PG&E’s AL, per GO 96-B Section 7.4.2.<sup>25</sup> Indeed, PG&E correctly notes that D.23-06-008 does not require the provision of existing work credit balances to the communities receiving reallocations. In addition, PG&E’s submission of Supplemental AL 7533-E-A includes a revised table of reallocations with information on communities’ existing work credits. Staff appreciates PG&E’s responsiveness to this matter raised by the City of Marysville even though no action was required. Thus, the City of Marysville’s Protest is invalid and was rendered moot.
- **City of Wasco:** The City of Wasco’s Protest did not raise any issues that qualify as grounds for protest with PG&E’s AL, per GO 96-B Section 7.4.2.<sup>26</sup> Instead, the City only provided new information about an existing project and asked for work credits to be reallocated to this project. Nevertheless, PG&E’s submission of Supplemental AL 7533-E-A includes a new reallocation for this project identifying it as one that fits within PG&E’s reallocation methodology, addressing the City of Wasco’s concern. Staff again appreciate PG&E’s response to this matter even though no action was required. Thus, the City of Wasco’s Protest is invalid and was rendered moot.

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<sup>24</sup> Decision (D). 21-06-013 Phase 1 Decision Revising Electric Rule 20 and Enhancing Program Oversight. Issued June 3, 2021

<sup>25</sup> [GO 96-B](#), General Rules, Section 7.4.2: Grounds for Protest (at 13)

<sup>26</sup> *Ibid.*

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- City of Novato: The City of Novato's Protest did not raise any issues that qualify as grounds for protest with PG&E's AL, per GO 96-B Section 7.4.2.<sup>27</sup> Instead, it asked for reallocations to be made to an existing project and argued that this project met the reallocation criteria presented by PG&E. PG&E's response indicated that while the project met one of the requirements, in that it is located in a community where no project was completed after 2004, it did not meet the other requirement of being disadvantaged by the definition established by the CPUC and used in D.23-06-008 OP 4(f). No reallocation was made to this project in the subsequent Supplemental AL filing. Regardless of the above, the fact that the Protest raised no factual or legal issues with the AL renders it invalid.
- PAO: Staff addresses PAO's Protest point-by-point below.
  - PAO alleges that PG&E's plan to reallocate all available work credits from inactive communities violated the intent of D.23-06-008 to prevent ratepayers from funding inefficient and inequitable infrastructure investments, and that PG&E's reallocations should thus be limited. PG&E countered in its Response to Protest, stating that its methodology aligns with the purpose of reallocation to combat historical inequities in the program and that the amount work credits, and thus ratepayer funding for the program, is not being increased by these reallocations. Staff finds that PG&E's reallocation methodology complies with both the letter and intent of D.23-06-008, as it reallocates all available work credits to communities that are both considered disadvantaged as defined in OP 4(f) and that have not completed a project since 2004. The matter of reducing available work credits for reallocation is one that would require relitigation of existing orders, as it is essential to the purposes and method of reallocation and thus should have been taken up in R.17-05-010 when it was open. This matter is inappropriate to litigate through an AL process and thus finds that this facet of PAO's protest is without merit.
  - PAO further alleges that because D.23-06-008 provides that communities shall have the option to contribute financially to any Rule 20A project that has insufficient work credits, and because PG&E's reallocation to fully fund eight projects forgoes this option in favor of increasing ratepayer costs, these projects should proceed without PG&E's proposed reallocation of ratepayer funds. PG&E counters in its Response to Protest that communities having the option to contribute financially to any Rule 20A project fails to acknowledge that reallocation was meant to address the existing barrier to entry for smaller and disadvantaged communities. Staff finds that PG&E's reallocation methodology complies with both the letter and intent of D.23-06-008 in that it gives communities the *option*, rather than the requirement, to

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<sup>27</sup> *Ibid.*

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self-fund projects to bridge gaps in work credit availability.<sup>28</sup> As above, enacting a requirement that PG&E not fully fund projects with work credit shortfalls would require relitigation of existing orders, as it is essential to the purposes and method of reallocation and thus should have been taken up in R.17-05-010 when it was open. Staff concludes that this matter is also inappropriate to litigate through an AL process and thus finds that this facet of PAO's protest is also without merit.

- In Protest, PAO alleges that PG&E needs to provide additional information to ensure that the reallocation methodology is reasonable. In Supplemental AL 7533-E-A, PG&E provides the existing work credit balances of all communities that were to receive reallocations and makes clarifications about the reallocation process. While this information is useful in understanding PG&E's reallocation methodology, it was not required by D.23-06-008. Thus, Staff find that PG&E not providing this information in AL 7533-E does not constitute a material omission, and this facet of PAO's protest is invalid.

Based on the above, Staff finds that PG&E's Supplemental AL 7533-E-A meets the requirements listed in D.23-06-008 OP 5 regarding the reallocation of work credits in the Rule 20 Program, the detailed narrative explanation of the process and methodology, as well as accounting of all inactive communities, and accounting of all projects subject to the reallocation of Rule 20A work credits. All Protests are accordingly dismissed for the reasons stated above. Thus, it is reasonable to approve PG&E's Supplemental AL 7533-E-A as provided.

**Disposition**

Staff hereby approves PG&E's Supplemental AL 7533-E-A in its entirety, with an effective date of April 9, 2025.

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<sup>28</sup> Decision (D). 23-06-008 Phase 2 Decision Revising Electric Rule 20 and Establishing Local and Tribal Government Consultation Requirements. Issued June 8, 2023, Section 5.2.

April 8, 2025

**Advice 7533-E-A**  
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Supplemental: Proposal of Reallocations of Electric Rule 20A Work Credits**

### **Purpose**

Pursuant to Ordering Paragraph (OP) 5 of Decision (D.) 23-06-008 (the Decision), Pacific Gas and Electric Company (PG&E) hereby submits to the California Public Utilities Commission (Commission or CPUC) this Tier 2 Advice Letter (AL) as a supplemental to replace the original Advice 7533-E in its entirety. The purpose of this supplemental AL is to update the proposed reallocations of Electric Rule 20A work credits<sup>1</sup> in the original AL to withhold the city of Wasco's Rule 20A work credits for a proposed project that meets the public Interest criteria. While the reallocation figures have been updated in this supplemental AL, PG&E's reallocation approach and prioritization methodology, as described in the original Advice 7533-E, have not been altered.

### **Background**

As required by D.23-06-008, each utility is to file a Tier 2 advice letter within 18 months of the effective date of the Decision to propose work credit reallocations to Active Rule 20A Projects in accordance with the reallocation prioritization requirements of the Decision. On November 19, 2024, PG&E requested a 90-day extension to give certain communities an opportunity to propose new Rule 20A Projects to avoid having their Rule 20A work credits reallocated. On November 27, 2024, the CPUC informed PG&E that the 90-day extension request was granted.

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<sup>1</sup> The advice letter has been updated to include the existing work credit balances and to reflect the total proposed reallocation amount of 43.4 million for 72 inactive communities, including the removal of work credits for Wasco, resulting in a decrease for the reallocation cap from 2,222,333.59 to 2,132,527.54. The number of fully funded projects has decreased by one (new total is 7), while the number of projects requiring additional funding has increased by one (new total is 15). Updates to attachments A and B have also been made. In Attachment A, the total number of work credits proposed for reallocation for 15 projects that will require a scope reduction and/or additional financial contribution has been updated, along with two typographical error corrections. In Attachment B, the total number of credits proposed for reallocation from inactive communities has been updated.

On March 10, 2025, PG&E submitted the original Advice 7533-E proposing Rule 20A work credit reallocations, and four parties submitted protests in response. The city of Novato (Novato) argued that it should be prioritized for work credit reallocations for its Novato Blvd. project.<sup>2</sup> The city of Marysville (Marysville) requested additional information about work credit balances of communities to receive reallocated work credits.<sup>3</sup> The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) criticized PG&E's choice to reallocate all remaining Rule 20A work credits from inactive communities and asked for additional information.<sup>4</sup> And the city of Wasco protested the original Advice 7533-E by providing information about a design for a new civic center and recently purchased land and asked PG&E to reconsider reallocating its work credits.

On April 8, 2025, PG&E responded to the protests with additional information<sup>5</sup> and agreed not to reallocate Wasco's Rule 20A work credits, as originally indicated. PG&E recognized that additional consideration was appropriate due to the new information that the city provided, more specifically the designing of the multi-facility Civic Center and the recent purchase of land supporting these efforts. With this new information, the proposed project now aligned with Rule 20A public interest criteria four—the street adjoins or passes through a civic area or public recreation area or significant scenic, cultural and/or historic interest to the general public.

With Wasco's original project now qualifying for Rule 20A treatment, PG&E had to adjust the Rule 20A work credit reallocations proposed in the original Advice 7533-E. The new calculations are presented in this supplemental AL and in the attachments included with this submission.

## **Discussion**

PG&E proposes the reallocation of 43.4M in work credits from 72 inactive communities within PG&E's service territory to 22 projects in active communities meeting the prioritization criteria described in the Decision, as shown in the summary table below. For additional details, please see Attachments A and B to this AL. Attachment A contains the required information listed in Attachment A of the Decision, and Attachment B provides an accounting of all inactive communities and final work credit balances to be reallocated with totals, as required by OP 5(b) of the Decision.

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<sup>2</sup> City of Novato Protest to Advice 7533-E, March 31, 2025, at p. 1.

<sup>3</sup> City of Marysville Protest to Advice 7533-E, March 26, 2025, at p. 4. As indicated in PG&E's April 8, 2025 protest reply comments, Rule 20A community work credit balances are already publicly available in PG&E's annual Rule 20 report, submitted on April 1, 2025. This information is also now included in this supplemental AL.

<sup>4</sup> Cal Advocates Protest to Advice 7533-E, April 1, 2025, pp. 1-3.

<sup>5</sup> For additional information, please see PG&E's Reply to Protests to Advice 7533-E – Proposal of Reallocations of Electric Rule 20A Work Credits, submitted on April 8, 2025.

Community	Project	Expected Project Cost * (A)	Work Credit Balance (B)	Work Credit Shortfall (C=A-B)	Proposed Reallocation Amount (D)	Remaining Work Credit Shortfall (E=C-D)
TEHAMA	5TH STREET, TEHAMA	\$ 2,765,000	75,802	2,689,198	2,132,527.54	556,670
SAN JOAQUIN	COLORADO AVE, SAN JOAQUIN	\$ 3,553,000	395,365	3,157,635	2,132,527.54	1,025,107
HURON	LASSEN AVE PH 3, HURON	\$ 5,962,000	225,895	5,736,105	2,132,527.54	3,603,577
SIERRA COUNTY	MAIN STREET, SIERRA CITY	\$ 10,040,000	488,564	9,551,436	2,132,527.54	7,418,908
RIO DELL	WILDWOOD AVE PH 2, RIO DELL	\$ 2,612,000	504,072	2,107,928	2,107,928.11	0
DOS PALOS	BLOSSOM ST, DOS PALOS	\$ 2,907,000	817,708	2,089,292	2,089,292.00	0
ORANGE COVE	EP ANCHOR AVE ORANGE COVE R20A	\$ 4,054,000	1,051,711	3,002,289	2,132,527.54	869,761
WILLITS	SNIDER PARK, WILLITS	\$ 3,067,000	885,426	2,181,574	2,132,527.54	49,046
LAKEPORT	11 ST, LAKEPORT **	\$ 12,251,000	1,070,858	11,180,142	2,132,527.54	9,047,614
RIO VISTA	MAIN ST PH 1, RIO VISTA	\$ 4,041,000	830,509	3,210,491	2,132,527.54	1,077,963
KINGSBURG	10TH AVE ROOSEVELT SCHOOL KINGSBURG R20A	\$ 3,428,000	1,365,406	2,062,594	2,062,594.00	0
ARVIN	VARSITY RD, ARVIN	\$ 6,599,000	933,659	5,665,341	2,132,527.54	3,532,813
COALINGA	ELM AVE PH 1 COALINGA R20A	\$ 2,581,000	1,934,592	646,408	646,408.00	0
FORT BRAGG	CHESTNUT ST PH1, FORT BRAGG	\$ 2,190,000	1,355,923	834,077	834,077.00	0
SHAFTER	SOUTH SHAFTER AVE, SHAFTER	\$ 4,876,000	1,508,451	3,367,549	2,132,527.54	1,235,021
MARYSVILLE	HWY 70, MARYSVILLE	\$ 5,690,000	2,755,994	2,934,006	2,132,527.54	801,478
DINUBA	TRANSIT CENTER BETWEEN L & M ST R20A	\$ 3,341,000	1,387,655	1,953,345	1,953,345.00	0
GRASS VALLEY	LA BARR MEADOWS, GRASS VALLEY R20A **	\$ 9,789,000	2,415,823***	7,373,177	2,132,527.54	5,240,649
SELMA	NEBRASKA AVE, SELMA	\$ 6,405,000	1,898,930	4,506,070	2,132,527.54	2,373,542
MARINA	RESERVATION RD MARINA R20A **	\$ 5,583,000	1,905,932	3,677,068	2,132,527.54	1,544,540
OROVILLE	MYERS ST OROVILLE R20A	\$ 3,188,000	1,460,596	1,727,404	1,727,403.84	0
MANTECA	AIRPORT WAY, MANTECA R20A **	\$ 9,946,000	4,620,644	5,325,356	2,132,527.54	3,192,828
		\$ 114,868,000			43,408,961.05	

\* All project costs have been escalated to expected project start year.

\*\* Project delineating ESJ and non-ESJ communities has been included for reallocation.

\*\*\* Work credit balance includes 1.5 million work credit donation from Nevada County.

In making this reallocation, PG&E recognizes that there are more proposed projects needing additional work credits than work credits available for reallocation. More specifically, municipalities within PG&E's service territory have passed resolutions for 154 projects that will not move forward unless the work credit gap is addressed.

Accordingly, to determine which projects should receive reallocation pursuant to the Decision, PG&E followed the prioritization methodology described in detail below.

#### A. Updating Project Costs

To identify potential Rule 20A projects to receive work credit reallocation, PG&E first needed to update project cost estimates for the full queue of proposed projects in the service territory. Prior to this reallocation effort, proposed Rule 20A projects in the queue were at different phases of the design and scoping process. Also, some of the proposed

Rule 20A projects in PG&E's queue were proposed by municipalities many years ago, and costs for labor and materials have changed. Accordingly, not all PG&E's cost estimates for these proposed Rule 20A projects were still accurate.

To update the proposed project cost estimates, PG&E developed a project cost calculator tool. The tool performed linear regression analyses on quantitative characteristics (e.g. trench length) and qualitative variables (e.g. geographic settings) from 37 Rule 20A projects completed from 2019 to 2023 to identify which combinations yielded the least uncertainty in predicted cost estimates for each project. The tool then used this data to obtain more accurate cost estimates by seeking out combinations that minimized the magnitude of potential variances. Recalculating project costs using this tool was more efficient than individually designing all projects for estimating purposes.

After identifying the updated project costs, PG&E developed a multiyear, Rule 20A workplan for proposed future work. The workplan was informed by the expected Rule 20A program budget in future years, project queue, project financial forecast by month, and forecasted project durations. Creating the workplan also allowed PG&E to forecast what year(s) project costs would be incurred so that the appropriate cost escalation factors could be applied.

#### *B. Reviewing the Priority Criteria*

After recalculating the Rule 20A project costs in the queue, PG&E reviewed which projects require additional work credits to see if the projects meet one or both priority criteria outlined in OP 4 of the Decision. The priority criteria were defined in the Decision as (1) active Rule 20A Projects located in a city, unincorporated county, or tribal jurisdiction that has not completed a Rule 20A project since 2004 or (2) Active Rule 20A Project where at least 50 percent of the main line trench distance will be located within Environmental and Social Justice Community census tract(s).

PG&E sorted the projects into three groups based on the number of priority criteria met by the project scope—i.e., no priority criteria, one priority criteria, or both priority criteria. Upon sorting the proposed projects, PG&E discovered that the total reallocation need for projects meeting both priority criteria was greater than the total work credits available for reallocation.

Ultimately, PG&E chose to propose reallocation only to the group of projects meeting both priority criteria outlined in the Decision and not to projects meeting one or no priority criteria.

#### *C. Reallocation Cap*

Among the Rule 20A projects meeting both priority criteria, there was a wide range in the number of work credits needed to complete the project scope of work. For example, the smallest need for reallocation to cover additional costs was 646K in work credits while the largest need was 11.2M in work credits.

Given this disparity, PG&E set a reallocation cap so that all proposed projects within the group of projects meeting both criteria would receive some reallocation. PG&E determined that this cap should be up to 2,132,527.54 in work credits. This reallocation cap will allow 7 projects to be fully funded. 15 additional projects will either require a scope reduction and/or additional financial contribution to close the gap between the projects' expected costs and available work credits.

### **Protests**

Pursuant to GO 96-B, General Rule 7.5.1, PG&E respectfully requests that the original protest and comment period designated in Advice 7533-E be maintained and that the protest period not be reopened. The rationale for this request is that the reallocation approach and prioritization methodology, as described in the original Advice 7533-E, have not been altered.

### **Effective Date**

Pursuant to General Order (GO) 96-B, Rule 5.2, and OP 5 of D.23-06-008, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on, April 9, 2025, which is the original requested effective date in AL 7533-E.

### **Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list and the parties on the service list for R.17-05-010. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

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Sidney Bob Dietz II  
Director, Regulatory Relations  
CPUC Communications

#### Attachments:

Attachment A: Required Information Regarding Proposed Projects for Reallocation of Rule 20A Work Credits

Attachment B: Inactive Communities and Final Work Credit Balances to be Reallocated

cc: Karin Hieta, Program Manager, Energy Infrastructure, Public Advocates Office  
Vincenzo S. Corazza, Public Works Director, City of Marysville  
Timothy Burke, PE, Interim Director of Public Works, City of Novato  
M. Scott Hurlbert, City Manager, City of Wasco  
Melissa Hurtado, Senator, 16th District  
Aaron Brieno, Chief of Staff & Interim Scheduler, 16th District  
Service List R.17-05-010



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39 E)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Kimberly Loo

Phone #: (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) #: 7533-E-A

Tier Designation: 2

Subject of AL: Supplemental: Proposal of Reallocations of Electric Rule 20A Work Credits

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.23-06-008

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: 4/9/25

No. of tariff sheets: N/A

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

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

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

Tariff schedules affected:

Service affected and changes proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss in AL if more space is needed.

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

California Public Utilities Commission  
Energy Division Tariff Unit Email:  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson  
Title: Director, Regulatory Relations  
Utility/Entity Name: Pacific Gas and Electric Company  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email: PGETariffs@pge.com

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

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

Clear Form

## **Attachment A**

Required Information Regarding Proposed Projects  
for Reallocation of Rule 20A Work Credits

Project Sponsor	Other Project Sponsors	County	City	Utility Undergrounding District	Project Name/Identifier	Project Address (Street, City, ZIP Code)	Applicant Type	Project Status (Active/Hold)	Project Stage (Planning, Estimating/Design, Construction, Closing)	Trench Length (ft)	Length, Estimated or Design	Project Cost (Actual, Non-Adjusted) *	Actual Cost/ Current Estimated At Completion	Current/ Actual Cost per foot	Line Footage of Primary UG Circuit	Project Spend to Date (as of 2/28/2025)	Joint Trench Participants	Public Interest Criteria Met By Project	Percent of Underground Mile in Underserved/ESJ Community by Main Line Trench Distance	Project in Urban/Rural Cluster/Rural (Defined in the American Community Survey)	Work Credit Reallocation for this Specific Project	Reallocation Explanation
TEHAMA	None	TEHAMA	TEHAMA	5TH STREET	5TH STREET, TEHAMA   19-52013-01   NO ORDER	5TH ST, TEHAMA, 96021	Government Agency	Hold	Planning	1,604	Preliminary	\$ 2,765,000	EAC	\$ 1,724	Unknown	\$0	Unknown	Arterial Street or Major Collector	100%	Urban Cluster	\$ 2,132,528	See Note 1 below.
SAN JOAQUIN	None	FRESNO	SAN JOAQUIN	COLORADO AVE	COLORADO AVE, SAN JOAQUIN   20-10047-01   NO ORDER	COLORADO AVE, SAN JOAQUIN, 93660	Government Agency	Hold	Planning	2,002	Preliminary	\$ 3,553,000	EAC	\$ 1,775	Unknown	\$0	Unknown	Arterial Street or Major Collector	100%	Urban Cluster	\$ 2,132,528	See Note 1 below.
HURON	None	FRESNO	HURON	LASSEN AVE PH 3	LASSEN AVE PH 3, HURON   19-10030-01   NO ORDER	LASSEN AVE, HURON, 93234	Government Agency	Hold	Planning	3,869	Preliminary	\$ 5,962,000	EAC	\$ 1,541	Unknown	\$0	Unknown	Arterial Street or Major Collector	100%	Urban Cluster	\$ 2,132,528	See Note 1 below.
SIERRA COUNTY	None	SIERRA	UNINCORPORATED	THE SIERRA CITY MAIN STREET PROJECT AND UUD	MAIN STREET, SIERRA CITY   19-46000-01   NO ORDER	MAIN ST, SIERRA CITY, 96125	Government Agency	Hold	Planning	6,677	Preliminary	\$ 10,040,000	EAC	\$ 1,504	Unknown	\$0	Unknown	Arterial Street or Major Collector	100%	Rural	\$ 2,132,528	See Note 1 below.
RIO DELL	None	HUMBOLDT	RIO DELL	UUD NO. 2	WILDWOOD AVE PH 2, RIO DELL   95-12040-01   NO ORDER	WILDWOOD AVE, RIO DELL, 95562	Government Agency	Hold	Planning	1,605	Preliminary	\$ 2,612,000	EAC	\$ 1,627	Unknown	\$0	Unknown	Civic/Scenic/Historical/Other Interest to General Public	100%	Urban Cluster	\$ 2,107,928	See Note 1 below.
DOS PALOS	None	MERCED	DOS PALOS	BLOSSOM ST, DOS PALOS	BLOSSOM ST, DOS PALOS   19-24006-01   NO ORDER	BLOSSOM ST, DOS PALOS, 93620	Government Agency	Hold	Planning	1,708	Preliminary	\$ 2,907,000	EAC	\$ 1,702	Unknown	\$0	Unknown	Arterial Street or Major Collector	100%	Urban Cluster	\$ 2,089,292	See Note 1 below.
ORANGE COVE	None	FRESNO	ORANGE COVE	ANCHOR AVE	EP ANCHOR AVE ORANGE COVE R20A   16-10039-01   31221681	ANCHOR AVE, ORANGE COVE, 93646	Government Agency	Hold	Planning	2,599	Preliminary	\$ 4,054,000	EAC	\$ 1,560	Unknown	\$2,205	Unknown	Arterial Street or Major Collector	100%	Urban Cluster	\$ 2,132,528	See Note 1 below.
WILLITS	None	MENDOCINO	WILLITS	SNIDER PARK	SNIDER PARK, WILLITS   19-23028-01   NO ORDER	SNIDER PARK ALONG STATE ST, MARIN ST, HUMBOLDT ST, E. COMMERCIAL ST, WILLITS, 95490	Government Agency	Hold	Planning	1,746	Preliminary	\$ 3,067,000	EAC	\$ 1,757	Unknown	\$0	Unknown	Civic/Scenic/Historical/Other Interest to General Public	100%	Urban Cluster	\$ 2,132,528	See Note 1 below.
LAKEPORT	None	LAKE	LAKEPORT	11TH ST	11 ST, LAKEPORT   19-17010-01   NO ORDER	11TH ST, LAKEPORT, 95453	Government Agency	Hold	Planning	8,088	Preliminary	\$ 12,251,000	EAC	\$ 1,515	Unknown	\$0	Unknown	Arterial Street or Major Collector	Project delineates ESJ and non-ESJ communities	Urban Cluster	\$ 2,132,528	See Note 1 below.
RIO VISTA	None	SOLANO	RIO VISTA	MAIN ST PH 1	MAIN ST PH 1, RIO VISTA   19-48010-02   NO ORDER	MAIN ST, RIO VISTA, 94571	Government Agency	Hold	Planning	2,539	Preliminary	\$ 4,041,000	EAC	\$ 1,592	Unknown	\$0	Unknown	Arterial Street or Major Collector	100%	Urban Cluster	\$ 2,132,528	See Note 1 below.
KINGSBURG	None	FRESNO	KINGSBURG	10TH ST (ROOSEVELT SCHOOL)	10TH AVE ROOSEVELT SCHOOL KINGSBURG R20A   04-10000-01   30768527	10TH ST, KINGSBURG, 93631	Government Agency	Hold	Planning	2,173	Preliminary	\$ 3,428,000	EAC	\$ 1,578	Unknown	\$15,022	Unknown	Arterial Street or Major Collector	100%	Urban Cluster	\$ 2,062,594	See Note 1 below.
ARVIN	None	KERN	ARVIN	UUD #1	VARSITY RD, ARVIN   19-15001-01   NO ORDER	VARSITY RD, ARVIN, 93203	Government Agency	Hold	Planning	4,244	Preliminary	\$ 6,599,000	EAC	\$ 1,555	Unknown	\$0	Unknown	Arterial Street or Major Collector	100%	Rural	\$ 2,132,528	See Note 1 below.
COALINGA	None	FRESNO	COALINGA	ELM AVE	ELM AVE PH 1 COALINGA R20A   11-10013-01   74013924	ELM AVE, COALINGA, 93210	Government Agency	Hold	Planning	1,532	Preliminary	\$ 2,581,000	EAC	\$ 1,685	Unknown	\$759	Unknown	Arterial Street or Major Collector	100%	Urban Cluster	\$ 646,408	See Note 1 below.
FORT BRAGG	None	MENDOCINO	FORT BRAGG	CHESTNUT ST	CHESTNUT ST PH1, FORT BRAGG   21-23011-01   NO ORDER	CHESTNUT ST, FORT BRAGG, 95437	Government Agency	Hold	Planning	1,521	Preliminary	\$ 2,190,000	EAC	\$ 1,440	Unknown	\$0	Unknown	Arterial Street or Major Collector	100%	Urban Cluster	\$ 834,077	See Note 1 below.
SHAFTER	None	KERN	SHAFTER	SOUTH SHAFTER AVE	SOUTH SHAFTER AVE, SHAFTER   20-15048-01   NO ORDER	SOUTH SHAFTER AVE, SHAFTER, 93263	Government Agency	Hold	Planning	2,905	Preliminary	\$ 4,876,000	EAC	\$ 1,678	Unknown	\$0	Unknown	Arterial Street or Major Collector	100%	Urban Cluster	\$ 2,132,528	See Note 1 below.
MARYSVILLE	None	YUBA	MARYSVILLE	HWY 70 AND 12TH ST, MARYSVILLE	HWY 70, MARYSVILLE   20-58010-01   NO ORDER	HWY 70, MARYSVILLE, 95901	Government Agency	Hold	Planning	3,392	Preliminary	\$ 5,690,000	EAC	\$ 1,677	Unknown	\$0	Unknown	Civic/Scenic/Historical/Other Interest to General Public	100%	Urban	\$ 2,132,528	See Note 1 below.
DINUBA	None	TULARE	DINUBA	TRANSIT CENTER	TRANSIT CENTER BETWEEN L & M ST R20A   11-54007-01   35543384	L ST & M ST, DINUBA, 93618	Government Agency	Hold	Planning	2,107	Preliminary	\$ 3,341,000	EAC	\$ 1,586	Unknown	\$97,393	Unknown	Civic/Scenic/Historical/Other Interest to General Public	100%	Urban Cluster	\$ 1,953,345	See Note 1 below.
GRASS VALLEY	None	NEVADA	UNINCORPORATED	LA BARR MEADOWS ROAD UNDERGROUND UTILITY DISTRICT	LA BARR MEADOWS, GRASS VALLEY R20A   24-29004-01   NO ORDER	LA BARR MEADOWS RD, GRASS VALLEY, 95949	Government Agency	Hold	Planning	5,798	Preliminary	\$ 9,789,000	EAC	\$ 1,688	Unknown	\$0	Unknown	Arterial Street or Major Collector	Project delineates ESJ and non-ESJ communities	Rural	\$ 2,132,528	See Note 1 below.
SELMA	None	FRESNO	SELMA	NEBRASKA AVE	NEBRASKA AVE, SELMA   20-10049-04   NO ORDER	NEBRASKA AVE, SELMA, 93662	Government Agency	Hold	Planning	4,027	Preliminary	\$ 6,405,000	EAC	\$ 1,591	Unknown	\$0	Unknown	Arterial Street or Major Collector	100%	Urban Cluster	\$ 2,132,528	See Note 1 below.
MARINA	None	MONTEREY	MARINA	RESERVATION RD, UUD# 2008-1	RESERVATION RD MARINA R20A   08-27019-01   30649669	RESERVATION RD, MARINA, 93933	Government Agency	Hold	Planning	3,868	Preliminary	\$ 5,583,000	EAC	\$ 1,443	Unknown	\$9,548	Unknown	Arterial Street or Major Collector	Project delineates between ESJ and non-ESJ communities	Urban	\$ 2,132,528	See Note 1 below.
OROVILLE	None	BUTTE	OROVILLE	MYERS ST	MYERS ST OROVILLE R20A   11-04015-01   30938105	MYERS ST, OROVILLE, 95966	Government Agency	Hold	Planning	1,991	Preliminary	\$ 3,188,000	EAC	\$ 1,601	Unknown	\$86	Unknown	Arterial Street or Major Collector	100%	Urban Cluster	\$ 1,727,404	See Note 1 below.
MANTECA	None	SAN JOAQUIN	MANTECA	UNDER GROUND UTILITY AIRPORT WAY	AIRPORT WAY, MANTECA R20A   24-39013-01   NO ORDER	AIRPORT WAY, MANTECA, 95337	Government Agency	Hold	Planning	5,898	Preliminary	\$ 9,946,000	EAC	\$ 1,686	Unknown	\$0	Unknown	Arterial Street or Major Collector	60% of project in ESJ and remaining 40% delineates ESJ and non-ESJ communities	Urban	\$ 2,132,528	See Note 1 below.

\* All project costs have been escalated to expected project start year.

**Note 1:** Project located in city or unincorporated county that has not completed a Rule 20A project since 2004 and where at least 50 percent of the main line trench distance will be located within Environmental and Social Justice Community (ESJ) census tract(s).

## **Attachment B**

Inactive Communities and Final Work Credit Balances to be Reallocated

Ln	Inactive Community	Work Credit Balances	Work Credits to be Reallocated	Work Credit Balances After Reallocation
1	ALPINE COUNTY	20,011.00	20,011.00	-
2	AMADOR CITY	37,458.00	37,458.00	-
3	AMADOR COUNTY	92,891.45	92,891.45	-
4	ANTIOCH	969,287.17	969,287.17	-
5	ATASCADERO	2,402,852.00	2,402,852.00	-
6	AUBURN	120,804.60	120,804.60	-
7	AVENAL	600,887.00	600,887.00	-
8	BENICIA	1,779,815.00	1,779,815.00	-
9	BIGGS	10,302.00	10,302.00	-
10	BLUE LAKE	261,203.00	261,203.00	-
11	CALISTOGA	571,030.00	571,030.00	-
12	CLEARLAKE	2,344,459.00	2,344,459.00	-
13	CLOVERDALE	622,310.00	622,310.00	-
14	COLFAX	158,643.17	158,643.17	-
15	CORCORAN	52,971.00	52,971.00	-
16	CORNING	499,239.89	499,239.89	-
17	DEL REY OAKS	272,008.00	272,008.00	-
18	GLENN COUNTY	2,543,706.00	2,543,706.00	-
19	GONZALES	367,516.00	367,516.00	-
20	GUADALUPE	457,152.00	457,152.00	-
21	GUSTINE	293,603.00	293,603.00	-
22	HEADSBURG	34,070.87	34,070.87	-
23	HERCULES	824,252.00	824,252.00	-
24	HOLLISTER	601,188.00	601,188.00	-
25	IONE	388,553.00	388,553.00	-
26	ISLETON	319,244.00	319,244.00	-
27	JACKSON	130,285.00	130,285.00	-
28	KERMAN	441,895.00	441,895.00	-
29	KING CITY	93,596.00	93,596.00	-
30	LAFAYETTE	782,546.00	782,546.00	-
31	LASSEN COUNTY	303,380.00	303,380.00	-
32	LATHROP	327,693.53	327,693.53	-
33	LIVINGSTON	548,430.00	548,430.00	-
34	MADERA	419,235.62	419,235.62	-
35	MARICOPA	228,291.00	228,291.00	-
36	MARIPOSA COUNTY	165,414.00	165,414.00	-
37	MENDOTA	627,996.00	627,996.00	-
38	MONTE SERENO	366,701.00	366,701.00	-
39	NEWMAN	912,236.43	912,236.43	-
40	OAKDALE	33,530.59	33,530.59	-
41	OAKLEY	807,676.00	807,676.00	-
42	PASO ROBLES	99,771.82	99,771.82	-
43	PIEDMONT	575,342.00	575,342.00	-
44	PLACER COUNTY	73,879.98	73,879.98	-
45	PLEASANT HILL	1,895,963.36	1,895,963.36	-
46	PLYMOUTH	162,687.00	162,687.00	-
47	RED BLUFF	1,153,627.00	1,153,627.00	-
48	ROCKLIN	341,036.00	341,036.00	-
49	ROSEVILLE	13,343.00	13,343.00	-
50	SACRAMENTO COUNTY	756,783.00	756,783.00	-
51	SAN ANSELMO	661,747.00	661,747.00	-
52	SAN CARLOS	223,044.97	223,044.97	-
53	SAN JUAN BAUTISTA	268,760.00	268,760.00	-
54	SAN RAMON	1,536,447.11	1,536,447.11	-
55	SANGER	944,622.00	944,622.00	-
56	SARATOGA	129,044.00	129,044.00	-
57	SCOTTS VALLEY	876,827.00	876,827.00	-
58	SHASTA COUNTY	2,355,433.49	2,355,433.49	-
59	SHASTA LAKE	6,498.00	6,498.00	-
60	SISKIYOU COUNTY	27,275.00	27,275.00	-
61	SONORA	656,535.00	656,535.00	-
62	ST HELENA	54,788.00	54,788.00	-
63	STANISLAUS COUNTY	293,884.00	293,884.00	-
64	SUISUN CITY	835,227.00	835,227.00	-
65	SUTTER CREEK	442,859.00	442,859.00	-
66	TAFT	892,057.00	892,057.00	-
67	TRINIDAD	2,146.00	2,146.00	-
68	TRINITY COUNTY	13,122.00	13,122.00	-
69	TULARE COUNTY	4,954,134.00	4,954,134.00	-
70	WHEATLAND	281,446.00	281,446.00	-
71	WILLIAMS	28,662.00	28,662.00	-
72	WILLOWS	17,606.00	17,606.00	-
73	ANDERSON *	-	-	-
74	ANGELS CAMP *	-	-	-
75	ATHERTON	-	-	-
76	ATWATER *	-	-	-
77	BELVEDERE *	-	-	-
78	BUTTE COUNTY	-	-	-
79	CAMPBELL *	-	-	-
80	COLMA	-	-	-
81	FIREBAUGH *	-	-	-
82	FOSTER CITY	-	-	-
83	FOWLER *	-	-	-
84	HILLSBOROUGH *	-	-	-
85	LEMOORE *	-	-	-
86	MILL VALLEY *	-	-	-
87	NAPA COUNTY *	-	-	-
88	PLACERVILLE *	-	-	-
89	RIVERBANK *	-	-	-
90	SAN LUIS OBISPO *	-	-	-
91	SAND CITY **	221,664.00	-	221,664.00
92	SAUSALITO **	1,381,141.88	-	1,381,141.88
93	SEASIDE	-	-	-
94	SEBASTOPOL	-	-	-
95	SOLANO COUNTY **	2,925,239.00	-	2,925,239.00
96	SONOMA *	-	-	-
97	WASCO **	1,306,331.00	-	1,306,331.00
98	WOODSIDE	-	-	-
99	YOLO COUNTY	-	-	-
	<b>Total</b>	<b>49,243,336.93</b>	<b>43,408,961.05</b>	<b>5,834,375.88</b>

\* Inactive communities with negative work credit balances are shown as zero for the purposes of this table.  
\*\* Rule 20A work credits were not used for reallocation due to community having pending action for those work credits.

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

AT&T	Ellison Schneider & Harris LLP	Pacific Gas and Electric Company
Albion Power Company		Peninsula Clean Energy
Alta Power Group, LLC	Electrical Power Systems, Inc. Fresno	Pioneer Community Energy
Anderson & Poole	Engie North America	Public Advocates Office
Atlas ReFuel BART	Engineers and Scientists of California	Redwood Coast Energy Authority
Ava Community Energy		Regulatory & Cogeneration Service, Inc.
BART		Resource Innovations
Buchalter	GenOn Energy, Inc.	Rockpoint Gas Storage
Barkovich & Yap, Inc.	Green Power Institute	
Biering & Brown LLP		
Braun Blasing Smith Wynne, P.C.	Hanna & Morton LLP	San Diego Gas & Electric Company
		SPURR
California Community Choice Association	ICF consulting	San Francisco Water Power and Sewer
California Cotton Ginners & Growers Association	iCommLaw	Sempra Utilities
California Energy Commission	International Power Technology	Sierra Telephone Company, Inc.
California Hub for Energy Efficiency	Intertie	Southern California Edison Company
California Alternative Energy and Advanced Transportation Financing Authority	Intestate Gas Services, Inc.	Southern California Gas Company
California Public Utilities Commission		Spark Energy
Calpine	Kaplan Kirsch LLP	Sun Light & Power
Cameron-Daniel, P.C.	Kelly Group	Sunshine Design
Casner, Steve	Ken Bohn Consulting	Stoel Rives LLP
Center for Biological Diversity	Keyes & Fox LLP	
Chevron Pipeline and Power		Tecogen, Inc.
City of Palo Alto	Leviton Manufacturing Co., Inc.	TerraVerde Renewable Partners
City of San Jose	Los Angeles County Integrated	Tiger Natural Gas, Inc.
Clean Power Research		TransCanada
Coast Economic Consulting	Waste Management Task Force	
Commercial Energy	MRW & Associates	Utility Cost Management
Crossborder Energy	Manatt Phelps Phillips	Utility Power Solutions
Crown Road Energy, LLC	Marin Energy Authority	
Communities Association (WMA)	McClintock IP	Water and Energy Consulting
	McKenzie & Associates	Wellhead Electric Company
Davis Wright Tremaine LLP	Modesto Irrigation District	Western Manufactured Housing Communities Association (WMA)
Day Carter Murphy		Yep Energy
Dept of General Services	NOSSAMAN LLP	
Douglass & Liddell	NRG Energy Inc.	
Downey Brand LLP		
Dish Wireless L.L.C.	OnGrid Solar	