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

Pacific Gas & Electric Company
GAS (Corp ID 39)
Status of Advice Letter 5201G
As of June 9, 2026

Subject: Compliance Report on the Adequacy of Backbone Transmission Capacity Holdings and Capacity Utilization

Division Assigned: Energy

Date Filed: 04-15-2026

Date to Calendar: 04-20-2026

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Authorizing Documents: D2207002

Disposition:	**Accepted**
Effective Date:	**05-15-2026**

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

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AL Certificate Contact Information:

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

To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

Advice Letter Number
Name of Filer
CPUC Corporate ID number of Filer
Subject of Filing
Date Filed
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Effective Date of Filing
Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

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Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

Pacific Gas and Electric Company

Sidney Bob Dietz II
Director
Regulatory Relations

Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, CA 94612

April 15, 2026

Advice 5201-G
(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: **Compliance Report on the Adequacy of Backbone Transmission Capacity Holdings and Capacity Utilization**

Pacific Gas and Electric Company ("PG&E") hereby submits for filing a compliance report on the adequacy of PG&E's backbone transmission capacity holdings and slack capacity consistent with PG&E's proposals in Phase II of the Gas Capacity Order Instituting Rulemaking ("OIR"), Decision ("D.") 06-09-039 and required updates from the OIR to Establish Policies, Processes, and Rules to Ensure Safe and Reliable Gas Systems in California and perform Long-Term Gas System Planning (Track 1A and 1B), D.22-07-002.

Purpose

The purpose of this advice letter and the attached report is to comply with Ordering Paragraph (OP) 3 in D.06-09-039 and to provide the California Public Utilities Commission ("Commission") with an update on PG&E's backbone transmission capacity utilization outlook and (OP) 5 in D.22-07-002 to update the reporting schedule of these advice letters on slack capacity biannually rather than biennially.

Background

In 2004, the Commission issued Rulemaking ("R.") 04-01-025 to investigate the adequacy of natural gas supplies and infrastructure to meet the long-term needs of the gas consumers in California. In D.06-09-039, the Commission determined that it was "comfortable with the total amount of firm backbone transmission capacity on both the PG&E and SoCal Gas systems."[1] To ensure that the utilities monitor the adequacy of their backbone capacity, the Commission required that the utility make biennial advice letter submittals, starting in 2008, to demonstrate that they have adequate backbone capacity consistent with the showings made in Rulemaking 04-01-025. The eighth biennial report was submitted on July 1, 2022.

On July 14, 2022, the Commission issued D.22-07-002 in R.20-01-007 which ordered SoCalGas and PG&E to file their advice letters on slack capacity biannually rather than biennially and include detailed information about their actual, rather than their nominal

[1] D.06-09-039, Finding of Fact 12.

backbone transmission capacity, and whether that capacity is sufficient to meet the average day in a 1-in-10 cold-and-dry hydroelectric year backbone capacity standard.[2]

Specifically, (OP) 5 states:

> *Pacific Gas and Electric Company and Southern California Gas Company shall report biannually (on April 15 and October 15) on any changes impacting their ability to meet the minimum design standard, specifying the actual operating capacities of the utilities' backbone transmission lines/zonal areas or paths not the nominal capacities as described in Appendix A, Attachment 1*

This Decision also directed that the Tier 2 advice letter should be served on the R.20-01-007 service list and must specify the actual—not the nominal— average Cycle 1 operating capacities of the utilities' backbone transmission pipelines by zonal area or path over the previous nine-month period in both million cubic feet per day (MMcfd) and dekatherms (Dth) according to the formulas described in Appendix A, Attachment 1.[3]

Summary of Report

Based on the information contained in the attached report, PG&E has adequate backbone transmission capacity to ensure that both current and forecast demand can be met based on the criteria adopted in D.06-09-039 through 2035. As such, the demand forecasts were based on the 2024 California Gas Report.

PG&E has added information on the average Cycle1 operating capacities of the utilities 'backbone transmission pipelines by zonal area or path over the previous nine-month period in both million cubic feet per day (MMcfd) and dekatherms (Dth) according to the formulas described in Appendix A, Attachment 1.

In conclusion, for the reporting period ending March 31, 2026, there were no significant changes impacting PG&E's ability to meet the minimum design standard, as shown in Section C, PG&E's actual average operating capacities of the backbone transmission lines/paths compared to the 1-in-10 cold and dry hydroelectric year backbone capacity standard. PG&E's combined total actual average operating capacities were sufficient to meet the average day in a 1-in-10 cold-and-dry hydroelectric year backbone capacity standard over the previous nine-month period.

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

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[2] D.22-07-002, Conclusion of Law 10
[3] D.22-07-002 p. 17, A-1

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than May 5, 2026, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to PG&E via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
E-mail: PGETariffs@pge.com

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

Effective Date

PG&E requests that this Tier 2 advice letter become effective on regular notice, May 15, 2026, which is 30 calendar days after the date of submittal.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list and the parties on the service list for R.04-01-025, R.20-01-007 and 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 1: Compliance Report on the Adequacy of Backbone Transmission Capacity Holdings and Capacity Utilization

cc: Service Lists
R.04-01-025
R.20-01-007
R.24-09-012

California Public Utilities Commission

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: 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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5201-G

Tier Designation: 2

Subject of AL: Compliance Report on the Adequacy of Backbone Transmission Capacity Holdings and Capacity Utilization

Keywords (choose from CPUC listing): Compliance

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☐ One-Time ☑ Other: Biannual

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.06-09-039, D.22-07-002

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? ☐ Yes ☑ No

If yes, specification of confidential information:
Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? ☐ Yes ☑ No

Requested effective date: 5/15/26

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[1]: N/A

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

[1]Discuss in AL if more space is needed.

Clear Form

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

Clear Form

Attachment 1

Compliance Report on the Adequacy of Backbone Transmission Capacity Holdings and Capacity Utilization

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 1

COMPLIANCE REPORT ON THE ADEQUACY OF BACKBONE TRANSMISSION CAPACITY HOLDINGS AND CAPACITY UTILIZATION

SUBMITTED APRIL 15, 2026

PACIFIC GAS AND ELECTRIC COMPANY
ATTACHMENT 1
COMPLIANCE REPORT ON THE ADEQUACY OF
BACKBONE TRANSMISSION CAPACITY HOLDINGS AND
CAPACITY UTILIZATION

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PACIFIC GAS AND ELECTRIC COMPANY
ATTACHMENT 1
COMPLIANCE REPORT ON THE ADEQUACY OF BACKBONE TRANSMISSION CAPACITY HOLDINGS AND CAPACITY UTILIZATION

A. Introduction

In Decision 06-09-039, the California Public Utilities Commission (Commission) adopted a natural gas transportation backbone capacity utilization guideline for Pacific Gas and Electric Company (PG&E) and Southern California Gas Company (SoCalGas). This guideline states that if annual utilization of intrastate backbone transmission capacity exceeds 80-90 percent on a forecast basis, an expansion of capacity may be needed. This guideline is set as a range to provide the utilities with flexibility to manage how and when to make new infrastructure investments.

D.06-09-039 required that:

> *The Pacific Gas and Electric Company and the Southern California Gas Company shall demonstrate in biennial advice letter filings to the Commission's Energy Division starting 2008 that they hold adequate backbone transmission capacity and have slack capacity consistent with their proposals presented herein.*[1]

In compliance with the Commission's direction, PG&E's July 1, 2022 filing (Advice 4625-G) updated the analysis PG&E performed in Phase II of Gas Capacity Order Instituting Rulemaking (OIR) (R.04-01-025) and in PG&E's previous compliance filings since 2008. This updated assessment addresses PG&E's holding of backbone and storage capacity to service core and bundled electric portfolios (Section B), adequacy of the backbone transmission system (Section E), and adequacy of the local transmission capacity (Section F).

The 2024 California Gas Report referenced in this filing was filed with the California Public Utilities Commission (CPUC) on July 1, 2024, and the 2024 California Gas Report workpapers filed on August 1, 2024.

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1 See D.06-09-039, Ordering Paragraph 3, at p. 184.

In July 2022, the Commission issued D.22-07-002 in R.20-01-007, which ordered SoCalGas and PG&E to file their advice letters on slack capacity bi-annually rather than biennially and include detailed information about their actual, rather than their nominal backbone transmission capacity, and whether that capacity is sufficient to meet the average day in a 1-in-10 cold-and-dry hydroelectric (hydro) year backbone capacity standard. Specifically, Ordering Paragraph (OP) 5, Pacific Gas and Electric Company and Southern California Gas Company shall report biannually (on April 15 and October 15) on any changes impacting their ability to meet the minimum design standard, specifying the actual operating capacities of the utilities' backbone transmission lines/zonal areas or paths not the nominal capacities as described in Appendix A, Attachment 1. The D.22-07-002 also directed that the advice letter should be served on the service list for R.20-01-007.

Although the reporting requirement schedule changed from biennially to biannually, the California Gas Report's reporting requirement remains at a biennial schedule. The "Previous Nine-Month Operating Backbone Capacity" in Section C details the actual average Cycle 1 operating capacities of PG&E's backbone transmission paths.

B. Adequacy of PG&E's Backbone Transmission Capacity Holdings

Since 1998, PG&E's intrastate backbone transmission capacity holdings to serve core customers have been determined through PG&E's Gas Transmission and Storage (GT&S)[2] and Cost Allocation Rate Design (CARD) Rate Case[3] Applications. This Application structure has provided core customers access to PG&E gas transmission and storage services, while also providing, among other things, the opportunity for all participating parties to evaluate PG&E's core backbone transmission and storage holdings. The Commission authorized acquisition of storage capacity from the Independent Storage Providers (ISP),

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2 See A.21-06-021

3 See A.21-09-018

firm intrastate and interstate pipeline capacity, and/or firm peaking supply arrangements to meet the core planning standard.[4]

PG&E believes that the combined General Rate Case (GRC) and CARD proceedings and the Bundled Procurement Plan are the appropriate forums in which to address the adequacy of PG&E's intrastate contractual holdings for the core and bundled electric portfolios, respectively.

C. Backbone Capacity Utilization

Additional pipeline capacity over and above average demand levels provides significant value to customers even in years without pipeline maintenance outages, supply disruptions, or increased demand. Additional pipeline capacity allows the market flexibility to move purchases between receipt points, which results in more gas-on-gas competition at the PG&E Citygate. Additional pipeline capacity, when combined with storage, also provides significant flexibility for customers to time their gas purchases throughout the year.

Figures 1, 2, and 3 below show backbone capacity utilization during the 24-month period ending March 31, 2026. The Redwood Path continued to be the preferred supply path as shippers used it to transport gas from the Rocky Mountains on the Ruby Pipeline and from Canada on Gas Transmission Northwest to PG&E's system. The Redwood Path had high utilization averaging 82 %, peaking at 97% in July 2024.

During the past 24 months, the Baja Path, which shippers used to transport gas from Texas and the U.S. Southwest on the El Paso Natural Gas and Transwestern pipelines, had an average utilization rate of 64%.

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[4] See D.06-07-010, Ordering Paragraph 1, at p. 36.

FIGURE 1
PERCENT BACKBONE CAPACITY UTILIZATION BY PATH
APR 2024 - MAR 2026

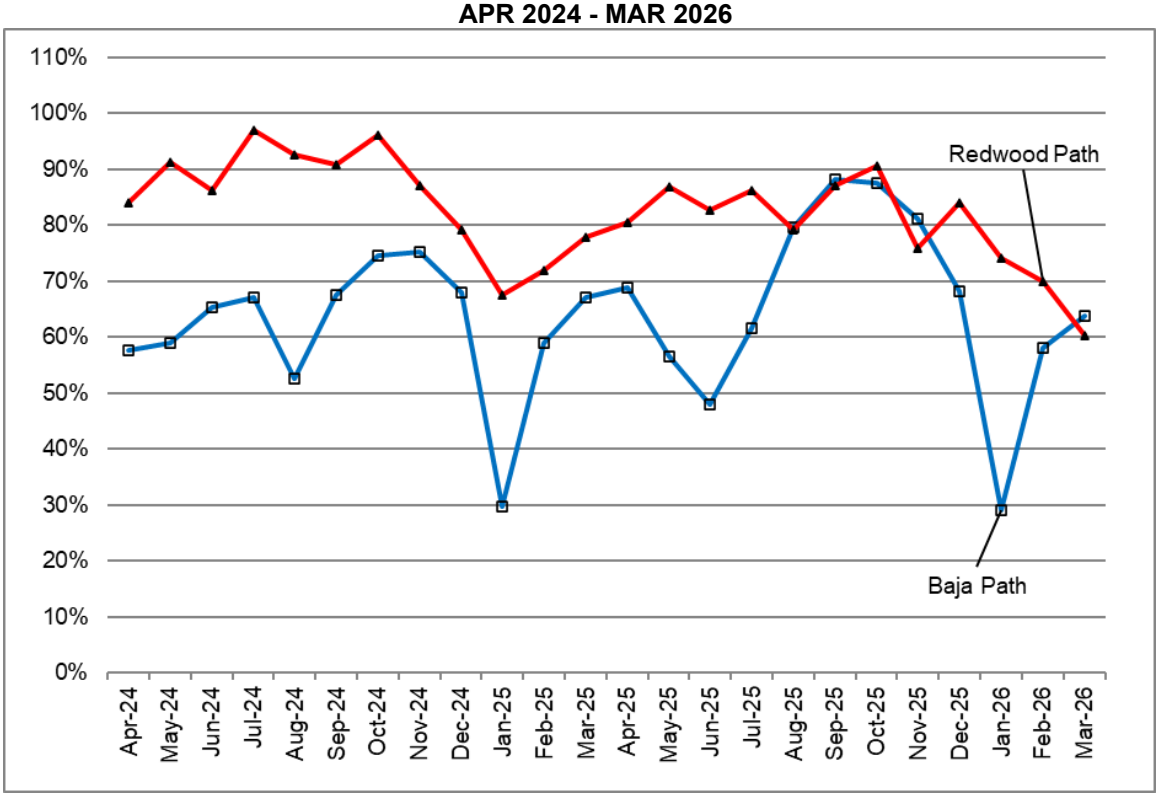


FIGURE 2
BACKBONE CAPACITY AND FLOW BY PATH (MMCF/D)
APR 2024 - MAR 2026

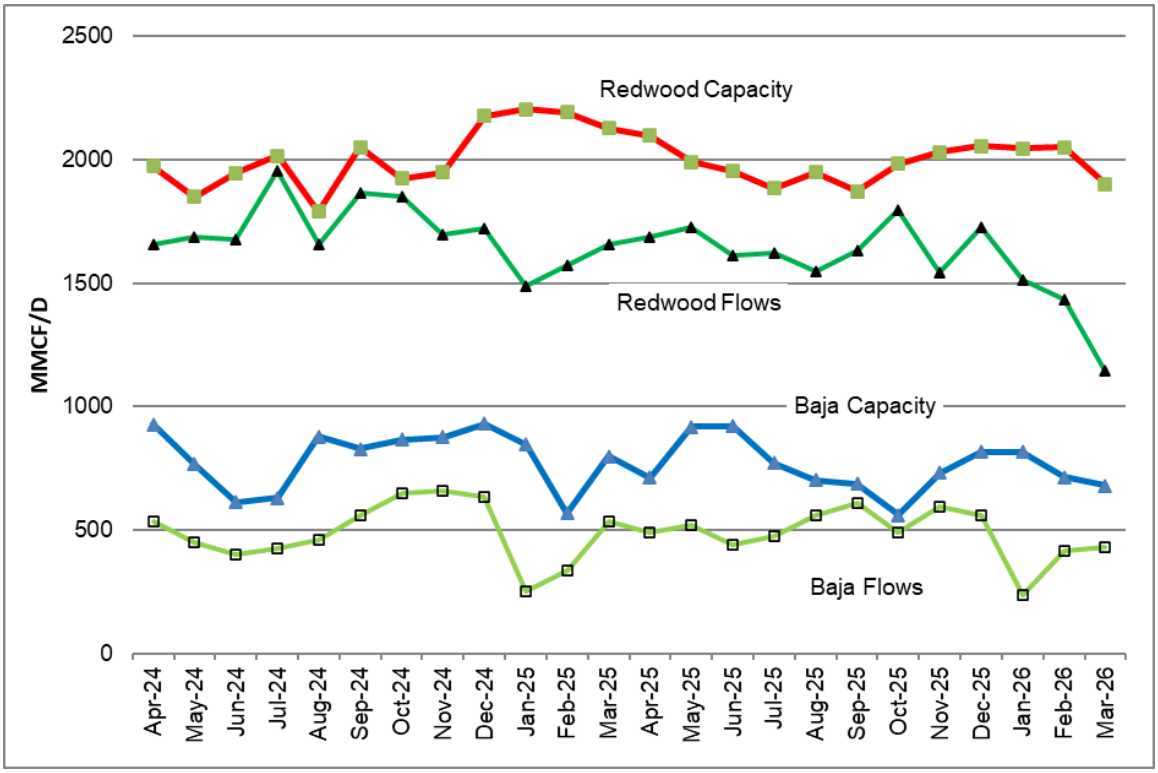
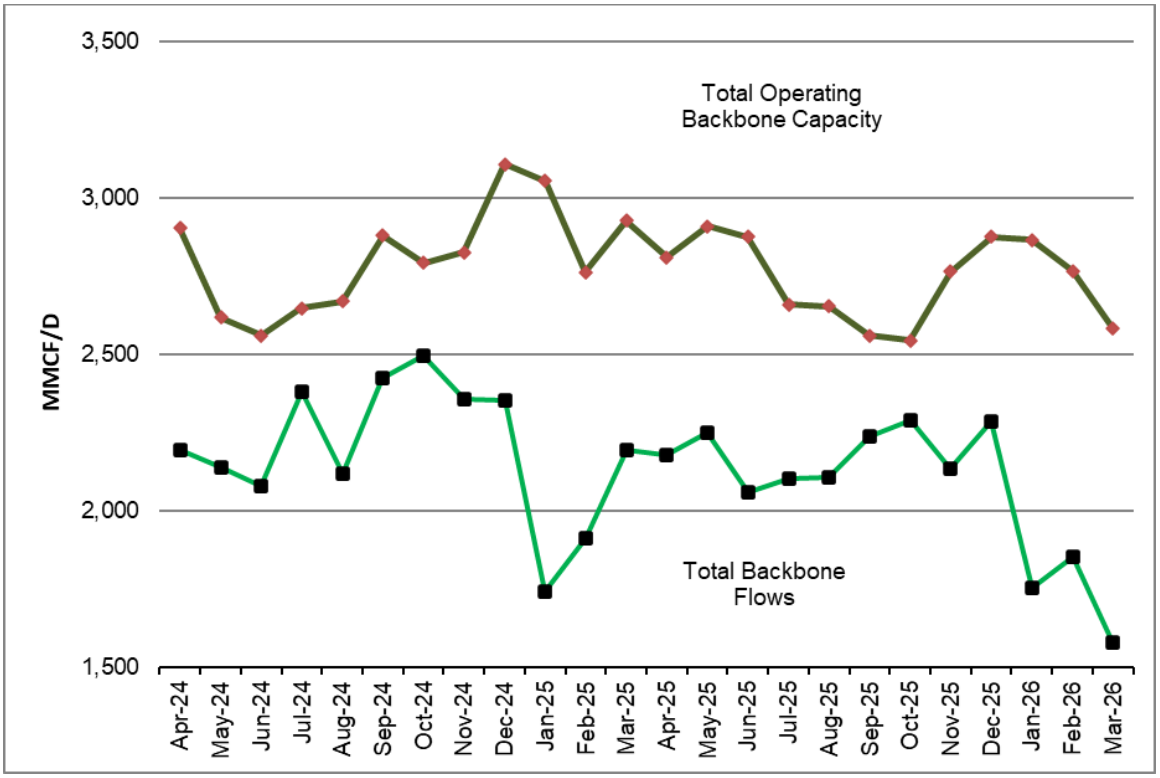


FIGURE 3
TOTAL BACKBONE CAPACITY AND FLOWS (MMCF/D)
APR 2024 - MAR 2026



A sufficient backbone capacity margin ensures that the marginal supply source at the California border is available to compete against any other supply source that might otherwise drive a higher price. A margin of capacity also facilitates the injection of gas into storage. This storage injection occurs in addition to end-use demand for gas on the backbone system, resulting in high pipeline utilization at certain times of the year.

The market takes advantage of the extra backbone capacity to time reliable injection and withdrawal of gas to and from the storage fields. Gas is typically bought for injection at times when its current price is lower than its anticipated future value, when it will be withdrawn. Without the extra backbone capacity on PG&E's system, customers would be significantly constrained in their ability to time the injection of gas into storage fields. The price of natural gas can vary substantially from month to month and the lowest prices are usually seen in the spring and fall months. It is important to maintain sufficient backbone capacity for the market to make large injections in months when natural gas prices are lower.

Previous Nine-Month Operating Backbone Capacity

Figures 4 and 5 below represent daily actual operating capacities for the Redwood and Baja-Topock paths, plus California production gas scheduled volumes in MMcf/day and Dth/day. For the 9-month period between July 1, 2025 and March 31, 2026, the calculation[5] for the Redwood Path averaged 1,973 MMcf/d or 2,075,926 Dth/d, the Baja Path averaged 878 MMcf /d or 893,853 Dth/d, and California Production averaged 19.8 MMcf /d or 19,774 Dth/d. Combined total available backbone capacity averaged 2,871 MMCF/d or 2,989,553 Dth/d and was above the required threshold to maintain adequate backbone capacity to meet the average day in a 1-in-10 cold-and-dry hydroelectric year backbone capacity standard established by D.06-09-039. The 2024 California Gas Report reflected a new daily threshold of 2,554 MMcf/d or 2,651,052 Dth/d (2,644 MMcfd * 1038 BTU Conversion (Dth/MMcf)) for 2025 and for 2026, the threshold updated to 2,493 MMcf/d or 2,602,692 Dth/d (2,493 MMcf/d*1044 BTU) Conversion (Dth/MMcf) which is represented in Figures 4 and 5.[6] The average combined total available backbone capacity for the 9-

[5] D.22-07-002, Appendix A, Attachment 1 Sample Calculations of Total Available

[6] 2024 California Gas Report, p. 99, Table 30 – ANNUAL GAS SUPPLY FORECAST 2024-2028, Line 25.

month period between January 1, 2025, and October 30, 2025 was above the 1-in-10 cold-and-dry hydroelectric year backbone capacity standard.

FIGURE 4
TOTAL AVAILABLE CAPACITY FOR REDWOOD, BAJA-TOPOCK AND CALIFORNIA PRODUCTION (MMCF/D)
JUL 2025 - MAR 2026

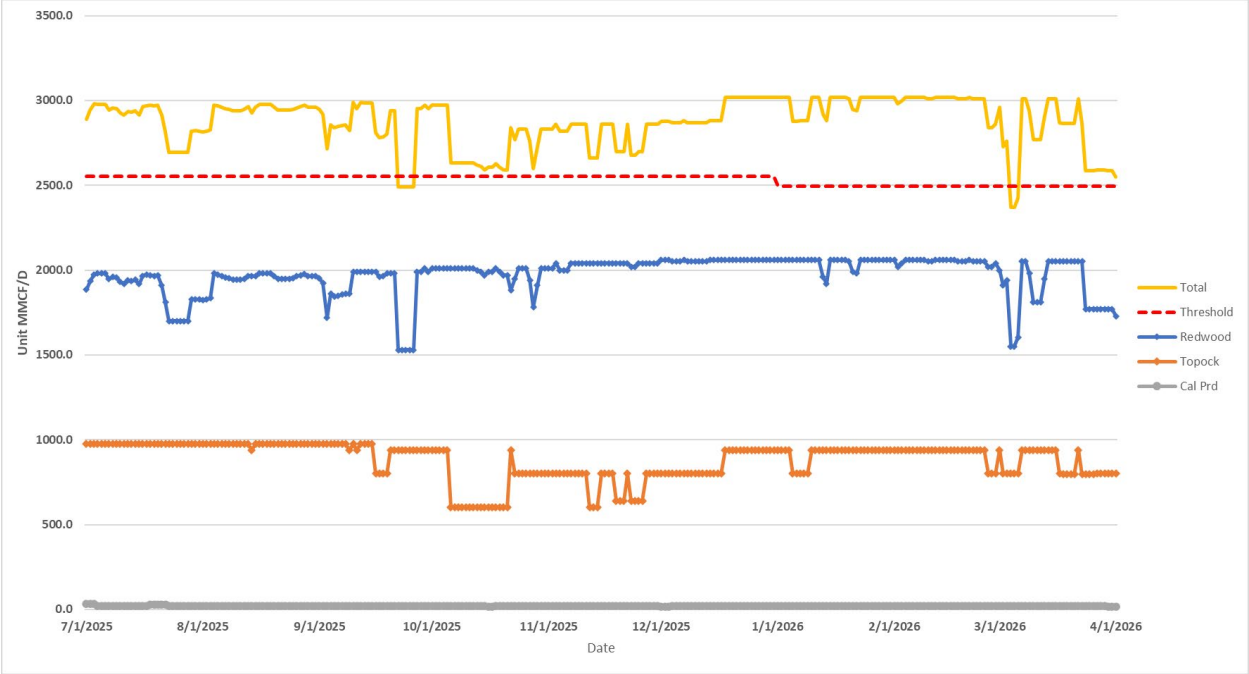
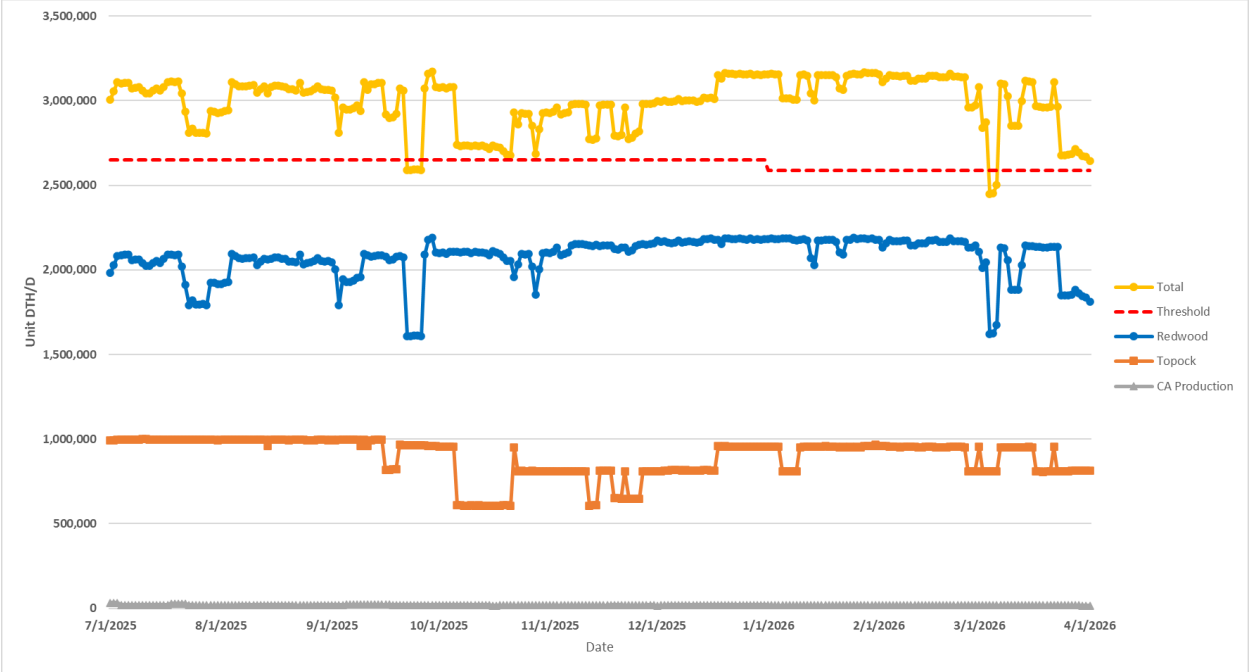


FIGURE 5
TOTAL AVAILABLE CAPACITY FOR REDWOOD, BAJA-TOPOCK AND CALIFORNIA PRODUCTION (DTH/D)
JUL 2025 - MAR 2026



Although the average combined total available backbone capacity for the 9-month period between July 1, 2025, and March 31, 2026, was above the capacity standard, it did fall below the standard on one occasion starting on March 4, 2026 due to maintenance as detailed in Table 1.[7]

TABLE 1

DAILY TOTAL AVAILABLE BACKBONE SLACK CAPACITY

First Gas Day Impacted	**(a)**	**(b)**	**(c)**	**(d)**	**(e)**	**(f=d-e)**
Gas Day, 03/04/2026	**Redwood Path**	**Baja - Topock**	**California Production**	**Total Available Capacity**	**1-in-10 Cold & Dry Year**	**Slack Capacity**
Available Receipt Point Capacity (MMcf/d)	1,530	940	20	2,490	2,554	(121)
Available Receipt Point Capacity (Dth/d)	1,607,383	962,665	20,138	2,590,186	2,651,052	(121,212)
Comments	Redwood Path: Delevan Station Maintenance (3/4/26-3/6/26) Baja Path: Topock Compressor Station Maintenance (3/4/26-3/6/26)					

[7] Advice 5186-G, Table 1

D. Demand Forecasts

To assess the adequacy of PG&E's infrastructure to meet current and future demand, PG&E used the demand forecasts in the 2024 California Gas Report. The California Gas Report provides a comprehensive, long-term outlook for natural gas requirements for both core and noncore demand sectors. Evaluating PG&E's infrastructure using the California Gas Report forecasts provides a valid assessment of the adequacy of PG&E's infrastructure to meet current and future demand through 2031.

The off-system demand forecast presented in this analysis is the same as that presented in the 2024 California Gas Report for the years 2025-2031 & 2035. PG&E off-system demand forecast averages 320 MMcf/d from 2025 through 2030. Afterwards, the off-system demand forecast is zero starting in 2031. This forecast reflects PG&E's actual currently booked off-system contracts for 2025-2030. PG&E anticipates its future off-system contracts will be short-term and/or discounted contracts, as is the current practice. PG&E would expand backbone capacity to serve the off-system market only if it had additional customers willing to pay full tariff rates under long-term contracts and recover additional revenue requirements to recover the expansion.

PG&E developed the 1-in-10 year Cold and Dry Forecast by relying on cold temperature conditions combined with dry hydroelectric conditions. This forecast assumes that cold winter temperatures and dry hydroelectric generation conditions over the time horizon will have a 1-in-10 likelihood of occurrence. The cold weather assumption increases gas and electric load for space heating needs as well as electric generation (EG) gas demand in the colder months The next gas demand forecast updates will be in the 2026 California Gas Report submitted during summer 2026.

E. Adequacy of PG&E's Backbone Transmission Capacity

Table 2 below shows the transmission capacity of the PG&E backbone system. Table 3 compares the amount of backbone capacity to forecasted demand on the PG&E system from 2026 to 2035. Based on this demand forecast, PG&E expects average annual backbone capacity utilization to be 87 percent or less from 2026 through 2027, and 81 percent or less from 2028 through 2031, indicating compliance with the 80-90 percent annual utilization

standard established in D.06-09-039. Note that the higher annual utilization rates in the early years of the forecast period stem from the currently booked contracts for off-system service discussed above. While there is uncertainty in this forecast, the window provides sufficient lead time for system enhancements to meet longer-term growth should the forecast of system use change over time. Other than the increase in demand arising from currently booked off-system contracts, PG&E estimates that utilization of its backbone system through 2035 will be gradually decreasing.

TABLE 2
PG&E BACKBONE TRANSMISSION CAPACITY
(MMcf/d)

Line No.	Transmission Path	Firm Receipt Capacity[a]
1	Silverado Path[b]	35
2	Baja Path	940
3	Redwood Path	1902
4	Total	2,877

(a) Firm receipt capacities are those currently approved for use within PG&E.

(b) California source gas based on 2024 California Gas Report Table 22, line 5 (see note 3 for details).

TABLE 3
PG&E BACKBONE CAPACITY UTILIZATION
(MMcf/d)

Line No.	Year	Average Demand[(a)]	1-in-10 Cold and Dry Year Demand[(a)]	Backbone Receipt Capacity[(b)]	Capacity Utilization Cold and Dry Year Demand
1	2026	2,305	2,493	2,877	87%
2	2027	2,240	2,411	2,877	84%
3	2028	2,182	2,335	2,877	81%
4	2029	2,112	2,247	2,877	78%
5	2030	2,135	2,307	2,877	80%
6	2031	1,801	1,998	2,877	69%
7	2035	1,464	1,650	2,877	57%

(a) Average Demands and 1-in-10 Cold and Dry Year Demands are based on the 2024 California Gas Report Tables 28-31. Off-system deliveries are not forecasted beyond 2030 (see line 23) and will be updated in the 2026 California Gas Report.

(b) Backbone receipt capacity for lines 1--7 is taken from Chapter 9 of 2027 GRC.

Table 4 shows the forecast of peak day demands and available capacities and is the same as the 2024 California Gas Report. The core demand is the forecast demand anticipated during a 1-in-10 year peak day event. The noncore non-EG demand is the average forecast daily demand modified to account for the historical relationship between noncore non-EG gas demand on a peak winter day and an average winter day. PG&E forecasts the peak day demand for electric generation in Table 4 by taking the 90th percentile of December-February daily demand under 1-in-10 cold-and-dry conditions from the 2024 California Gas Report. A 1-in-10 cold-and-dry condition represents the forecasted demands for a 1-in-10 cold temperature and dry-hydro year. For 2026, California reservoir levels are mostly at or above historical averages[8], which are indicative of at least average hydroelectric generation conditions. PG&E expects to have sufficient capacity to meet firm inventory management and core obligations under average hydroelectric generation conditions.

[8] California Department of Water Resources, as of April 7, 2025. https://cdec.water.ca.gov/resapp/RescondMain

Demand forecasts are driven by modeling assumptions. This is especially true for the electric generation gas demand forecast. Deviations between forecast assumptions and actual conditions may result in differences between the forecast and recorded gas demand. Daily electric generation demand in PG&E's service area is not only dependent on conditions in Northern California, but also Southern California, and throughout the Western Electricity Coordinating Council (WECC). Factors affecting uncertainty in electric generation forecasts include power plant outages and transmission line outages, hydroelectric generation conditions, renewable energy and battery storage resource additions (and delays), and natural gas prices. Taking the 90th percentile high demand day represents a reasonable balance between overplanning capacity, i.e., planning capacity based on the highest peak day demand, and not having adequate capacity to supply EG facilities that would be needed to ensure the reliability of the electric system.

TABLE 4
FORECAST OF DEMANDS FOR CAPACITY AND THE AVAILABLE CAPACITY
(MMcf/d)

Line No.	Forecast	2026-2027	2027-2028
1	Core Peak Day Demand[a]	2,488	2,487
2	Noncore NonEG Demand[b]	516	518
3	EG, Including SMUD[c]	915	974
4	Off System and Shrinkage[d]	123	123 [g]
5	Inventory Management[e]	300	300 [g]
6	Reserve Capacity[e]	250	250 [g]
7	**Total Demands**	**4,592**	**4,652**
8	Northern Supply Capacity[f]	2,800	2,800
9	Southern Supply Capacity[f]	980	980
10	PG&E McDonald Island, Los Medanos, and PG&E Gill Ranch Storage[e]	926	869 [g]
11	California Production[f]	35	35
12	**Total Supply**	**4,741**	**4,684**
13	Short Fall or surplus	149	32

(a) Core Demand calculated for 34.6 degrees Fahrenheit system composite temperature taken from the 2024 California Gas Report Workpapers. These demand numbers include the adjustment for building electrification & Climate Change Modifier added in the 2024 California Gas Report.

(b) Noncore Non-EG demand is the average daily winter (December) demand under 1-in-10 Cold and Dry conditions from the 2024 California Gas Report.

(c) EG, including SMUD represents the 90th percentile of Dec-Feb daily demand under 1-in-10 Cold and Dry conditions from the 2024 California Gas Report.

(d) Off system derived from the Peak Day Supply Standard A.24-07-020 Table 3.

(e) These components are derived from the Peak Day Supply Standard A.24-07-020 Table 3.

(f) These components are derived from the PG&E's 2027 General Rate Case Table 9-19.

(g) These components are derived from the PG&E's 2027 General Rate Case Table 9-18.

The APD core forecast is developed using the observed relationship between historical daily weather and core usage data. This relationship is then used to forecast the core load under APD conditions. A 1-year forecast of APD demands is shown in Table 5. This table demonstrates the adequacy of existing supplies to meet core APD demands.

TABLE 5
FORECAST OF CORE GAS DEMAND AND FIRM SUPPLY ON AN ABNORMAL PEAK DAY
(MMcf/d)

Line No.	Description	2026-2027
1	Unadjusted APD Core Demand[(a)]	3,048
2	Climate Change Modifier[(b)]	-7
3	APD Core Demand with Climate Change Modifier[(c)]	3,041
4	PG&E Firm Storage withdrawal[(d)]	411
5	Maximum Firm Flowing Supply[(e)]	2,885

(a) Includes PG&E's Core Gas Supply Department and other Core Aggregator's core customer demands. APD core demand forecast is calculated for 28.2 degrees Fahrenheit system composite temperature, corresponding to a 1-in-90 year cold temperature event. PG&E uses a system composite based on six weather sites. This is a backbone core APD forecast.

(b) Forecasted PG&E climate change modifier. 2024 PG&E California Gas Report p. 59.

(c) Summation of Line Item 1 and Line Item 2.

(d) PG&E Core Firm Storage withdrawal as per Advice Letter 4886-G.

(e) Backbone Receipt Capacity is taken from Table 2 above. The Maximum Firm Flowing Supply includes firm Redwood and Baja capacities, and nominal amounts of California Production. Additional pipeline capacity available for ISP flows is not included.

F. Adequacy of Local Transmission Capacity and Design Criteria

PG&E's local gas transmission systems are designed to ensure safe and reliable service to customers. There are two design days: Cold Winter Day (CWD) and Abnormal Peak Day (APD). The CWD design day ensures adequate capacity to meet all expected core and noncore demands during a CWD. The APD design day ensures adequate capacity to meet expected core customer demands during an APD, with noncore demand assumed fully curtailed. PG&E is not proposing any changes to these standards.

The CWD design day is based on a cold event that has a recurrence interval of once every two years, on average. When analyzing each local transmission system for adequate capacity on CWD, all core and noncore customers are assumed to be at their CWD load.

The APD design day is based on an extreme cold weather event having a recurrence interval of once every 90 years, on average.

PG&E would attempt to serve noncore demand during an APD, but only to the extent such service does not impact service to the core demand. If there is not enough capacity to serve all demand, noncore curtailments may be necessary.

All of PG&E's local transmission systems meet the conditions of APD and CWD design days. All local transmission systems are not anticipated to experience simultaneous concurrent cold-weather events, such as an APD or CWD.

G. Conclusion

In summary, for this reporting period ending on March 31, 2026, there were no significant changes impacting PG&E's ability to meet the minimum design standard. Beyond the filing in March 2026 (see Table 1) where the capacity fell below the capacity standard, PG&E's average actual operating capacities were sufficient to meet the average day in a 1-in-10 cold-and-dry hydroelectric year backbone capacity standard.

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

AT&T

Albion Power Company
Alta Power Group, LLC

Anderson & Poole
BART

Ava Community Energy

BART
Buchalter
Barkovich & Yap, Inc.
Biering & Brown LLP
Braun Blaising Smith Wynne, P.C.

California Community Choice Association
California Cotton Ginners & Growers Association
California Energy Commission
California Hub for Energy Efficiency
California Alternative Energy and Advanced Transportation Financing Authority
California Public Utilities Commission
Calpine
Cameron-Daniel, P.C.
Casner, Steve
Center for Biological Diversity
Chevron Pipeline and Power

Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC

Davis Wright Tremaine LLP
Day Carter Murphy
Dept of General Services
Diablo Canyon Independent Safety Committee
Douglass & Liddell
Downey Brand LLP

Ellison Schneider & Harris LLP

Electrical Power Systems, Inc. Fresno
Engie North America
Engineers and Scientists of California

GenOn Energy, Inc.
Green Power Institute

Hanna & Morton LLP

ICF consulting
iCommLaw
International Power Technology
Intertie
Intestate Gas Services, Inc.

Kaplan Kirsch LLP
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP

Leviton Manufacturing Co., Inc.
Los Angeles County Integrated Waste Management Task Force

MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McClintock IP
McKenzie & Associates
Modesto Irrigation District
NLine Energy Inc.
NOSSAMAN LLP
NRG Energy Inc.

Pacific Gas and Electric Company
Peninsula Clean Energy
Pioneer Community Energy

Public Advocates Office
Redwood Coast Energy Authority

Regulatory & Cogeneration Service, Inc.
Resource Innovations
Rockpoint Gas Storage

San Diego Gas & Electric Company
San Jose Clean Energy
SPURR
Sempra Utilities
Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company

Spark Energy

Sun Light & Power
Sunshine Design
Stoel Rives LLP

Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

Utility Cost Management

Water and Energy Consulting

Yep Energy