

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 30 , 2020

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

Sent via email

SUBJECT: Approval of Pacific Gas and Electric Company Advice Letter 4155-G and supplemental Advice Letter 4155-G-A PG&E's 2018 Capital Expenditures in Compliance with Ordering Paragraph 88 of Decision 19-09-025

Dear Mr. Jacobson:

This letter approves Pacific Gas and Electric Company (PG&E) Advice Letter (AL) 4155-G and supplemental AL 4155-G-A as the ALs comply with Ordering Paragraph (OP) 88 of Decision (D.)19-09-025. That OP directed PG&E to file an AL to report the recorded amount of the capital expenditures the utility intended to add to its 2018 ratebase. The protest of the California Public Advocates Office (CalPA) is rejected based on the reasons stated herein. PG&E AL 4155-G and 4155-G-A are effective October 1, 2019.

Background

In Decision (D.) 19-09-025, the CPUC adopted PG&E's revenue requirement for its gas transmission and storage (GT&S) system for 2019 through 2022. During the proceeding, PG&E's ratebase amount for 2018 was based on the utility's forecast as actual figures were not available at the time. Because of this, D.19-09-025 ordered the utility to file an AL to submit its actual 2018 capital expenditures intended for use in that year's ratebase.¹ A factor in the development of PG&E's 2018 ratebase was the decision's disallowance of approximately \$304 million of estimated pipeline replacement costs incurred by the utility that exceeded authorized levels for the period of 2015 through 2018. Since the disallowance specified in D.19-09-025 was also based on a PG&E forecast, the utility was directed by D.19-09-025 to file an AL showing the recorded cost overruns so that the actual disallowance could be determined.²

PG&E filed the following ALs to comply with D.19-09-025. In AL 4155-G, PG&E stated that it intended to add \$700.1 million to its ratebase in 2018 which represented the recorded amount less certain exclusions including the disallowance. In supplemental AL 4155-G-A, PG&E updated the information in the original AL and reduced the 2018 ratebase amount to \$672.1 million. This

¹ D.19-09-025 OP 88.

² D.19-09-025 OP 94.

revision reflected an adjustment to the decision's pipeline replacement disallowance from approximately \$304 million to \$237.3 million. In the supplemental AL, PG&E explained that the reduction in the disallowance was developed using the actual recorded costs for the replacement overruns pursuant to D.19-09-025. The utility also filed AL 4162-G, concurrently with AL 4155-G-A, to comply with D.19-09-025 confirming that the amount of the actual pipe replacement cost overrun was \$237.3 million. PG&E AL 4162-G was not protested and approved on March 27, 2020.

Additionally, on October 23, 2019, PG&E filed an Application For Rehearing (AFR) of D.19-09-025 in which the utility, among other things, claimed that the CPUC committed various legal and factual errors in disallowing costs related to the pipe replacement program. The AFR is currently pending before the CPUC.

CalPA Protest

On December 10, 2019, CalPA protested PG&E AL 4155-G-A. The protestant requested that the CPUC reject the AL because the utility failed to show that the filing met the requirements of D.19-09-025. Specifically, CalPA indicated that the 2018 amount PG&E provided for the pipeline replacement overrun in the AL was the same amount that the utility submitted in its AFR and, thus, any revised disallowance amount should be addressed in that proceeding. Because the AFR is currently pending, CalPA recommended that PG&E should not reduce the disallowance and keep it at the estimated amount of \$304 million specified in D.19-09-025 until the AFR is decided.

PG&E Protest Reply

On December 10, 2019, PG&E replied to CalPA's protest. The utility contested CalPA's argument that the \$304 million disallowance must stand until the AFR is decided and stated that the ALs were filed in compliance with D.19-09-025. PG&E also claimed that AL 4155-G and supplemental AL 4155 G-A must be viewed in the context of AL 4162-G. AL 4162-G was filed pursuant to D.19-09-025 OP 94 and contained the revised pipeline replacement disallowance of \$237.3 million based on the actual costs incurred by PG&E, which is an element in the development of the 2018 ratebase. The utility argued it must follow the dictates of D.19-09-025, which remain unaffected by the AFR at present.

Discussion and Determination

Energy Division's (ED) review finds that PG&E AL 4155-G and supplemental AL 4155-G-A complies with D.19-09-025. PG&E correctly asserted that the filing of the AFR and its current status as pending does not override the provisions and implementation of D.19-09-025, including OPs 88 and 94 of the decision. While the CPUC's disposition of the AFR may ultimately result in altering some aspects of D.19-09-025, there is no authorization presently in effect for maintaining the \$304 million estimate for the pipeline replacement and, as CalPA recommended, disregarding the revised disallowance amount based on the actual incurred expenses the utility was required to file pursuant to D.19-09-025.³

³ D.19-09-025 OP 94.

Therefore, PG&E AL 4155-G and supplemental AL 4155-G-A are approved. The protest of CalPA is hereby denied.

Sincerely,

Handwritten signature in black ink, appearing to read "ER" followed by "(FOI)" in parentheses.

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

cc: Nika Kjensli
Program & Project Supervisor
Energy Cost of Service Branch
Public Advocates Office
NLR@cpuc.ca.gov

October 18, 2019

Advice 4155-G-A

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Supplemental: PG&E's 2018 Capital Expenditures in Compliance with Ordering Paragraph 88 of Decision 19-09-025

Purpose

This advice letter supplements previously submitted Pacific Gas and Electric's (PG&E) Advice Letter 4155-G, *PG&E's 2018 Capital Expenditures in Compliance with Ordering Paragraph 88 of Decision 19-09-025*, submitted October 1, 2019.

Background

On October 1, 2019, PG&E submitted Advice 4155-G in compliance with Ordering Paragraph (OP) 88 in Decision (D.) 19-09-025 (the Decision) addressing PG&E's 2019 Gas Transmission and Storage (GT&S) application. PG&E submits this supplemental advice letter to update information previously provided related to its 2018 Capital Expenditures.

Capital Expenditures

PG&E has compiled and submits an updated Attachment A to supersede in full the Attachment A that was previously submitted, which provides the recorded capital expenditures for the year ended 2018, by major work category. In total, PG&E incurred \$959.3 million in 2018 capital expenditures. Consistent with Advice Letter 4155-G, PG&E has adjusted Attachment A to exclude the following items, which will not be added to rate base. This results in \$672.1 million in 2018 recorded capital expenditures that PG&E intends to add to rate base.

- Line 407 capital expenditures subject to a memorandum account.

- Transmission Integrity Management Program one-way balancing account (TIMPBA) overspend for 2015-2018.¹
- Safety Spend penalty adjustment related to Casings.
- Vintage Pipeline Replacement disallowance for 2015-2018 cost overruns.

Based on PG&E's 2016 and 2017 recorded, and 2018 forecasts for the Vintage Pipeline Replacement Program, the Commission decided that PG&E should remove approximately \$304 million in costs for this program (over the 2015-2018 period) as insufficiently justified "cost overruns" relative to the forecast the Commission adopted in D.16-06-056. (D.19-09-025, *mimeo*, pp.158-159.) However, that amount was calculated based on a forecast for 2018 work, not on actual recorded costs. PG&E interprets D.19-09-025 as disallowing PG&E's actual cost overruns, and Ordering Paragraph 94 requires PG&E to file "a Tier 2 Advice Letter that provides the actual amount of cost overruns associated with pipe replacement in lieu of hydrostatic testing projects² from 2015-2018."

PG&E is filing the Advice Letter required by Ordering Paragraph 94 concurrent with this supplement. Accordingly, PG&E has updated the data set provided to The Utility Reform Network (TURN) in TURN_015-Q01Atch01 upon which TURN's calculation of the recommended disallowance for 2016-2018, adopted by the Commission in D.19-09-025, was based. Consistent with the requirement of OP 94, PG&E has also included data related to 2015,³ resulting in total cost overruns from 2015-2018 of \$237.3 million for the Vintage Pipeline Replacement Program. See Attachment B to support the calculation of the \$237.3 million, which replaces previously submitted Attachment B in its' entirety. For completeness and to illustrate that PG&E's actual cost overrun calculation is consistent with TURN's calculation (with the exception of PG&E's use of recorded costs provided in nominal dollars as the "authorized" unit costs relied upon by TURN were escalated), Attachment B also includes tabs supporting the calculation of the forecast \$304.2 million.

Protests

Pursuant to GO 96-B, General Rule 7.5.1., PG&E is extending the protest period originally provided in Advice Letter 4155-G. Anyone wishing to protest Advice Letter 4155-G or this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than

¹ Attachment A of this Advice Letter updates the previously submitted TIMPBA adjustment from \$44 million as reported in Advice 4155-G to \$36 million. Advice 4155-G provided the recorded accounting for probable disallowance on estimated cost overruns in accordance with Accounting Standard Codification (ASC 980-360) Regulated Enterprises – Accounting for Abandonment and Disallowances of Plant Costs and included estimates related to the 2019 period. The number reflected in updated Attachment A provides the costs related to actual overspend in 2018.

² The actual program at issue is PG&E's Vintage Pipe Replacement Program; D. 19-09-025 erroneously describes it as pipe replacements in lieu of hydrostatic testing.

³ The disallowance adopted by the Commission was based on TURN's recommendation reflected in Exhibit TURN-19 (Supporting Attachments to Chapter 5B) that only reflected 2016-2018. PG&E's calculation reflects Vintage Pipeline Replacement projects that became operative from 2015-2018.

November 7, 2019, which is 20 days after the date of this submittal. Protests must be submitted to:

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

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

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

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

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

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

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

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.1, and OP 88 of D.19-09-025, this supplemental advice letter is submitted with a Tier 1 designation. In conjunction with original Advice Letter 4155-G, this supplemental Tier 1 advice letter is effective October 1, 2019.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for A.17-11-009. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List A.17-11-009



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 G)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Yvonne Yang

Phone #: (415)973-2094

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: Yvonne.Yang@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) #: 4155-G-A

Tier Designation: 1

Subject of AL: Supplemental: PG&E's 2018 Capital Expenditures in Compliance with Ordering Paragraph 88 of Decision 19-09-025

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.19-09-025

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: 10/1/19

No. of tariff sheets: 0

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

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

¹Discuss in AL if more space is needed.

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

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

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2094
Facsimile (xxx) xxx-xxxx:
Email:

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

Advice Letter 4155-G-A - Attachment A**2018 GT&S Actual CapEx for the Advice Letter Filing Pursuant to OP 88 in 2019 GT&S Rate Case Decision (D.) 19-09-025**

\$ in thousands

MWC	MWC description	2018 CapEx
		Actual
04	Fleet / Auto Equip	1,115
05	Tools & Equipment	4,974
12	Implement Environment Projects	(1,432)
21	Misc Capital	(444)
23	Implement RealEstate Strategy	-
26	GT Customer Connects	2,405
44	Gas Capital:GasTrans-Sub	2,100
73	GT Pipeline Capacity	33,362
75	GT Pipeline Reliability	485,638
76	GT Station Reliability	184,329
78	Manage Buildings	1,611
83	GT WRO	3,581
84	GT Gas Gathering System Manage	5,559
98	GT Integrity Management	82,129
2F	Build IT Apps & Infra	14,943
2J	GT&D Impl Regulatory Change	(503)
3K	Gas Trans Remediate Corrosion	90,799
3L	Gas Trans Storage Wells	48,504
3N	Security Install/Replace	620
Total 2018 GT&S Recorded CapEx		959,289
CapEx Adjustments		
	L407 CapEx Subject to Memorandum Account	(3,659)
	TIMPBA Overspend (one-way balancing account)	(36,000)
	Safety Spend Penalty Adjusting Related to Casings	(10,292)
	D.19-09-025 Pipe Replacement Overruns ⁽¹⁾	(237,265)
Total CapEx Adjustments		(287,216)
Net 2018 GT&S Recorded CapEx Intended to be Reflected in Rate Base		672,073

⁽¹⁾ Recommended \$304.2 million disallowance adjusted to \$237.3 million reflect recorded costs for 2015-2018. PG&E will include the total capex adjustment as a reduction in 2018 capex, and will not alter for 2016 and 2017 in the RO model.

PG&E Actual Vintage Pipeline Replacement Cost Overrun Calculation Based on TURN's Approach in Exhibit TURN-19 (Supporting Attachments to Ch. 5B)

From "Vintage Pipe 2015-2018 Data" Tab = TURN unit cost (Exhibit TURN-19)				= C * D	= C	From "Vintage Pipe 2015-2018 Data" Tab			= E11, E16, E21, E26	= J11, J16, J21, J26	= M-N			
"Authorized" per TURN					Recorded	Recorded			Recalculated TURN Disallowance					
	Diameter	Miles	Cost/Mile	Total	Diameter	Miles	Recorded Cost (Nominal \$)			Authorized	Recorded	Disallowance		
2015	<12"	0.14	\$5,131,898	\$728,730	2015	<12"	0.14	\$6,272,790			2015	\$27.3	\$66.6	(\$39.4)
	12-22"	3.05	\$4,176,068	\$12,737,007		12-22"	3.05	\$16,071,444			2016	\$53.0	\$111.3	(\$58.2)
	>24"	1.67	\$8,249,726	\$13,785,291		>24"	1.67	\$44,293,103			2017	\$25.4	\$79.3	(\$53.9)
		4.863		\$27,251,028			4.863	\$66,637,336			2018	\$153.5	\$252.1	(\$98.6)
2016	<12"	2.69	\$5,249,932	\$14,122,317	2016	<12"	2.69	\$41,493,626						
	12-22"	1.18	\$4,272,118	\$5,041,099		12-22"	1.18	\$5,117,538						
	>24"	4.01	\$8,439,469	\$33,842,271		>24"	4.01	\$64,639,000						
		7.88		\$53,005,687			7.88	\$111,250,165						
2017	<12"	0.00	\$5,386,430	\$0	2017	<12"	0	\$401,465						
	12-22"	1.13	\$4,383,193	\$4,931,092		12-22"	1.13	\$23,146,988						
	>24"	2.37	\$8,658,895	\$20,504,263		>24"	2.37	\$55,756,775						
		3.493		\$25,435,355			3.493	\$79,305,229						
2018	<12"	1.35	\$5,526,477	\$7,460,744	2018	<12"	1.35	\$15,855,376						
	12-22"	5.69	\$4,497,156	\$25,588,818		12-22"	5.69	\$87,006,324						
	>24"	13.56	\$8,884,027	\$120,467,406		>24"	13.56	\$149,219,563						
		20.6		\$153,516,968			20.6	\$252,081,263						
Total	36.836		\$259,209,039		Total	36.836	\$509,273,992							

Commission Decision (D.19-09-025)			= O12
TURN Recommendation (based on actual completed miles)			(\$250.1)
Less: Supported Project Overruns in 2016 (R-503)			\$12.8
Disallowance			(\$237.3)

D.19-09-025 - \$304.2M Disallowance Calculation Based on TURN's Approach in Exhibit TURN-19 (Supporting Attachments to Ch. 5B)

From "PGE-TURN_015-Q01Atch01" Tab = TURN unit cost (Exhibit TURN-19) = C * D = C From "PGE-TURN_015-Q01Atch01" Tab = E16, E21, E26 = J16, J21, J26 = M - N

"Authorized" per TURN

Recorded

Year	Diameter	Miles	Cost/Mile	Total	Diameter	Miles	Recorded/ Forecast Cost
							(2016 \$)
Not included in TURN's calculation of the recommended disallowance							
2015							
2016	<12"	2.69	\$5,249,932	\$14,122,317	2016	<12"	\$41,362,365
	12-22"	0.00	\$4,272,118	\$0		12-22"	\$0
	>24"	3.06	\$8,439,469	\$25,824,775		>24"	\$66,000,870
	5.75			\$39,947,092		5.75	\$107,363,235
2017	<12"	0.00	\$5,386,430	\$0	2017	<12"	\$0
	12-22"	0.89	\$4,383,193	\$3,901,042		12-22"	\$19,969,631
	>24"	2.37	\$8,658,895	\$20,504,263		>24"	\$52,303,511
	3.258			\$24,405,305		3.258	\$72,273,142
2018	<12"	2.90	\$5,526,477	\$16,026,783	2018	<12"	\$43,940,728
	12-22"	6.37	\$4,497,156	\$28,646,884		12-22"	\$128,111,278
	>24"	12.98	\$8,884,027	\$115,314,670		>24"	\$189,727,077
	22.25			\$159,988,337		22.25	\$361,779,083
Total		31.258		\$224,340,735	Total	31.258	\$541,415,460

TURN Recommended Disallowance (Opening Brief, Table 18 and 19)

Year	Authorized	Recorded	Disallowance
2015	<i>Not included in TURN's calculation of the recommended disallowance</i>		
2016	\$39.9	\$107.4	(\$67.4)
2017	\$24.4	\$72.3	(\$47.9)
2018	\$160.0	\$361.8	(\$201.8)
	\$224.3	\$541.4	(\$317.1)

Commission Decision (D.19-09-025)

= 012

TURN Recommendation*		(\$317.0)
Less: Supported Project Overruns in 2016 (R-503)		\$12.8
Disallowance		(\$304.2)

* Rounded by Commission to \$317.0M in decision

ID	Project Description	Route	Begin Station	End Station	Project Length (ft)	Project Length (mi)	Driver Tier	Diameter (in)	IOC	TIMP Risk	HCA?	Land Movement Threat	L (mi) X D (in)	Engineering Job Estimate 2016\$, NCM	Recorded Cost 2016\$, NCM	Completed / Closed Year
R-008B	R-008B L-108 0.8MI MP 39.47-40.27 Replace	108	93,233	98,521	5,288	0.80	1	24	16	33,054	Yes	Low	19.20	\$6,448,167	\$5,767,822	2016
R-303	R-303 L-132 0.34MI MP 0.93-1.87 VTA Replace	132	5,018	6,807	1,789	0.34	1	24	15	39,788	Yes	Medium	8.16	\$4,127,753	\$4,697,897	2016
R-309A	R-309A L-107 1.15MI MP 31.22-32.37 Replace BALIP	107	164,780	170,236	5,445	1.15	1	24	199	46,868	Yes	Low	27.60	\$35,356,511	\$43,433,176	2016
R-350B	R-350B L-131 0.25MI MP 35.05-35.30 Betterment Replace	131	184,500	187,467	2,967	0.25	1	24	59	43,016	Yes	Low	6.00	\$1,216,246	\$2,198,763	2016
R-502	R-502 L-050A 1 0.87MI MP 11.03-11.9 Replace 8" Pipe	050A	46,764	51,758	4,993	0.87	1	8.625	335	44,135	Yes	Low	7.50	\$10,203,693	\$9,495,628	2016
R-503	R-503 L-050A 2 1.82MI MP 16.81-18.41 Replace 8" Pipe	050A	79,227	87,227	8,000	1.82	1	8.625	998	43,661	Yes	Low	15.70	\$44,950,000	\$31,866,737	2016
R-824	R-824 L-153 0.52MI MP 25.96-26.48 Replace	153	139,760	142,159	2,399	0.52	1	24	44	63,822	Yes	Medium	12.48	\$11,224,378	\$9,903,213	2016
R-149	R-149 L-153 0.12MI MP 3.45-3.57 Replace	153	18,649	19,337	1,259	0.16	1	30	70	56,344	Yes	Low	4.80	\$12,477,375	\$13,332,414	2017
R-310	R-310 0.03MI MP 0 Rebuild Walnut Crossover BALIP	131	22,025	110,765	114	0.03	1	24	0	24,961	No	Medium	0.72	\$4,253,970	\$3,249,234	2017
R-349B	R-349B L-101 0.54MI MP 12.33-12.87 Vintage	101	68,281	71,332	3,050	0.61	1	20	226	46,392	Yes	Medium	12.20	\$19,337,043	\$6,501,361	2017
R-414	R-414 L-109 2.21MI MP 46.00-48.21 Replace 26" Liner	109	244,610	255,980	11,370	1.99	1	26	5,058	51,532	Yes	Low	51.69	\$56,246,371	\$29,102,655	2017
R-501	R-501 L-153 0.05MI MP 7.34-9.18 Replace 30" Pipe	153	38,724	39,227	503	0.05	1	30	142	55,378	Yes	Medium	1.50	\$3,849,871	\$3,064,926	2017
R-504	R-504 L-153 4 0.14MI MP 5.32-5.46 Replace 30" Pipe	153	28,606	29,363	757	0.14	1	30	6	47,690	Yes	Medium	4.20	\$2,266,216	\$3,554,281	2017
R-514	R-504 L-153 4 0.14MI MP 5.32-5.46 Replace 30" Pipe	100	730,914	731,060	147	0.14	1	20	38	55,150	Yes	Medium	2.80	\$3,431,536	\$4,756,359	2017
R-517	R-504 L-153 4 0.14MI MP 5.32-5.46 Replace 30" Pipe	1818-01	13,612	14,820	1,208	0.14	1	12.75	141	47,795	Yes	High	1.79	\$10,227,746	\$8,711,911	2017
R-1050	R-1050 DFM-1818-01 0.06MI MP 0.0-0.12 Replace PB-39	1818-01	0	347	344	0.06	3	12.75	30	24,238	Yes	Medium	0.77	\$1,321,457	N/A	2018
R-188C	R-188C L-220 0.29MI MP 19.37-19.69 Replace	220	101,019	103,576	2,558	0.29	1	10.75	20	47,462	Yes	Medium	3.12	\$3,658,831	N/A	2018
R-309B	R-309B L-107 1.18MI MP 32.37-33.55 Replace BALIP	107	172,316	174,887	2,571	1.18	1	22	18	47,250	Yes	Medium	25.96	\$42,595,309	N/A	2018
R-361	R-361 DFM-3001-01 1.09MI MP 2.05-3.11 Capacity	3001-01	11,254	16,343	4,810	1.06	1	4.5	19	49,054	No	Medium	4.77	\$18,139,256	N/A	2018
R-361B	R-361B DFM-3001-01 1.09MI MP 2.02-2.05 Capacity	3001-01	10,768	11,254	486	0.03	1	4.5	0	45,114	No	Low	0.14	\$377,615	N/A	2018
R-506	R-506 DFM-0401-01 1.28MI MP 2.27-3.55 Replace	0401-01	11,860	18,836	6,975	1.28	1	16	1,051	50,375	Yes	Medium	20.48	\$24,341,970	N/A	2018
R-508	R-508 L-105N 0.28MI MP 28.13-30.27 Replace 24" Pipe PB-28	105N	159,308	162,136	2,808	0.28	1	30	161	56,474	Yes	Low	8.40	\$10,647,850	N/A	2018
R-510	R-510 L-153 2.28MI MP 23.77-26.05 Replace Vintage Pipe PB-28	153	127,092	140,314	13,222	2.22	1	24	2,199	72,257	Yes	Low	53.28	\$55,024,270	N/A	2018
R-511	R-511 L-153 1.26MI MP 26.62-27.88 Replace Vintage Pipe PB-28	153	142,775	148,744	5,932	1.61	1	24	1,443	54,141	Yes	Low	38.64	\$67,746,437	N/A	2018
R-515	R-515 L-108 3.95MI MP 45.95-49.19 Replace 24" Pipe	108	133,898	151,449	17,550	3.95	1	24	40	51,743	Yes	High	94.80	\$28,205,153	N/A	2018
R-612	R-612 L-210B 0.68MI MP 13.75-14.53 Replace 3600ft	210B	77,039	81,014	3,975	0.68	1	16	63	47,664	Yes	Low	10.88	\$6,263,624	N/A	2018
R-649	R-649 L-131 0.14MI MP 31.83-32.38 Replace	131	169,879	169,962	83	0.12	1	24	0	27,930	Yes	Medium	2.88	\$1,841,395	N/A	2018
R-700	R-700 L-131 3.83MI MP 28.00-31.83 Replace 24" Vintage PB-27	131	148,144	168,309	20,165	3.83	1	24	16	23,178	No	Medium	91.92	\$19,545,018	N/A	2018
R-707	R-707 L-131 0.96MI MP 27.02-28.00 Replace 5100ft of 24" PB-27	131	143,470	148,144	4,674	0.97	1	24	2	19,087	No	Medium	23.28	\$6,716,954	N/A	2018
R-917	R-917 DFM-1817-01 1.44MI MP 1.25-2.0 Replace PB-40B	1817-01	6,453	10,618	4,152	1.52	1	10.75	319	46,450	Yes	Low	16.34	\$21,765,026	N/A	2018
R-964	R-964 DFM-1818-01 0.59MI MP 0.17-0.48 Replace PB-39	1818-01	1,212	1,940	728	0.59	1	12.75	76	43,930	Yes	Medium	7.52	\$11,332,629	N/A	2018
R-966	R-966 L-101 1.76MI MP 27.07-28.85 Replace PB-38	101	148,409	157,729	8,615	1.76	1	20	1,545	47,361	Yes	Low	35.20	\$25,721,160	N/A	2018
R-967	R-967 L-101 0.62MI MP 33.06-33.68 Replace PB-38	101	181,676	185,483	3,668	0.62	1	20	185	48,208	Yes	Low	12.40	\$12,450,891	N/A	2018
RT-969	RT-969 DFM-3012-01 0.1515MI MP 0.027-0.172 Replace	3012-01	110	950	841	0.20	3	12.75	91	31,139	Yes	Low	2.55	\$4,084,239	N/A	2018

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

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	East Bay Community Energy	Praxair
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	
	Energy Management Service	
Alta Power Group, LLC	Engineers and Scientists of California	Redwood Coast Energy Authority
Anderson & Poole	Evaluation + Strategy for Social Innovation	Regulatory & Cogeneration Service, Inc.
	GenOn Energy, Inc.	SCD Energy Solutions
Atlas ReFuel	Goodin, MacBride, Squeri, Schlotz & Ritchie	
BART	Green Charge Networks	SCE
	Green Power Institute	SDG&E and SoCalGas
Barkovich & Yap, Inc.	Hanna & Morton	
P.C. CalCom Solar	ICF	SPURR
California Cotton Ginners & Growers Assn	International Power Technology	San Francisco Water Power and Sewer
California Energy Commission	Intestate Gas Services, Inc.	Seattle City Light
California Public Utilities Commission	Kelly Group	Sempra Utilities
California State Association of Counties	Ken Bohn Consulting	Southern California Edison Company
Calpine	Keyes & Fox LLP	Southern California Gas Company
	Leviton Manufacturing Co., Inc. Linde	Spark Energy
Cameron-Daniel, P.C.	Los Angeles County Integrated Waste Management Task Force	Sun Light & Power
Casner, Steve	Los Angeles Dept of Water & Power	Sunshine Design
Cenergy Power	MRW & Associates	Tecogen, Inc.
Center for Biological Diversity	Manatt Phelps Phillips	TerraVerde Renewable Partners
City of Palo Alto	Marin Energy Authority	Tiger Natural Gas, Inc.
	McKenzie & Associates	
City of San Jose	Modesto Irrigation District	TransCanada
Clean Power Research	Morgan Stanley	Troutman Sanders LLP
Coast Economic Consulting	NLine Energy, Inc.	Utility Cost Management
Commercial Energy	NRG Solar	Utility Power Solutions
County of Tehama - Department of Public Works		Utility Specialists
Crossborder Energy	Office of Ratepayer Advocates	
Crown Road Energy, LLC	OnGrid Solar	Verizon
Davis Wright Tremaine LLP	Pacific Gas and Electric Company	Water and Energy Consulting Wellhead Electric Company
Day Carter Murphy	Peninsula Clean Energy	Western Manufactured Housing Communities Association (WMA)
		Yep Energy
Dept of General Services		
Don Pickett & Associates, Inc.		
Douglass & Liddell		