

December 15, 2025

Advice 5153-G

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Notification of Planned Deration/Downrate of Gas Transmission

Pipelines 0618-03 Mile Point (MP) 0-3.52, 0618-05 MP 0-1.41, 0618-10 MP

0-1.47, and District Regulation Route 4093 MP 0-1.75.

Purpose

Pacific Gas and Electric Company (PG&E) submits this Informational-only advice letter to provide notification of a planned transmission pipeline deration/downrate¹. Pursuant to the California Public Utilities Commission (Commission or CPUC) Decision (D.) 23-12-003 issued December 21, 2023 in the Commission's Order Instituting Rulemaking (OIR) to Establish Policies, Processes, and Rule to Ensure Safe and Reliable Gas Systems in California and Perform Long-Term Gas System Planning (Gas System Planning) (R.) 20-01-007, the advice letter is filed in compliance with Ordering Paragraph (OP) 3 and Attachment B.

Background

In December 2023, the Commission issued Decision (D.) 23-12-003, *Phase 2 Issues Regarding Transmission Pipelines and Storage*, which, among other items, established criteria and a regulatory review process for transmission pipeline derates/downrates effective January 1, 2024. The Decision established the following criteria:

- 1. Utilities must consider for derating or decommissioning all transmission pipelines that are no longer needed at total nominal capacity to meet design standards or state or federal safety requirements, to ensure electric reliability, to serve hard-to-electrify customers, or to provide for the redundancy needed to allow for routine maintenance.
- 2. If a transmission pipeline is not needed at its total nominal capacity but cannot deliver sufficient fuel to meet demand at less than 20 percent Specified Minimum Yield Strength it should not be considered for deration.

¹ PG&E uses the term "downrate," which is equivalent to the Decision's term "derate."

- 3. Before gas assets are derated or decommissioned, replacement energy sources must be built and operational or demand must have declined sufficiently to avoid the system falling below reliability standards or otherwise losing the ability to meet local customers' energy needs.
- 4. Utilities must notify the Commission of planned derations in an information-only submittal provided at least 30 days prior to executing a planned transmission pipeline deration. Information-only submittals for derating projects underway at the time this decision is issued shall be provided as soon as practicable.
- 5. Utilities must serve the information-only submittals to parties to Rulemaking (R.) 20-01-007 and any subsequent long-term gas planning proceeding.
- 6. The information-only submittal must:
 - a. Provide information about each transmission pipeline to demonstrate that it is no longer needed at total nominal capacity.
 - b. Demonstrate that the new distribution pipeline is needed to serve customers;
 - c. Summarize the anticipated costs of the proposed deration.

Consistent with the Commission's directive, Attachment A to this Advice letter provides the required information described in item six above for the downrate of transmission lines 0618-03 Mile Point (MP) 0-3.52, 0618-05 MP 0-1.41, 0618-10 MP 0-1.47, and District Regulation Route (DREG) 4093 MP 0-1.75.

This submittal will not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

Protests

This is an information-only advice letter submittal. Pursuant to General Order 96-B Section 6.2, PG&E is not seeking relief through this advice letter and is not subject to protest.

Effective Date

Pursuant to General Order (GO) 96-B, this advice letter is submitted with an informationonly designation (Tier 1). PG&E requests that this advice submittal become effective upon date of submittal, which is December 15, 2025.

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. 24-09-012. 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/ Sidney Bob Dietz II Director, Regulatory Relations **CPUC Communications**

Attachment:

Attachment A - Downrate Project Pipelines 0618-03 Mile Point (MP) 0-3.52, 0618-05 MP 0-1.41, 0618-10 MP 0-1.47, and District Regulation Route (DREG) 4093 MP 0-1.75.

Service List R.24-09-012 CC: Jean Spencer, Energy Division





California Public Utilities Commission

ADVICE LETTER



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|---|--|
| 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 | Contact Person: Kimberly Loo Phone #: (279)789-6209 E-mail: PGETariffs@pge.com E-mail Disposition Notice to: Kimberly.Loo@pge.com |
| EXPLANATION OF UTILITY TYPE ELC = Electric GAS = Gas WATER = Water PLC = Pipeline HEAT = Heat WATER = Water | (Date Submitted / Received Stamp by CPUC) |
| Advice Letter (AL) #: 5153-G | Tier Designation: Information-Only |
| Subject of AL: Notification of Planned Deration/Downrate of Gas Transmission Pipelines 0618-03 Mile Point (MP) 0-3.52, 0618-05 MP 0-1.41, 0618-10 MP 0-1.47, and District Regulation Route 4093 MP 0-1.75 | |
| 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.23-12-003 | |
| Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: $_{ m No}$ | |
| Summarize differences between the AL and the prior withdrawn or rejected AL: | |
| Confidential treatment requested? Yes Vo | |
| 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: 12/15/25 | No. of tariff sheets: $ m _{N/A}$ |
| Estimated system annual revenue effect (%): $_{ m N/A}$ | |
| 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 $^{\mbox{\tiny 1:}}$ $_{N/A}$ | |
| Pending advice letters that revise the same tariff sheets: $ m _{N/A}$ | |

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

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

Attachment A – Downrate Project Pipelines 0618-03 Mile Point (MP) 0-3.52, 0618-05 MP 0-1.41, 0618-10 MP 0-1.47, and District Regulation Route (DREG) 4093 MP 0-1.75.

A. <u>Information on transmission pipelines demonstrating that they are no longer needed at total nominal capacity</u>

This is a bundled project to downrate and reclassify several transmission pipelines. The project will downrate the following Distribution Feeder Mains (DFMs): 0618-03 MP 0-3.52, 0618-05 MP 0-1.41, 0618-10 MP 0-1.47, and District Regulation Route (DREG) 4093 MP 0-1.75. The pipelines are radial transmission lines serving multiple distribution regulator stations in Citrus Heights, Antelope, and Sacramento communities. These routes will be downrated from the current Maximum Allowable Operating Pressure (MAOP) of 500 psig to a new MAOP of 281 psig, which will provide adequate capacity to meet system demands.

B. Demonstrate that new distribution pipeline is needed to serve customers

PG&E's hydraulic analysis indicates that the downrated DFMs are necessary to continue providing reliable gas service to the existing customers, as they are the sole feed to more than 55,000 customers in Sacramento and the surrounding area.

C. Summary of anticipated costs and forecasted schedule

The estimated cost for PG&E's downrate project is approximately \$5.5M (\$5.0M capital and \$0.5M expense). PG&E will be implementing a temporary construction measure in 2025 to reduce pressure and reclassify the pipelines by December 22, 2025. A permanent construction solution for the downrate project will be implemented in 2026. PG&E anticipates work on the permanent construction solution will commence in the February to April 2026 timeframe.

The downrate projects include:

- S-1472: Installation of Temporary Regulation Equipment (2025)
- S-1408: Rebuild of Antelope Meter Station, Installation of Permanent Regulation Equipment (2026)
- Distribution station retrofits (2026)

The downrate will avoid the following planned work: 30-year Net Present Value Cost and Work Avoided (Capital): -\$1.1M

• 1 pipe replacement

30-year Net Present Value Cost and Work Avoided (Expense): -\$17.3M

- 2 recurring strength tests
- 1 recurring Non-Traditional In-Line Inspection

Transmission pipeline downrates enable PG&E to spend on risk reduction more efficiently by reallocating avoided costs to mitigate risk elsewhere on the gas system. They also provide qualitative greenhouse gas emissions benefits by reducing the magnitude and likelihood of pipeline leaks due to the reduced operating pressure.

Avoided work and respective avoided costs are typically identified upstream of detailed design and estimating and are therefore reported based on high-level assumptions. Because of identified pipeline integrity threats, the work avoided would likely be required if the downrate project was not implemented. While integrity threats can change as PG&E integrates new data and learnings, for these cost avoidance calculations PG&E assumes that existing threat mitigations would recur on a (seven) 7-year reassessment cycle. Cost estimates are based on program unit costs and subject matter expert input.

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

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

OnGrid Solar